



PROPOSAL

**Distributor Conservation
and
Demand Management
(DCDM)**

TABLE OF CONTENTS

1.	INTRODUCTION	1
1.1	Principles.....	1
2.	BLUEWATER POWER’S DCDM PORTFOLIO – THE PROGRAMS	2
2.1	Bluewater Power Green Team	2
2.2	Distributed Generation.....	3
2.3	Community Outreach.....	4
2.4	Web Based Energy Toolbox	5
2.5	Seasonal LED Lights	6
2.6	Traffic Light/Streetlight Program	7
2.7	Fridge Buy Back Program/ Room Air Conditioner Exchange Program.....	8
2.8	Business Product Incentive Program	9
2.9	Low Income Consumer Perspective to DCDM	10
2.10	Memberships.....	11
2.11	Load Control Pilot.....	12
2.12	Energy Data Management System Implementation - Back Office System for DCDM and Smart Metering.....	13
2.13	Smart Meter Pilot Program	15
3.	PROGRAM SUMMARY	16

1. INTRODUCTION

Bluewater Power Distribution Corporation is a progressive utility providing electrical distribution and related services to approximately 35,000 customers in Southwestern Ontario. Bluewater Power was formed in 2000 upon completion of a merger of the Sarnia Hydro-Electric Commission, Petrolia Public Utilities Commission, Point Edward Public Utilities Commission, Warwick Hydro-Electric Commission, Alvinston Public Utilities Commission and Oil Springs Hydro-Electric Commission.

Bluewater Power strives to deliver energy efficiencies and intends to leverage on its position within the community to assist customers in their efforts to curtail energy consumption, thereby reducing demand and at the same time reducing the bottom line of their monthly invoice.

Bluewater proposes to introduce a program of Distributor Conservation and Demand Management (DCDM) initiatives to achieve greater energy efficiencies.

1.1 Principles

Bluewater Power's Distributor Conservation and Demand Management program is guided by several key principles:

- Promotion of energy efficiency with the focus on demand control especially during peak times.
- Stresses flexibility and balance and includes a mix of core and supplemental programs allowing room for mid-course corrections.
- The programs address all customer rate classifications including low-income consumers particularly the impact "behind the meter".
- Leveraging on existing infrastructures.
- All programs will be measurable and tracked for reporting purposes and to ensure prudence where identifiable.

2. BLUEWATER POWER'S DCDM PORTFOLIO – THE PROGRAMS

Bluewater Power has identified the following programs as part of our DCDM portfolio. Bluewater Power is committed to delivering these programs and seeks OEB approval in whole of the entire portfolio.

2.1 Bluewater Power Green Team

Green Team Program Description

Bluewater Power feels it is important that our own employees have a clear understanding of the conservation culture that we are developing in the province of Ontario and it is our intention that our employees will carry that message out to the community and be an example to family, friends and neighbours.

Bluewater Power will develop and implement a plan involving employees from a cross section of the corporation. The responsibilities will include identifying and taking action on energy saving opportunities within Bluewater Power. Improving energy efficiencies and establishing energy management initiatives to reduce demand will be the goal of the team. The Bluewater Power facility will be a showcase within the community. Reporting and measurement will be included.

Additional funding opportunities will also be explored and applications will be filed where applicable.

Green Team Program – Affected Customer Class

Bluewater Power's Green Team program is intended to affect all customer classes. By taking the message to family members, friends and neighbours we intend to convey conservation to the mass market. The Bluewater Power facility will be a showcase of energy efficiencies for the commercial market.

Green Team Program Budget

Bluewater Power Green Team			
Year	Operating Expense	Capital Expenditure	Total
2005	\$5,000.00	\$50,000.00	\$ 55,000.00

2.2 Distributed Generation

Distributed Generation Program Description

Distributed generation behind the customer's meter is a highly effective means to reduce demand and offers an opportunity to displace load from the local distribution company. Bluewater Power currently sits on the Sarnia-Lambton Economic Partnership energy committee. The committee is exploring the possibility of using alternative energy technologies as a basis for economic diversification. As an example, hydrogen has been identified as an emerging sector and this may be a good fit for our DCDM portfolio.

Bluewater Power is looking to develop a demonstration project either on our site or perhaps in co-operation with Lambton College. The college is currently designing an Alternative Energies Technology program and we have been invited to provide input towards the development of the course curriculum. The college is looking for working demonstration sites for the technology students and this will lend itself to partnership opportunities. The demonstration site will be highly visible and will serve to heighten awareness and engage local industry and the community at large. It will be 100% behind the meter.

Distributed Generation Program – Affected Customer Class

Bluewater Power's distributed generation program will focus on commercial customers. Ultimately, however, all customer classes will benefit from a reduction on system demand.

Distributed Generation Program Budget

Distributed Generation			
Year	Operating Expense	Capital Expenditure	Total
2005	\$10,000.00	\$80,000.00	\$ 90,000.00

2.3 Community Outreach

Community Outreach Program Description

Bluewater Power kicked off our community outreach programs with the introduction of Community Tent Events in August 2004 to coincide with the anniversary of the Blackout. The tent events serve as an informal meeting place for a neighbourhood to meet and discuss energy and conservation with employees of Bluewater Power. It was an opportunity to meet our customers and answer their questions and address their concerns face to face. We also provided our customers with low cost energy saving tips, provided lighting and a smart metering display and promoted existing programs such as EnergyStar and EnerGuide for Houses from Natural Resources Canada. We partnered with an internet service provider to showcase their wireless capabilities thinking that down the road potentially this ISP will provide a link to an AMR collector. Customers were asked to complete an energy survey and in return we provided them with a free EnergyStar compact fluorescent light bulb.

Bluewater Power sees the Community Tent as an educational activity that targets residential customers. We advertised in local newspapers, did mail drops in specific neighbourhoods and visited schools to promote the events. We visited each of our shareholder municipalities and invited local dignitaries and media. This follows a formula that works very well for Bluewater Power and demonstrates our commitment to our community. We plan to commence the tent events again in the summer of 2005.

Bluewater Power and Radio Sarnia Lambton have started a series of conservation spots. These 15 second radio spots provide energy saving tips such as switching incandescent light bulbs to compact fluorescents, caulking and weather stripping and promoting EnergyStar appliances. These conservation promos have the potential to reach 74% of all adults in Sarnia-Lambton and will serve to blanket all rate classes.

Bluewater Power plans to target our smaller general service, commercial and industrial customers with morning coffee pot sessions or lunch and learn seminars. We are partnering with the Sarnia Lambton Chamber of Commerce to facilitate these presentations. Examples of such events would include presentations by the IMO on wholesale market prices and a presentation on the Energy Innovators Initiative (EII) offered by Natural Resources Canada. Future partnerships may include the Cool Shops program offered by the Clean Air Foundation.

Community Outreach Program – Affected Customer Class

Bluewater Power's community outreach program will engage all customer classes with the emphasis on the residential mass market.

Community Outreach Program Budget

Community Outreach			
Year	Operating Expense	Capital Expenditure	Total
2005	\$16,100.00	\$10,000.00	\$ 26,100.00

2.4 Web Based Energy Toolbox

Web Based Energy Toolbox Program Description

Targeted at the residential customer this internet based toolbox would be housed at www.bluewaterpower.com. It would provide useful information to help customers save money on their energy bills and it would help identify ways to reduce energy consumption. Do it yourself on line home energy audits, an appliance calculator and a link to the EnerGuide for Houses will be provided as tools required to reduce energy usage. An e-newsletter will be developed to update customers on Energy events, news and Energy tips. Bluewater Power is currently completing an administrative arrangement with EnergyStar and an area in the toolbox will be dedicated to the promotion of EnergyStar products.

Web Based Energy Toolbox – Affected Customer Class

Bluewater Power's web based energy toolbox will target the residential mass market.

Energy Toolbox Program Budget

Web Based Energy Toolbox			
Year	Operating Expense	Capital Expenditure	Total
2005	\$5,000.00	\$8,000.00	\$ 13,000.00

2.5 Seasonal LED Lights

Seasonal LED Lights Program Description

This program is based on a similar plan introduced by BC Hydro where education and incentives provide the basis for a successful DCDM offering. The LED technology is superior to standard incandescent light strings; they use 95% less energy, last longer and have lower waste heat thereby reducing the risk of fire. The last point fits in very nicely with the LDC's seasonal safety tips and is education related. Bluewater Power will be seeking to implement this program during the 2005 holiday season, whereby we will partner with a retailer, either as part of a local or national campaign, to provide an in-store coupon for purchase of a LED light string to a customer who returns an incandescent holiday light string.

Partnership opportunities exist with the annual Celebration of Lights display held at Centennial Park, ranked as one of Ontario's top 50 festivals.

Seasonal LED Lights Program – Affected Customer Class

Bluewater Power's Seasonal LED Lights program will target the residential mass market.

Seasonal LED Lights Program Budget

Seasonal LED Lights			
Year	Operating Expense	Capital Expenditure	Total
2005	\$10,000.00	\$5,000.00	\$ 15,000.00

2.6 Traffic Light/Streetlight Program

Traffic Light Program Description

Upgrade existing incandescent traffic signals to energy efficient LED traffic signals. LED traffic signals are long life thereby reducing maintenance and offer improved brightness with very low power consumption. The program will demonstrate significant energy savings as proven in British Columbia.

Traffic Light Program – Affected Customer Class

Bluewater Power's traffic light program will specifically target our municipal shareholders on a cost sharing basis.

Traffic Light Program Budget

Traffic Light Program			
Year	Operating Expense	Capital Expenditure	Total
2005	\$5,000.00	\$10,000.00	\$ 15,000.00

2.7 Fridge Buy Back Program/ Room Air Conditioner Exchange Program

Fridge Buy Back/Room Air Conditioner Exchange Program Description

An education and incentive based program used successfully in other jurisdictions. The second fridge out in the garage or down in the basement may do the job but how much is it costing on the energy bill? We would educate and provide an incentive for customers to return an old inefficient fridge provided it was still in working order. Free pick and proper disposal of the unit along with a financial incentive are possibilities.

A similar program would be offered for room air conditioners. Education would be provided to heighten public awareness and financial incentives would be offered to encourage the retirement of energy inefficient room air conditioners. The units collected would be recycled 100%.

This program lends itself to a partnership between Bluewater Power and Chatham Kent Hydro to improve economies of scale.

Fridge Buy Back/Room Air Conditioner Program – Affected Customer Class

Bluewater Power's fridge buy back and room air conditioner exchange program would be targeted towards the residential mass market and the small commercial customer classes.

Fridge Buy Back/Room Air Conditioner Program Budget

Fridge Buy Back Program			
Year	Operating Expense	Capital Expenditure	Total
2005	\$18,000.00	\$2,500.00	\$ 20,500.00

2.8 Business Product Incentive Program

Business Product Incentive Program Description

Specifically designed to help organizations reduce energy costs and save money. The program will provide financial incentives to business customers who replace existing inefficient products with energy efficient technologies. It will include lighting products, controls and sensors and adjustable speed drives in HVAC applications.

Existing programs with the Office of Energy Efficiency (OEE) will be utilized wherever applicable. Registration applications have already been completed to attend three OEE Dollars to Sense workshops pertaining to energy saving opportunities within business facilities.

Business Product Incentive Program – Affected Customer Class

Bluewater Power's business product incentive program will target our commercial customer base.

Business Product Program Budget

Business Product			
Year	Operating Expense	Capital Expenditure	Total
2005	\$15,000.00	\$8,000.00	\$ 23,000.00

2.9 Low Income Consumer Perspective to DCDM

Low Income Consumer Program Description

Whereby 14.4% of the Ontario population lives at or below the poverty line and spend 40% of their pre-tax income towards housing and utilities, DCDM must be recognized as a public benefit and not be exclusive to only those who can afford it. Bluewater is proposing the development and design of an energy conservation program targeted at low income households. An ongoing education strategy would be developed to build low income consumer knowledge on energy conservation. We would look at removing the cost barriers facing low income consumers, many who simply can not afford to participate in DCDM initiatives. We would explore “pay as you save” programs that have been used in the U.S. and renovation rebate programs that have been used for electric heated homes, townhouses and apartments. There is a connection between low income housing and electric heat in the Sarnia Lambton area.

Bluewater Power will also utilize the relationship we have built with the Inn of the Good Shepherd, a local social service organization, to assist in the consultation process as we move forward developing a comprehensive plan.

Low Income Consumer Program – Affected Customer Class

Bluewater Power will be specifically targeting low income earners within our residential mass market customer base.

Low Income Consumer Program Budget

Low Income Consumer			
Year	Operating Expense	Capital Expenditure	Total
2005	\$17,000.00	\$10,000.00	\$ 27,000.00

2.10 Memberships

Membership Program Description

Bluewater Power will continue to explore membership opportunities especially with those organizations focusing on energy efficiency. It will allow Bluewater Power to leverage on existing opportunities. The Canadian Energy Efficiency Alliance has proposed a partnership and would include an involvement with their upcoming “Switch to Cold” promotional campaign. Bluewater Power has been involved in the past with the Canadian Energy Efficiency Alliance on a local radio “Talk Back” program. Other memberships would be determined in response to opportunities that arise.

Membership Program – Affected Customer Class

The memberships that Bluewater Power would examine will be of benefit to all customer classes.

Memberships Program Budget

Memberships			
Year	Operating Expense	Capital Expenditure	Total
2005	\$5,000.00	\$0.00	\$ 5,000.00

2.11 Load Control Pilot

Load Control Program Description

Bluewater Power will pilot load control products in order to gain experience and an understanding into the benefits and pitfalls of various load control devices. The products that will be investigated could include programmable, automated and/or real time load control devices. The typical loads that would be targeted for control are substantial electrical loads that can be eliminated or shift for a defined period of time without a significant inconvenience to the end use; these types of load include pool pumps, hot water heaters, air conditioners and heating systems.

Load Control Program-- Affected Customer Class

Bluewater Power's load control pilot will focus on residential and small commercial/industrial customers. The findings of the pilot would be applicable to all customers with complementary loads.

Load Control Program Benefits

The load control pilot will allow Bluewater Power to share the knowledge gained with end users and other LDCs; this knowledge will provide end users with the confidence to invest and accept load control as a new option for their energy management actions. The right load control products are verifiable, reliable, noninvasive and cost effective.

Load Control Program Budget

Load Control Pilot			
Year	Operating Expense	Capital Expenditure	Total
2005	\$0.00	\$133,000.00	\$ 133,000.00

2.12 Energy Data Management System Implementation - Back Office System for DCDM and Smart Metering

EDM Program Description

Bluewater Power runs SAP's utility enterprise software for all of our back office system requirements. In 2003 as part of SAP's complete utility solution Bluewater Power acquired the Energy Data Management (EDM) module. Up to now we have not had reason to implement this module; the current DCDM and Smart Metering initiatives changes that. EDM is the system that will allow Bluewater Power to measure, track, monitor, benchmark and report on the vast amount of time based consumption data that will become the norm as we move forward. The early implementation of EDM is essential in order to help ensure success of our proposed DCDM initiatives.

EDM contains a variety of functions; in the proposed implementation we will enable the following functions:

- The capacity to import data from selected Automatic Meter Reading systems
- The capacity to import data from traditional meter reading systems
- The capacity to import and export data to and from the Ontario EBT HUB
- The capacity to import data from IMO web based interfaces
- The capacity to export data to our billing module
- The capacity to export data on an ad hoc basis
- The capacity to Validate, Estimate and Edit (VEE) data as required
- The capacity to manage time based consumption data assigned to specific individual accounts
- The capacity to aggregate data into various groupings for analysis (i.e. by retailer, by customer class, feeder, sub-station, meter type)
- The capacity to plot and graph data for presentation and reporting
- The capacity to forecast consumption profiles based historical data
- The capacity to perform complex rate impact analysis and 'what if' scenarios

The information that flows out from the EDM module will be used analyze, prioritize and in turn promote DCDM activities in the entire Bluewater Power service territory. Bluewater will also use the data to investigate opportunities for line loss reduction and theft of power by comparing feeder load data to end user interval consumption data. In addition the information will be used as a basis for reporting to the OEB, OPA and/or MOE.

EDM Program -- Affected Customer Class

As this is a fundamental DCDM infrastructure tool the EDM System implementation program will affect all customer classes. Initially, the affect will be direct for customers with interval meters and indirect for customers with regular energy meters

(see benefits). Ultimately, once all customers have smart meters installed all customer classes will benefit directly.

EDM Program Benefits

All customers will benefit from the analysis and prioritization of DCDM programs. Provincially, when the market opened customers had a negative experience with challenges and issues the back office systems caused; customers will benefit from the early implementation of EDM by helping to ensure a smooth transition from bulk energy metering to interval meter.

EDM Program Budget

Energy Data Management System			
Year	Operating Expense	Capital Expenditure	Total
2005	\$21,500.00	\$178,000.00	\$ 200,000.00

The EDM implementation program will begin in the 1st or 2nd quarter of 2005 and it is intended to be complete within 20 weeks. All proposed dollars relating to this program will be spent in 2005.

2.13 Smart Meter Pilot Program

Smart Meter Pilot Program Description

Bluewater Power will pilot between 250-500 smart meters in order to gain experience and an understanding into the benefits and pitfalls of various smart meters. The products that will be investigated could include Elster and/or Itron smart meters. Bluewater Power will gain practical knowledge of installations, communication, data flows and customer impacts.

Smart Meter Pilot Program -- Affected Customer Class

Bluewater Power's smart meter pilot will focus on residential and small commercial/industrial customers. The findings of the pilot would be applicable to all customers within Bluewater Power's service territory.

Smart Meter Pilot Program Benefits

The smart meter pilot will allow Bluewater Power to share the knowledge gained with end users and other LDCs; this knowledge will provide end users with the confidence to invest and accept smart meters as a new option for their energy management actions.

Smart Meter Pilot Program Budget

Smart Meter Pilot			
Year	Operating Expense	Capital Expenditure	Total
2005	\$0.00	\$35,000.00	\$ 35,000.00

3. PROGRAM SUMMARY

Bluewater Power is of the opinion that the program set forth is an effective means in establishing the province's conservation culture. This program has adhered to the principles of promoting energy efficiency, has addressed all rate classifications, stresses flexibility and balance and leverages on existing infrastructures. Bluewater Power will be able to provide filings as requested to update the Board on the progress of our design, implementation and effectiveness of our DCDM program.

Table 1 summarizes the proposed spending of our programs. These programs account for 100% of Bluewater Power's DCDM budget. It is anticipated that by the end of 2005, Bluewater Power will have invested 657,600 dollars in DCDM, an amount equivalent to our third tranche. Bluewater Power anticipates the Board's approval of our proposal and we look forward to the successful creation of a culture of conservation in the province of Ontario.

Table 1

Operating Budget	
Advertising/ PR	\$ 33,100.00
Contract Employees	\$ 21,500.00
Staff Labour	\$ 53,000.00
Summer Students	\$ 20,000.00
Total	\$127,600.00

Capital Budget	
Load Control pilot	\$133,000.00
Smart meters	\$ 35,000.00
Energy Data Management System	\$178,500.00
Energy Efficient Retrofits	\$ 50,000.00
Distributive Generation	\$ 80,000.00
Energy Website Project	\$ 8,000.00
LED Lighting - Seasonal	\$ 5,000.00
LED Lighting - Traffic - Street	\$ 10,000.00
DSM Displays	\$ 25,500.00
Testing Equipment	\$ 5,000.00
Total	\$530,000.00

RECEIVED

File 1

JUN 13 2005

June 7, 2005

06/13
gjd

ONTARIO ENERGY BOARD

John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Mr. Zych,

Re: File No. RP-2004-0203 / EB-2004-0423 Conservation and Demand Management

Bluewater Power Distribution Corp. ("Bluewater") applied for and was granted approval of our Conservation and Demand Management ("CDM") plan from the Ontario Energy Board on March 15, 2005. The total amount approved was \$657,093 which corresponds to the third installment of incremental MARR. At this time we would like to apply for a change to our CDM plan which is greater than the 20% allowed threshold for movement of funds from one program to another.

Bluewater's CDM portfolio consisted of the following 13 initiatives:

1. Green Team energy efficiency education program
2. Distributed generation
3. Community outreach
4. Web based energy toolbox
5. Seasonal LED lights
6. LED traffic lights
7. Fridge buy backs and room air-conditioner replacement
8. Business product incentive program
9. Low income consumer program
10. Memberships in energy efficiency organizations
11. Load control pilot
12. An energy data management system implementation program
13. Smart meter pilot

P.O. Box 2140
855 Confederation Street
Sarnia, Ontario N7T 7L6

Tel.: (519) 337-8201
Fax: (519) 332-3878

The **load control** initiative was included in the portfolio with the intention of working with a company providing a unique meter product. Unfortunately, we were unable to reach agreement with the meter provider and the project is unable to proceed. Subsequently, we investigated a number of other load control products and services. We have come to the conclusion that virtually all viable load control products are being tested or piloted by other Ontario LDCs. There are presently 20 other LDC's that have included load control in their CDM plans. Therefore we feel that it is not prudent to have an additional utility initiate a similar pilot project. We have been in contact with other LDCs and they have indicated that they will make their findings available to us.

As a result, Bluewater would like to re-allocate the funds associated with the load control program to two other initiatives. The budget approved for the load control program was \$133,000 all of which was to be capital expenditures.

The two other programs Bluewater would like to invest in are:

1. An additional program targeted at low income consumers
2. Residential and small commercial energy audit program.

1. Low Income Programs

The Board, in its Decision on the Coalition for Large Distributor's, urged other LDCs to review their programs targeted at low income consumers and determine whether further actions could be taken to enhance initiatives for these consumers. Bluewater has done just that. Our initial budget was \$27,000, and Bluewater is proposing to add an additional \$33,000 of operating expenses to this initiative.

The new initiative entails partnering with the primary low income service agency in Lambton County, The Inn of the Good Shepherd ("Inn"). We have identified a very unique opportunity to work with them on a multi-year conservation education program geared directly at their clients. The Inn runs a variety of programs, including a food bank, emergency shelter, and utility and rent bank assistance. The proposed program would consist of monthly or bi-monthly hands-on conservation educational seminars delivered right at the food bank location, targeted to the Inn's clients who have received assistance in the prior month(s).

In conjunction with the education seminars, Bluewater would partner with local businesses and purchase energy efficient products such as appliances and home improvement material. The energy efficient products would be used as part of the education seminars as well as in various Inn related promotions. At the end of each year the energy efficient products would be given away in a lottery-type promotion to the public, with all proceeds going to the Inn to cover the costs of the following year's conservation education program. Any funds in excess of the following year's expenses would be kept by the Inn to directly support the various programs for their clients. Bluewater Power and the Inn of the Good Shepherd have determined that it would require

an investment of \$33,000 to set-up an appropriate low-income energy efficient training center which would include the purchase of energy efficient appliances and building materials. It is anticipated that this program would run a minimum of 3 years.

The total budget for this additional Low Income Energy Efficient education seminar program is \$33,000 of operating expense. The primary target market for this program is the low income residential customer.

2. Residential and Small Commercial Energy Audit Program

Bluewater Power has held a number of neighbourhood “Energy Tent Events” (outlined in our Community Outreach Program) as well as a number of seminars focused on commercial customers. The overwhelming feedback we have received from the participants is the desire to have experts work with them to help them identify specific energy efficient improvements right in their homes and business. With these requests in mind Bluewater Power investigated what programs or services are available locally. We have determined that although there are a number of federally sponsored funding opportunities available, there are virtually no delivery agents available in the Sarnia-Lambton area to give our customers access to available grants and loans.

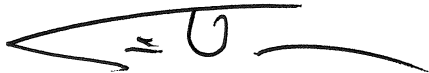
Consequently, Bluewater Power is developing a ‘Residential and Small Commercial Energy Audit Program’ to address the need for trained and equipped energy auditors in the Sarnia-Lambton area. The overall program would consist of hiring and training 2 or 3 contract energy auditors, as well as purchasing specialized energy auditing equipment. In order to promote this service, Bluewater Power would engage in extensive advertising of the energy auditing service. At the customer’s premise the energy auditor would require specific auditing equipment such as a ‘Blower Door’ depressurization tester, thermograph camera, laptop computers and portable printers, electronic temperature and light level meters as well as energy related software.

The total budget for the Residential and Small Commercial Energy Audit Program is \$100,000 with 50% capital expense and 50% operating expense. The target market for this program is the residential mass market customer and small/mid-sized commercial customers.

Bluewater Power feels these two additional programs would enhance our overall CDM portfolio and would offer two specific target groups more information on the province’s goal of a conservation culture.

In order to facilitate the requested change to the CDM plan, Bluewater Power respectfully requests the Board to consider proceeding in this matter without a hearing as per section 21 (4) of the Ontario Energy Board Act, 1998. We suggest that no party will be affected in a material way by shifting the funding from the load control program to the programs aimed at low income consumers and residential/small commercial customers. In fact, any impact is positive in the sense that our CDM program is improved and the loss in load control intelligence is negligible because other good work is being done elsewhere. Moreover, the proposed change gives Bluewater an opportunity to assist the low income consumers, as per the Board's suggestion.

If you have any further questions on this application, please feel free to contact me.

A handwritten signature in black ink, appearing to read 'Tim Vanderheide', with a stylized flourish at the end.

Tim Vanderheide
Vice President, Client Services
Bluewater Power Distribution Corporation
Phone: 519-337-8201 Ext 251
Email: tvanderheide@bluewaterpower.com