

June 6, 2006

Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto ON  
M4P 1E4  
Att'n: Board Secretary

Dear Mr. Zych:

**RE: COST ALLOCATION REVIEW. STAFF PROPOSAL REGARDING RATE CLASSIFICATIONS AND ASSOCIATED LOAD DATA REQUIREMENTS  
FILE NUMBER: EB-2005-0317**

With respect to the Staff Proposal regarding Rate Classifications and Associated Load Data Requirements [EB-2005-0317], Brantford Power wishes to submit the following comment pertaining to load Profile for Separate Unmetered Scattered Load Class [pages 6 and 7]. Given the variability in load shapes, between non-photo and photo sensitive unmetered scattered load, Brantford Power suggests that separate USL load profiles be utilized for cost allocation purposes.

As well, Brantford Power wishes to advise that it supports the Board staff recommendation to use Alternative 2a to model standby rates as a separate rate class where the distributor has relevant actual data or can reasonably estimate the same [pages 8 and 9].

Brantford Power's contact information is:

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Brantford Power thanks the Board and staff for the opportunity to provide comments on this matter.

Yours truly

*Original signed by*

Heather Wyatt  
Manager of Regulatory Compliance and Governance,  
Board Secretary

cc. Mr. George Mychailenko, CEO