

June 1, 2005

Mr. John Zych  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 26<sup>th</sup> Floor  
2300 Yonge Street, Toronto  
Ontario, M4P 1E4

Dear Mr. Zych

**Re: Response to Board's Revised Proposal to Issue a New Standard Supply Service Code and Amendments to the Retail Settlement Code  
Board File No. RP-2004-0205**

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This letter is submitted in response to the Board's Notice of Proposal to Amend the Standard Supply Service Code. The following six distributors are coordinating their response in this process as the Coalition of Large Distributors ("the CLD"):

- Enersource Hydro Mississauga Inc.;
- Horizons Utilities Inc.;
- Hydro Ottawa Limited;
- PowerStream Inc.;
- Toronto Hydro-Electric System Limited; and
- Veridian Connections Inc.

The CLD welcomes the opportunity to comment on the Board's Proposed Amendments and submits the following comments for the Board's consideration.

- We would suggest that the final RPP variance settlement rate be provided in cents/kWh format to 3 decimal places for consistency with other rates.
- Section 3.7.1 of the Code contemplates three situations where consumers are to receive the Final RPP variance settlement. The three situations specified are enrolment with a retailer; canceling account and moving out of province, and consumer electing spot in writing in respect of an interval metered service. We would submit that there is a fourth situation that is not explicitly specified in the Code whereby an RPP consumer no longer meets the low volume or designated consumer eligibility criteria. This would be particularly in cases where annual monitoring indicates kWh usage above 250,000 and/or 50 kW average monthly demand. In some cases, this may present the

majority of the movement out of price protection/RPP. We would propose that Section 3.7.1 reflect this fourth situation.

- While we would be able to accommodate the wording 'Final RPP Variance Settlement' on customers bills, it would entail a bill redesign and related expense. This expense is greater for those distribution companies that need to include French translation. These expenses are upwards of \$20,000. The benefit of the full description in our view does not outweigh the cost particularly since the 'RPP Variance Settlement' will only show up on bills when triggered; which we would submit will not be often. As such, we would propose that the Board adopt a truncated description of 'RPP Variance Settlement' such as:

Final RPP Variance       (18 characters)  
or  
Final RPP Settlement     (20 characters)

With respect to the French translation, we would propose the following:

Final RPP variance = Écart final de la GTR

Should the Board require further information and/or clarification to the comments provided in this letter, please do not hesitate to contact the undersigned. The CLD would be pleased to meet with the Board to discuss any aspect of our comments.

Yours truly,

Paula Conboy  
Director of Regulatory and Government Affairs, PowerStream Inc.