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July 21, 2006

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

*via email to [Boardsec@oeb.gov.on.ca](mailto:Boardsec@oeb.gov.on.ca) and by courier*

Dear Ms. Walli:

**Re: Proposed Amendments to the Standard Supply Service Code  
RP-2004-0205**

I write on behalf of Toronto Hydro-Electric System Limited ("THESL") and in response to the Board's July 12, 2006 Notice of Proposal to Amend the Standard supply Service Code ("SSS Code").

THESL supports the Board's proposal to amend the SSS Code to allow electricity distributors to implement new pilot projects relating to eligible TOU meters. THESL also supports the Board's assertion that several benefits derive from the implementation of TOU pricing by LDCs for TOU-eligible meter pilot projects.

Notwithstanding, THESL has reservations concerning the Board's proposal that these new pilot projects be subjected to Board approval before they can be implemented.

THESL acknowledges and understands the Board's perceived need to pre-approve new TOU pilot projects. However, considering the requirement in the licence of every LDC to comply with the Codes, THESL suggests that prior approval is unwarranted and redundant. THESL believes that the SSS Code, as amended, will provide sufficient authority and certainty for LDCs to implement new TOU projects. Additionally, THESL believes that the requirement to seek prior approval will unnecessarily increase regulatory burden and can introduce implementation delays into the process.

THESL urges the Board to permit LDCs to rely on the sufficiency of the SSS Code, as amended, for the implementation of new pilot programs, rather than require LDCs to seek approval prior to their implementation.

The requisite eight (8) paper copies of this submission are enclosed and electronic copies in both searchable Adobe Acrobat and Word have been sent by email to your office.

Yours truly,

Colleen Richmond for  
R. Zebrowski, Vice-President  
Regulatory Services

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