

March 7, 2006

Mr. John Zych
Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, Ontario
M4P 1E4

Dear Mr. Zych:

**Re: PROPOSED AMENDMENTS TO THE STANDARD SUPPLY SERVICE CODE
BOARD FILE: RP-2004-0205**

This letter is submitted in response to the Board's Notice of Proposal to Amend the Standard Supply Service Code, as a coordinated response on behalf of the following distributors:

- The Coalition of Large Distributors ("the CLD"), namely:
 - Enersource Hydro Mississauga Inc.;
 - Horizons Utilities Corporation;
 - Hydro Ottawa Limited;
 - PowerStream Inc.;
 - Toronto Hydro-Electric System Limited; and
 - Veridian Connections Inc.
- Hydro One Networks Inc.
- Hydro One Brampton Networks Inc.

The CLD, Hydro One Networks, and Hydro One Brampton welcome the opportunity to comment on the Board's Proposed Amendments and generally support the amendments proposed in its notice of February 17, 2006. In particular we submit the following comments:

1. Mandatory Date for Time-of-use Pricing – We welcome the Board's recognition that the establishment of interim smart billing systems or manual "work arounds" are not viable options under the current environment. We agree with the flexibility provided to distributors who wish to begin implementing Time of Use RPP prices.

We do submit, however, that the term “adequate advanced notice” may mean different timelines to different LDCs. We urge the Board (i) to consider six months to be adequate advance notice once all the systems have been established and tested between the MDM/R and distributors, and (ii) to ensure that clear and detailed requirements are available to LDCs at the time of notification. This would enable distributors to properly prepare billing systems, processes, staff and customers and to test their systems to avoid costly bill errors prior to final implementation. In particular, LDCs will need time to prepare their customers for the changes they'll see on their bills, so that customers can change their electricity use patterns to make the intended use of this pricing option.

2. Bill-Presentment – TOU Prices – We agree that consumers will likely better understand TOU prices if the terms “off-peak”, “mid-peak” and “on-peak” are shown in the bill beside the applicable price.

We request the Board’s clarification on the potential need for LDCs to incorporate super/critical peak pricing capability in their billing. If this is implemented, then adequate advance notice and direction will be required, including proper terminology for bill format.

The proposed amendments do not mention the Standard Bill Format glossary of terms, and we request confirmation that these terms will not be added to the glossary. Some distributors may not be in a position to expand their glossary without introducing more significant bill format changes and costs.

3. Revised Definition of “Eligible Time-of-Use Meter” - We agree with the amendment of the definition of “eligible time-of-use meter” to include interval meters.
4. Final RPP Variance Settlement: Broadening the Scope - We support the amendment to broaden the scope to include customers that cease to be eligible for the RPP if their annual consumption exceeds 250,000 kWh. We do request a period of 90 days to implement this change, so that LDCs can make the appropriate billing system and business process changes, train staff, and provide advance notice to customers who will see the RPP variance true-up amount on their bill.

Additional Comments

We note that implementing Time-of-Use pricing may require changes to other Regulatory Codes and Procedures. For example, there may be an impact on EBT Standards, given the change in data and pricing that is passed between a LDC and a Retailer. We respectfully submit that the Board should review all other Codes and identify impacts before any newly established date for mandatory TOU pricing.

Significant customer communications activities will be required to introduce TOU pricing, help customers understand the benefits, and encourage them to take action to manage and change their electricity use. Distributors will want to understand the extent to which the Board will be involved in this consumer education, and would appreciate direction on how LDCs can recover costs incurred in communicating the TOU changes to customers.

Yours truly,



Paula Conboy
Director, Regulatory & Government Affairs

Cc: Kathi Litt, Enersource Hydro Mississauga
Cameron McKenzie, Horizons Utilities
Lynne Anderson, Hydro Ottawa
Rick Zebrowski, Toronto Hydro
George Armstrong, Veridian Connections
Oded Hubert, Hydro One Networks
Scott Mahr, Hydro One Brampton