



Niagara-on-the-Lake Hydro Inc.

January 24, 2006

Mr. John Vrantsidis
Ontario Energy Board

By e-mail

Re: EB-2005-0317 Cost Allocation Review – Scattered and Unmetered Loads

Dear Sir,

Niagara-on-the-Lake Hydro Inc. has but one comment as a follow-up to the CAR Phase 2 proceedings.

During the review of 'Unmetered and Scattered Loads', there was discussion of the Ontario Energy Board possibly issuing regulations as to the application of unmetered loads. An unmetered load is an arrangement that would normally provide a cost benefit to both the LDC (no meter, no meter reading required) and to the customer (lower initial installation cost). If both parties are mutually satisfied with this arrangement as providing an accurate means of billing, O.E.B regulation could only result in increased cost.

Niagara-on-the-Lake Hydro Inc. suggest that instead of issued regulations, LDC's may outline their policy for connecting unmetered loads in their Conditions of Service recognizing that irregular or extremely large loads would need to be metered. We believe this arrangement would allow for the continuance of mutually beneficial unmetered loads under circumstances that would ensure safe and accurate billing.

Sincerely,

Jim Huntingdon
President