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***Report on Stakeholder Submissions: Efficiencies in the
Electricity Distribution Sector***

March 15, 2004

1. The Consultation Process

Introduction

The Board's February 17-19, 2004 consultation was an effort on the part of the OEB to gain an understanding of stakeholders' perspectives on methods for furthering efficiencies in the electricity distribution sector. The consultation was not a formal Board proceeding leading to a Board decision.

As it looks towards the future, the Board is pursuing a more comprehensive, forward-looking view in its regulation and must be well informed on the broad impact of its regulatory requirements and related issues in order to provide greater regulatory policy certainty in Ontario's energy sector. This review is an example of the Board's new approach. The Board's consultation is intended as a first step in identifying potential efficiencies in the sector and will provide a framework for further discussion with industry.

Background

On January 21, 2004 the Ontario Energy Board invited stakeholders to participate in a consultation to review alternative ways of driving further efficiencies in the delivery of electricity services and to understand better the impact of implementing these alternatives on distributors and the broader electricity industry.

On February 10, the Board issued a discussion paper and invited interested stakeholders to submit oral presentations and written submissions for a consultation session that was scheduled for February 17, 18 and 19 in Toronto. Stakeholders were encouraged to not only comment on issues raised in the paper but also to raise other related issues that may result in further enhancing the efficiency and performance of the electricity distribution sector.

This report reflects the views expressed by stakeholders through oral presentations and written submissions. The Board received nearly 60 written submissions from stakeholders. Several of these were joint submissions that represented more than one entity. For example, submissions represented sixty-six local distribution companies (LDCs), nine energy marketers, and five consumer groups. Submissions were also made by various energy industry associations, financiers, rating agencies, labour groups, and others. During the 3-day consultation session, 33 of these submissions were supported by oral presentations. (All of the individual submissions have been posted on the OEB website: www.oeb.gov.on.ca.)

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Purpose of Document

This document seeks to summarize, at a high level, the oral presentations and written submissions provided by stakeholders. Points raised by stakeholder submissions are summarized under five headings:

- Current LDC efforts to pursue efficiencies, including points raised about sharing and contracting out services
- Views on consolidation, both positive and negative experiences
- Regulatory issues and PBR, including recommendations for second-generation PBR
- Load serving entities and the role of LDCs
- Conservation, distributed generation and demand side management.

2. Current LDC efforts to pursue efficiencies

Continuous Improvement

Representatives from many LDCs indicated that continuous improvements in the distribution business and the implementation of efficiency measures are key objectives of management. Examples of areas where LDCs indicated that efficiencies have been achieved, without any effect on the quality of customer service, included:

- Sharing of services or equipment with other distributors or with the municipal owners (e.g. meter reading, billing, asset management and asset services)
- Integrated load forecasting and planning for system expansion
- Contracting out of services, such as billing, meter reading, IT processing and tree trimming. The degree of work contracted out has been dependent in some instances on employment issues. While some LDCs negotiate the use of contractors with their unions, others have encountered more resistance
- The formation of alliances, informal cooperatives and partnerships with other distributors or industry players for achieving economies of scale for procuring services, training, or sharing of ideas
- Amalgamation or creation of joint ventures that benefit from economies of scale.

Many medium and small distributors indicated that their shareholders (municipal governments in most cases), have a vested interest in maintaining low rates; therefore they ensure that efficiency remains a priority for the LDC management.

Knowledge Sharing

A number of LDCs also indicated that it is common to share ideas and processes on how to increase their overall performance and generate efficiencies. This has allowed for best practices to disseminate among industry participants.

Other forums for sharing knowledge are the different groups and alliances that include several distributors and other industry participants. These organizations (e.g. the DEEP group, CHEC, NEPPA) expressed a common belief about the importance of ensuring that experiences are shared, whether through a formal relationship or more informal channels.

Issues

While LDCs discussed and showed the benefits from outsourcing, contracting out and sharing of service, a number of concerns were raised regarding the impact on the LDC businesses from these methods of generating efficiencies. Emerging workforce issues (e.g. safety due to cost reductions, loss of interdepartmental communication with contracting out, staff dislocation which can disrupt work and impact

morale) were raised. The short-term nature of efficiency gains from shared services and cooperative models was also argued.

There was agreement among many participants that there was currently no formal measurement of the efficiency gains in the sector. It was suggested that before any decisions are made regarding the future of the sector, the OEB should increase its efforts to evaluate and understand the sector, determine areas where efficiencies and inefficiencies exist, develop benchmarks (e.g. reliability, service quality, customer satisfaction), efficiency targets, and performance measures. Furthermore, it must clearly establish how it intends to measure efficiency in distribution performance.

The advancing age of Ontario's electricity industry workforce was raised as an issue that could affect the LDCs' ability to operate effectively and efficiently. An expected high turnover of employees through retirement, combined with the amount of time it takes to train most new employees (e.g. 5-7 years of apprenticeship training) were highlighted as issues that would contribute to a shortage of skilled workers in the sector.

Finally, participants expressed concern that the drive solely for economic efficiencies could impact the quality dimension including employee safety, reliability, community responsiveness, customer service, grid stability and employee safety.

3. Views on Consolidation

Differing views regarding consolidation were presented. Most smaller LDCs defended their ability to be efficient operators in the distribution sector and were of the viewpoint that bigger was not necessarily better. Some larger distributors and private sector participants, on the other hand, were advocates of consolidation (voluntary consolidation in most cases with a few strong views supporting mandatory consolidation) and incentives to encourage the efficient operation of the distribution system.

Benefits from Consolidation Experiences

A number of distributors have had direct experience with amalgamations and provided results from these amalgamations. These distributors indicated that significant economies of scale were achieved. The benefits cited from amalgamation included:

- System integration (e.g. administrative systems, billing systems, call centres)
- Savings through elimination of redundancies and overlaps (in roles as well as facilities)
- Reduced total labour cost
- Improved distribution system planning (e.g. improved efficiency such as voltage conversion or system optimization)
- Increased investment in capital-intensive technology (e.g. GIS, SCADA)
- Improved access to capital
- More efficient asset management
- Common engineering and record systems
- More effective regional planning (e.g. regionally unified operations can facilitate improved system planning and require fewer wholesale meters, sub-stations, etc.)
- Greater administrative efficiencies
- Better call centre support
- Reduced regulatory burden
- 24-hour by 7 days-a-week control centre

Amalgamated LDCs indicated that the consolidations were accomplished through different models, including but not limited to buyouts (Hydro One acquisitions), joint ownership (e.g. Markham and Vaughan with Richmond Hill), public/private partnerships (e.g. CNP and Westario) and

municipal amalgamations (e.g. Chatham-Kent and Greater Sudbury Hydro).

*Drawbacks
Associated with
Consolidation*

While there were benefits to consolidation, a number of issues and concerns were also raised. For example, it was indicated that amalgamations resulted in new costs such as wholesale meter upgrades, meter service provider fees, regulatory compliance costs, and new technology.

Many questions were raised regarding the need for amalgamations to achieve efficiencies. Some believed that benefits that could be achieved through amalgamation were also available to coalitions, cooperatives, associations and other groups of distributors where ownership changes were not necessary and distributors and their municipal owners retained a degree of independence and autonomy.

Participants also questioned the actual level of operational integration achieved in some of the mergers, particularly when considering the differences in standards and practices of the legacy LDCs and the time it actually takes to integrate the operations. Some expressed the view that in remote areas (with widely dispersed centres of population) it was more difficult to obtain benefits from consolidation, as the distance between LDCs will limit potential operational economies.

Some participants also indicated that from a cost perspective, consolidation can be counter-productive, for example where employee wages migrate to the highest level.

From a rates point of view, concern was expressed regarding the consolidation and rate harmonization which could result in some customers paying more for the same level of service (albeit there are questions on whether this is only a short term effect while the scale efficiencies are achieved).

Participating consumer groups emphasized that electricity is an essential service and that economic efficiency is of little interest unless it maintains or enhances reliability, customer service and rate reduction/stability. They questioned whether consolidation would improve these factors. Larger consumers expressed concern about inconsistencies across LDCs in rates, conditions of service, access to interval meters, retailer-consolidated billing support and access to billing data (such as net system load shape).

Several participants indicated that detailed studies of efficiencies gained from previous consolidation need to be made before further consolidation should proceed.

*Efficient Size
and Number of
Distributors*

Issues were also raised regarding the optimal size of distributors, as some presenters indicated that larger LDCs in the province had higher costs per customer than many of the smaller LDCs. In fact, various smaller LDCs presented success stories of pursuing efficiencies either by themselves or as part of larger groups. In addition, smaller distributors indicated that large companies were difficult to control and tend to be less responsive to customers.

Points presented that indicated the benefits of small distributors included:

- Small LDCs can achieve the same scale benefits as amalgamated entities through associations, partnerships and industry groups and avoid amalgamation costs.
- Small LDCs can implement change easier whereas larger organizations have inertia to change.
- A large base of distributors will further innovation as more companies will seek new ways to unlock efficiencies.
- Small LDCs are closer to the customers and are therefore best able to provide more personalized service.
- New technologies and communication systems can allow smaller LDCs to be technologically advanced.

While many have experiences with and viewpoints regarding the efficient size of a distributor and number of distributors, it was pointed out that no empirical evidence exists regarding the efficiencies gained from consolidation in the Ontario sector. Some participants expressed concern that decisions and approvals may be made without determining whether amalgamations makes economic sense and that hasty decisions should not be made since amalgamations are irreversible.

In terms of examining Ontario in relation to other jurisdictions, some participants expressed the view that the examples in other jurisdictions presented in the discussion paper were not representative of the Ontario situation.

Factors presented that should be considered when determining the optimal size and the composition of any proposed consolidation included:

- Proximity to load and other population concentrations
- Current practices that may or may not be compatible
- Goals of owners may or may not be compatible
- Boundary conditions (load transfers versus boundary changes)

*Municipal
Ownership
Considerations*

Participants also addressed the topic of municipal ownership.

A number of smaller distributors presented the argument that a local LDC can be a catalyst for local development, and as such, municipal owners often have the desire to retain an independent LDC. Local control was viewed as a non-economic objective that should not be ignored or discounted. Examples of key reasons offered by participants regarding why municipal ownership is critical include:

- Municipal owners use payments received from LDCs for economic development initiatives. Given the importance of LDCs to their municipal owner in terms of ensuring funds for economic development initiatives, it was argued that future changes to LDCs must be carefully considered because of potential negative impact on economic development and tax payers.
- Municipal ownership provides discipline; hence Provincial regulation can be more “light-handed”.
- Municipal ownership with a business-oriented Board of Directors and effective governance can be more effective than a central regulator when it comes to ensuring a high level of service at low cost.
- An independent LDC with municipal ownership can ensure community responsiveness and hence community competitiveness.

Concerns were expressed regarding municipal owners and in particular, it was argued that economics (e.g. a sound business case) is not necessarily the key driver in municipal decisions about amalgamations. One LDC indicated that while a study indicated that substantial savings could be generated amalgamating three LDCs, the municipal shareholders (unlike a private sector investor) were not motivated to proceed with amalgamation.

*Policy Stability
Considerations*

It was generally accepted that the lack of recent consolidations reflects a lack of opportunity and interest. A large majority of participants agreed that the unstable political and regulatory environment was a key reason for the lack of interest and that a stable environment is a prerequisite to any future consolidation activity in the province. A number of participants highlighted the instability created by past and recent legislative and policy changes (e.g. pending legislation, pending decisions about the future role of LDCs, Bill 210, Bill 100, transfer tax exemption changes) as the main causes for the lack of investor (including municipal investor) interest in distribution assets and caution regarding consolidation.

*Conditions for
Further
Consolidation*

Different participants highlighted a number of conditions required for successful consolidation efforts in the province. Conditions mentioned included:

- **Good business case:** Amalgamation should be voluntary and based on a sound business case for both parties. It was expected distributors will recognize efficiencies and decide on amalgamations if they make good business sense. This approach also recognizes the right of municipalities to determine the role of the LDC within its community.
- **Parties recognize the benefits:** There should be a willing buyer and seller, and both parties should recognize that there are clear benefits from the amalgamation.
- **Cost savings and/or improved service and rate reductions:** A proposed amalgamation should either increase or maintain the level of service and reliability
- **A plan is in place for informing/educating customers:** There should be a consumer education plan in place for any proposed amalgamation.
- **Need for a stable policy environment:** Clear rules are needed to encourage private investment as uncertainty creates reluctance to invest, resulting in a lack of capital needed for consolidation through acquisition. An appropriate PBR framework must be put in place.
- **Opportunity for a rate of return:** In many cases, current returns are low, resulting in depressed LDC values and reluctance to sell or attract investors. LDCs should be able to receive the maximum rate of return and should be in a position to raise the necessary capital to invest in the distribution system.
- **Revised Mergers Amalgamations Acquisitions and Divestitures (MAADs) Process:** The MAADs process should include some mechanism for measuring customer satisfaction pre and post amalgamation. MAADs should prescribe what best practices should be achieved and the MAADs process should ensure that proposed consolidations proceed only when there is a good business case and plans in place to achieve potential benefits.
- **Transfer Tax Exemption for the Private Sector:** Some have expressed concern regarding the inequity of the transfer tax with respect to private investors. It was proposed that to encourage private sector investment to drive further amalgamation, and to create a level playing field for private capital, the 10% private ownership limitation for the transfer tax exemption be eliminated.

- **Access to Hydro One assets:** There is a strong position that for some amalgamation to make sense, the LDCs should have the option of acquiring Hydro One distribution assets in areas contiguous to existing LDCs. Many believe that this will enhance customer value. Some participants also presented the view that consolidation should proceed to ensure that a single LDC becomes the provider within a single municipality (or a group of municipalities), and that LDC borders should coincide with municipal boundaries.

While the conditions described above were the views of a number of participants, there were also other viewpoints including a belief by some that the OEB should take a more active role in encouraging amalgamation.

Other participants pointed out that the current MAAD process is onerous enough and that any new requirements should not add undue costs to the amalgamation.

There is a view that there is a need for increased accountability at the LDC level. Some participants believe that without a regulatory mechanism for penalizing inefficient LDCs, these LDCs would have no incentive to operate efficiently and their municipal owner would not be motivated to examine alternatives for delivering better service to the local community.

4. Regulatory Issues and Performance Based Regulation (PBR)

<i>Regulatory Stability</i>	As discussed previously, most participants expressed concern regarding the instability of the regulatory environment. Participants indicated that without a stable framework, the overall performance of the LDCs will continue to be negatively affected.
<i>Performance Based Regulation</i>	Some participants expressed the view that first-generation PBR was not as successful as it could have been and they attributed this to political interferences (e.g. Bill 210) which have impacted return on equity and resulted in shareholders having very little appetite for future investment at this time. Some commented that first-generation PBR did not reward LDCs for being efficient and initial rates do not reflect actual costs.
<i>Second-generation PBR</i>	<p>Most participants agreed that PBR is necessary in order to encourage efficiencies and that the OEB should proceed with the PBR approach; however, stakeholders raised a number of issues in the following areas:</p> <ul style="list-style-type: none">• Appropriate selection of Service Quality Indicators (SQI): There was concern about the appropriateness and the number of SQI selected by the OEB. Some presenters indicated that future PBR efforts should include a revision of the SQIs given the importance of service quality to customer value.• Rebasing: A number of participants suggested that the rates set in the first-generation PBR are not reflective of the true cost for the distributor, and the OEB should conduct a rebasing exercise that considers, among other things, special circumstances of distributors (such as very low density, geographical considerations, etc) that may increase costs and perform cost of service studies.• Yardstick Considerations: Some participants also indicated that for PBR and general benchmarking purposes, the OEB should consider comparing LDCs that have similar conditions, instead of comparing all the LDCs with each other. Factors that the OEB should consider when comparing distributors should be similarity of size, density and geographic spread.• Just and reasonable rates: Some suggested that PBR must ensure that customer rates are just and reasonable and that there is balance between the interests of the shareholder and customer.

- **Incentives and Penalties:** Some proposed that once benchmarks have been established by the OEB, the PBR framework could include a mechanism for measuring LDC performance against the benchmarks. Penalties should be imposed on LDCs that do not achieve requirements and incentives established to reward those which exceed requirements.

*Other
Regulatory
Issues*

Many LDCs also commented on the regulatory burden imposed in the electricity market, particularly the increased costs associated with regulatory and reporting requirements. It was noted that the regulatory burden works against efficiencies.

Some participants expressed concern that the OEB may not be utilizing all the information collected from the LDCs and that reporting requirements should be revisited.

Many participants agreed that the market would benefit from “light-handed regulation”, and suggested that the industry is, to a large extent, self-monitored. Some presenters also indicated that the Board should use a longer review timeframe for regulation, thus providing time for the distributors to invest in efficiency improvements.

There is concern among some that a level playing field does not exist among the different sized distributors. For example, one participant indicated that the OEB’s costs are not equally spread across the distribution sector and larger distributors bear a larger portion of the cost because of size in spite of the fact that distributor interaction with the OEB is the same. The participant noted that there should not be any special treatment of distributors.

There was a general agreement among participants that in determining regulation for the distribution sector, the OEB consider the uniqueness of distributors and not apply a one size fits all approach.

Finally, some participants requested that the OEB be extremely careful when examining symmetries with the gas sector. It was recognized that there are lessons to be learned from the experience of regulating natural gas, but it was also noted that there are key differences that should be taken into account (e.g. gas can be stored) and that “forced symmetries” should be avoided.

5. Load Serving Entities

There was also a fair amount of discussion regarding the Load Serving Entities (LSE) role and the potential for distributors to perform that role. It was noted that LSEs have been used in other markets, either as intermediaries in the development of the market, or as part of the overall design of the market. It was also noted by participants that in other markets those roles are often assumed by entities that are different from the distribution companies, and that in the United Kingdom market, the trend seems to be the removal of all risks related with this activity from the distribution company. Finally, a participant indicated that the LSE concept goes against the structure of the gas market as well as the separation principles established in the MacDonald report.

LSE Definition

The participants indicated that the lack of definition regarding the LSEs makes it difficult to assess the implications for distributors and the impact on efficiency.

Different views were presented regarding what role LSEs should have in the market. It was commonly understood that LSEs would be a provider of last resort, and that they would provide price stability for customers. It was also understood that LSEs would procure power through bilateral contracts, with some forward prices and spot market purchases to manage demand variances.

It was also indicated that a mark-up should be used to allow for the assumption of risk, or that a mechanism should be established to ensure that the LDC is not exposed to the commodity risk. The mark-up would also prevent the LSE from selling power at a price below other offerings (e.g. retailers)

Some participants produced proposals on how the LSE model should be structured. One proposal also indicated that the OEB may want to mandate the generation mix required on bilateral contracts, including:

- Ensuring that early LSEs do not capture all the low-cost base-load generation, leaving other LSEs with more expensive power for their customers.
- Providing guidance and incentives to the market on what kind of generation is required to satisfy the policy objectives of the province (e.g. replacing coal with renewal energy).

It was also suggested that tradable credits could be used to achieve the appropriate mix.

The discussion also highlighted the additional burden that might be imposed on already stretched LDCs from undertaking the LSE role.

***Skill Sets
Required***

Some of the presenters were of the opinion that the skill set required for participating as an LSE was very different from the core competences required for distribution. In fact, it was pointed out that the LSEs required the same skill set as retailers. As a result, some participants indicated that distributors were not suited to perform as LSEs. However, distributors with retailer affiliates did indicate that they have developed the skill set required through their affiliates.

***Participation as
an LSE***

There was consensus among participants that participation as an LSE should be, at the very least, on a voluntary basis. On the other hand, a few were opposed to the very concept of having LDCs act as LSEs.

One of the proposals presented included the OEB issuing LSE licenses to LDCs based on the service area of a respective distributor. LDCs would have the option of choosing to be the LSE in the service area, contracting out the service area or returning the LSE license to the Board which would put the license up for auction or assign it to another party.

Some participants proposed the option of a centralized buying agency for the whole province; however various presenters indicated that this approach should be used only as a transitional measure, because:

- It would place a liability on the Government's balance sheet
- The track record of central agencies managing power in Ontario is not encouraging

Such a large entity would be distanced from and have no knowledge of the local consumer and in particular, customer behaviour and load forecasting.

Risk Factors

It was also noted that the main role of an LSE would be to mitigate the risk to customers when dealing with a volatile spot market. However, there was some discussion regarding who owns the risk in the end. A number of views was presented ranging from risk to the final customer, the distributor, the LSE or even the IMO.

A bond rating agency presented its views and explained that the risk factors related to an LSE would be examined and would impact the credit rating of the owners of the LSE. It was perceived that unless the government introduced risk mitigation measures, acting as an LSE would increase the risk profile of a distributor and may potentially impact the credit rating and thus the cost of capital.

*Environmental
Requirements
for LSEs*

To function efficiently, LSEs would require the existence of liquid markets, especially a forward market to facilitate long-term contracts at stable prices. In that regard, it was suggested that the impact of heritage power on market liquidity should be considered. If the heritage power is not traded, it would result in an illiquid market.

It was also noted that the establishment of an LSE should not result in conditions that would act as a detriment to retailers (e.g. cross subsidization if the LSE business was included with the distribution business).

6. Conservation, Distributed Generation and Demand-Side Management

Conservation Today

Distributors indicated that the current rate framework penalizes distributors for conservation and Demand-Side Management (DSM) measures. It was proposed that distributors should be compensated for incurring expenses in DSM that would ultimately reduce their revenue.

Distributed Generation

One submission also explored the concept of distributed generation as an alternative to conservation. It was noted that with the correct measures in place, distributed generation would allow distributors to:

- Defer capital expenditures in transformation stations and transmission grid expansions
- Increase grid reliability and resilience
- Reduce losses and increase voltage quality
- One presenter expressed doubts about the benefits of the locational marginal pricing model proposed by the IMO

Conservation and DSM in an LSE

A few presenters noted that conservation and DSM should be part of the portfolio of power available to an LSE or to a retailer.

List of Presentations

Oral presentations given at the OEB's Review of Further Efficiencies in the Electricity Distribution Sector: February 17 to 19, 2004

	Presenter	Representing
<i>Tuesday, February 17</i>		
1	Jim Hogan , Regulatory Officer, Dave Kenney , President, James Wickett , Solicitor, Raphael Partners	Chatham Kent Hydro, Municipality of Chatham Kent and Middlesex Power Distribution
2	Ron Ross , General Manager Anthony Koziol , Vice Chair	North Bay Hydro Distribution Limited
3	Dan Allegretti , Vice-President, Regulatory & Origination, Constellation Power Source Inc. Leigh Anne-Palter , Director, Regulatory Affairs, EPCOR Gregory Baden , Vice-President, Coral Energy Canada Inc.	Energy Market Investment Group
4	William P Taws , Partner, Deacon Taws	Midland Power
5	Bruno Silano , President, Local 1 Toronto Dharam Boodhoo , Treasurer and Co-Chair of the Electricity Utility Workers Coordination Committee Antoni Sheldon , Executive Assistance, CUPE Ontario	Canadian Union of Public Employees
6	Don MacKinnon , President	Power Workers' Union
7	Jim Huntingdon , General Manager	Niagara on The Lake Hydro Inc.
8	Charlie Macaluso , CEO Ed Houghton , Chair	Electrical Distributors Association
9	Ed Houghton , President & CEO, COLLUS Darius Vaiciunas , Load Management & Regulatory Coordinator, COLLUS	Centre Wellington Hydro COLLUS Power Grand Valley Energy Innisfil Hydro Distribution Orangeville Hydro Rideau St. Lawrence Distribution Wasaga Distribution West Coast Huron Energy Westario Power

	Presenter	Representing
10	Chris Litschko , President and CEO,	Lakeland Power
11	Brian Weber , President	Grimsby Power
12	Dan Mathieson , Mayor of Stratford and Director of Festival Hydro	Festival Hydro

Wednesday, February 18

13	Ray Tracey , President & CEO, Essex Power Lines	Essex Powerlines Erie Thames Powerline
14	Nick Iozzo , General Manager, Nexgen Utilities Tanya Carinci , Director of Policy, UDI	Urban Development Institute
15	Bryan Boyce , Chair	Halton Hills Hydro
16	John Brace , President, Northland Power Ron Charie , President, Kitchener Wilmot Hydro	Northland Power Kitchener Wilmot Hydro
17	Joan Huzar , President	Consumers Council of Canada
18	David McFadden , Partner, Gowlings Lafleur Henderson	Markham Hydro, Hydro Vaughan, and Richmond Hill Hydro
19	Tom Adams , Executive Director	Energy Probe
20	Paul Ferguson , President	Newmarket Hydro Inc.
21	John Wiersma , President & CEO	Veridian
22	John Alton , President, PenWest & Chair of NEPPA	PenWest Utilities Niagara Erie Public Power Alliance (NEPPA)
23	Vinay Sharma , Vice-President of Consumer Services and Strategic Planning Mark Rosehart , Manager Analysis and Research	London Hydro
24	Aleck Dadson , Senior Vice President, Indy Butany DeSouza , Manager, Government Regulatory Affairs	Direct Energy
25	J. Mark Rodger , Partner, Borden Ladner Gervais Dr Adonis Yatchew , University of Toronto	Coalition of Ontario Distributors

	Presenter	Representing
26	James B. Richardson	Sub Group: Aurora Hydro Innisfil Hydro Newmarket Hydro North Bay Hydro Orillia Power Parry Sound Hydro Tay Hydro
27	Mark Renaud , Vice Chairman	Tillsonburg Hydro Inc.

Thursday, February 19

28	Barry Chuddy , Vice-President Business Development and Marketing, Enersource John Wiersma , President & CEO, Veridian Ron Clark , Partner, Power Budd LLP	The DEEP Group: Enersource Hydro Mississauga Inc. Erie Thames Power Oshawa PUC Networks Veridian Connections London Hydro Hydro Vaughan Distribution Oakville Hydro Electricity Distribution
29	Dale Struthers , O&Y Enterprise and Chair BOMA Strategic Energy Committee	Building Operators and Managers Association (BOMA)
30	Nicole Martin , Associate Director	Standard & Poors
31	Geoff Ogram , Vice-President Strategy and Development	Hydro One Networks Inc.
32	Roger White , President	Energy Cost Management Inc.
33	Robert M. Watters , Senior Vice-President	Borealis Capital
34	Bernard Jones , President and CEO	Ontario Energy Association

List of submissions

Written presentations received in the OEB’s Review of Further Efficiencies in the Electricity Distribution Sector.

Stakeholder	
1.	Association of Municipalities of Ontario (“A.M.O.”)
2.	Atikokan Hydro Inc.
3.	Brantford Power
4.	Centre Wellington Hydro Ltd.
5.	Chatham-Kent Hydro Part 1 - Utility Part 2 - Submission
6.	Coalition of Ontario Distributors (“The Coalition”) Aurora Hydro Connections Limited Brant County Power Inc. Brantford Power Inc. Center Wellington Hydro Ltd. Chapleau Public Utilities Corporation Collus Power Corp. Cooperative Hydro Embrun Inc. ELK Energy Inc. Festival Hydro Inc. Fort Frances Power Corporation Grand Valley Energy Inc. Gravenhurst Hydro Electric Inc. Haldimand County Hydro Inc. Hydro 2000 Inc. Innisfil Hydro Distribution Systems Limited Lakefront Utilities Inc. Midland Power Utility Corporation Niagara-on-the-Lake Hydro Inc. Norfolk Power distribution Inc. Northern Ontario Wires Inc. Orangeville Hydro Limited Orillia Power Distribution Corporation Ottawa River Power Corporation Parry Sound Power Corporation Peterborough Distribution Inc.

	<p>St. Thomas Energy Services Inc. Tay Hydro Electric Distribution Company Inc. Tillsonburg Hydro Inc. Waterloo North Hydro Inc. Welland Hydro-Electric System Corp. Wellington North Power Inc. Westario Power Inc. Whitby Hydro Electric Corp. Woodstock Hydro Services Inc.</p>
7.	COLLUS Power Corp.
8.	Consumers Council of Canada
9.	CUPE Local One (Toronto Hydro workers) and the Electrical Utility Workers' Coordinating committee on behalf of CUPE Ontario - Word only
10.	DEEP Group (The Distributors' Electricity Efficiency Policy Group) - includes a diverse group of distribution utilities, including Erie Thames Powerlines, Enersource Hydro Mississauga, Veridian Connections, Oshawa, Vaughan Hydro, London Hydro and Oakville Hydro
11.	Direct Energy
12.	E4 Inc.
13.	ECMI-Energy Cost Management Inc.
14.	EDA - Electricity Distributors Association
15.	Energy Probe
16.	Enersource Corporation
17.	ENWIN Powerlines
18.	Erie-Thames Power, Essex Power Corporation & Oncor Utility Solutions Canada Ltd.
19.	FortisOntario Inc.
20.	Gord Eamer Enterprises
21.	Greater Sudbury
22.	Grimsby Power Incorporated
23.	Guelph Hydro-Electric Systems Inc. ("Guelph Hydro")
24.	Halton Hills Hydro
25.	Hamilton Hydro

26.	Hydro2000
27.	Hydro One Inc.
28.	Hydro Ottawa Limited
29.	Kingston Electricity Distribution Limited
30.	Lakefront Utilities Inc.
31.	Lakeland Power Distribution Ltd.
32.	London Hydro (Word only, no PDF, contacted Mark Rosehart at roseharm@LondonHydro.com)
33.	Midland PUC
34.	Newmarket Hydro
35.	Niagara Erie Public Power Alliance (“NEEPA”)
36.	Niagara-on-the-Lake
37.	North Bay Hydro
38.	Ontario Energy Savings Corp
39.	Orangeville Hydro
40.	Orillia PDC
41.	Oshawa PUC
42.	Ottawa River Power Corp
43.	Peninsula West Utilities Limited (Pen West Utilities)
44.	Power Workers Union
45.	PUC Distribution Inc.
46.	Rideau St Lawrence Distribution Inc.
47.	Stratford, City of

48.	Sub Group - Aurora Hydro, Innisfil Hydro, Newmarket Hydro, North Bay Hydro, Orillia Power, Parry Sound Hydro and Tay Hydro- written submission and text of oral submission
49.	Toronto Hydro
50.	TransCanada Energy Ltd.
51.	UDI-Urban Development Institute/Ontario
52.	Veridian Corporation
53.	Vulnerable Energy Consumers Coalition (VECC)
54.	Welland Hydro
56.	Wirebury Connections Inc.
57.	Woodstock Hydro Services Inc.