

November 26, 2003

Paul Pudge, Assistant Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St., 26<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

Dear Mr. Pudge:

Re: RP-2002-0146

Please find below Thunder Bay Hydro Electricity Distribution Inc.'s comments on the proposed amendments to the Distribution System Code and the Retail Settlement Code.

#### Section 1.2

We are requesting that "disconnect/collect trips" be redefined to include phone calls from the LDC. These calls from the LDC demand payment and they clearly point out the possibility of load limiters and disconnection failing payment on the part of the customer.

#### Section 2.4.9

Increasing the timeline for residential deposit retention from one year to two years would better cover this type of customer's credit risk due to moves.

#### Section 2.4.10

Since late payments are a good indicator of future payment defaults, we believe that good payment history should include the criteria of late payments.

#### Section 2.4.25

We would like the threshold of a non-residential with a > 5000KW at a minimum be reworded to include any non-residential limited liability account where personal guarantees do not exist. It is these types of general service accounts that present the greatest number of credit risks to LDCs. Having these customers included in the 50% deposit refund category would significantly mitigate collection risk.

Thank you for the opportunity of commenting on these issues.

Sincerely,

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