



March 13, 2006

Mr. John Zych, Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St, Suite 2700
Toronto, Ontario, M4P 1E4

Re: Distribution System Code Amendments – Condominium Corporation Deposits (EB-2006-0030)

In regard to the proposed amendments to the Distribution System Code dated February 20, 2006 with respect to “Bulk-Metered Residential Condominiums” and the deposit calculation associated for the Condominium Corporation, London Hydro has the following comments with respect implementation of these changes, for your consideration.

Our customer billing system and the majority of rules that govern billing parameters, security deposit calculations and automated review of security deposit requirements is structured around the customer rate class identifiers. The deposit policy changes being proposed by the Board will result in the bulk metered Condominium Corporations being identified as General Service for billing purposes, General Service for calculation of the deposit amount and Residential for automated annual review of security deposit balance requirements. Additionally, our billing system currently does not contain information that would distinguish between a bulk metered Condominium Corporation and a bulk metered residential apartment, as they are both in the same rate class and to-date, there has been no reason to collect this information from the customer.

The process of identifying which customers are bulk metered Condominium Corporations versus bulk metered residential apartment buildings could be determined by a request of this information from each bulk metered customer account, or the onus could be placed upon the customer to make a self declaration similar to the process used for RPP implementation.

Our recommendation would be that the customer should declare their status as a Condominium Corporation, and provide sufficient evidence to support that declaration, such as a copy of their Articles of Incorporation.

It is our assumption that the calculation of the security deposit amount will be determined using the General Service rates that the Condominium Corporation is billed under, since the purpose of the deposit is to provide protection against the actual amounts invoiced to the customer. If this assumption is not correct, then further refinements to the billing systems would be necessary.

We are bringing these issues to your attention, as we believe they may be common to many other utilities and as a result, the proposed 30 day time frame to implement the security deposit revisions may not be sufficient time to make the required changes, if billing system modifications are required.

Depending upon the actual number of bulk metered Condominium Corporations at each utility, and assuming the customer is required to self declare, the issues mentioned above may be handled through manual processes outside of the billing systems, in which case the 30 time frame would be sufficient time to implement.

If you require any further information, please contact me directly.

Sincerely,

Ian McKenzie
Regulatory Analyst
Bus. (519) 661-5800 ext. 5579
Fax (519) 661-2596
mckenzi@londonhydro.com