

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15,
Schedule B;

AND IN THE MATTER OF the preparation of handbook for electricity
distribution rate applications.

**Final Argument of Rogers Cable Communications Inc. and the Canadian
Cable Telecommunications Association**

February 14, 2005

Elisabeth (Lisa) DeMarco
Macleod Dixon LLP
Toronto-Dominion Centre
Canadian Pacific Tower
100 Wellington Street West
Suite 500, P.O. Box 128
Toronto, ON M5K 1H1

Telephone : (416) 203-4431
Facsimile: (416) 360-8277
Email: elisabeth.demarco@tor.macleoddixon.com

*Counsel for Rogers Cable Communications Inc.
and the Canadian Cable Telecommunications
Association*

1. The Board's unique process and directions in the RP-2004-0188 proceeding have resulted in a unanimous consensus on the treatment of Unmetered Scattered Loads in the 2006 Draft Electricity Distribution Rate Handbook (the "Draft Handbook"). The Board is therefore urged to adopt the full consensus found in section 10.2 of the Draft Handbook, as a success resulting from the laborious RP-2004-0188 process.
2. Rogers Cable Communications Inc. ("Rogers") is an integrated cable and communications company that receives electricity for its power supplies from Local Electricity Distribution Companies ("LDCs") throughout the Province of Ontario. The Canadian Cable Telecommunications Association (the "CCTA") represents 79 Canadian cable companies that provide advanced media in the home through a wide range of services. The cable industry provides television services to 7.2 million subscribers and cable high-speed internet access to 2.3 million Canadians.
3. Rogers and the CCTA respectfully submit that the Board should approve the consensus on Unmetered Scattered Load ("USL"), as set out in s. 10.2 of the Draft Handbook on the grounds that:
 - (a) the USL consensus constitutes an equitable interim solution, which moves toward addressing the untenable variability in electricity distribution rates currently experienced by Rogers and other USL customers across the province of Ontario;
 - (b) the process to achieve the full consensus was more extensive, inclusive and involved than the Board's traditional settlement negotiation processes; and
 - (c) the customer impact associated with implementing the consensus and thereby attenuating some of the unacceptable variability in USL distribution rates is minimal.

A summary of the full consensus on USL and an elaboration on each of these grounds follows.

The Issue

4. In each LDC territory that Rogers operates in, its power supplies draw electricity from LDCs in essentially the same manner. As a result, one would expect that the electricity distribution rates that Rogers pays as an unmetered scattered load customer would be consistent among the many LDCs that provide it with electricity distribution services.
5. In fact, the fixed distribution service charges that Rogers pays vary from less than \$1/connection to more than \$40/connection - a greater than 40-fold (4000%) difference among LDCs. Moreover, Rogers' average total distribution charges range from 0.57 cents/kWh to 10.85 cents/kWh thereby constituting a 20-fold difference among LDCs (Exhibit B.5, p.1, para.4).
6. The Region of York highlights some of the practical challenges and consequences resulting from the current and varying treatment of USL in its letter to the Board on the same, dated December 20, 2004 (Exhibit D.2.3, Tab 3), which concludes that:

"Exercising due diligence on behalf of the taxpayer, we consider it critical that the issue of inappropriate application of customer service and distribution charges to street lighting and traffic signal accounts is resolved."

7. It was in the context of the considerable and inexplicable rate variability for USL customers that the Board ruled that:

However, the Board does consider that the anomaly presented by unmetered, scattered loads should be addressed in this process. The differences between utilities are sufficiently significant, and the issues are sufficiently urgent, that the Board will entertain evidence and argument on this issue. ...The Board wishes to indicate that it is preferable that the Working Group resolve, or at least narrow, the issues involved in the unmetered, scattered load question. The Board particularly encourages the development of an interim solution from the Working Group, as the matter is likely to be revisited in the 2007 cost allocation study. (Transcript, Issues Day, v.3, lines 27-29)

The Consensus

8. Following the Board's direction, and over the period from November 3, 2004 to December 3, 2004, the Working Group worked diligently to create, analyse, criticise, and compromise in order to arrive at the single consensus position on the treatment of electricity distribution rates for USL customers, as set out in s.10.2 of the Draft Handbook (attached hereto as Appendix "A"). It has four basic parts (Transcript, v.2, lines 146 - 156).

The first part sets out two classes of distributors that will have no change to the manner in which they calculate and apply rates to USL customers. These distributors that are not affected by the USL consensus ("*status quo* distributors") include: (i) distributors that currently charge USL customers on a per customer, and not a per connection point, basis, and the amount of the charge is less than or equal to the General Service ("GS") <50kW monthly service charge per customer; and (ii) distributors that have developed and implemented a unique level of monthly service charge payable by USL customers.

The second part indicates that only distributors that currently bill USL customers on a per connection point basis using a small commercial or GS <50kW monthly service charge ("*applicable* distributors") will be required to change the monthly service charge to 50% of the GS <50 kW monthly service charge, which will be applied on a per connection point basis.

The third part provides that *applicable* distributors, which are the only distributors that are subject to an interim reduction in USL charges, will be kept whole. Any revenue shortfalls will be recovered by being re-allocated over all customer classes/groups, in proportion to the class's/group's distribution revenue, and recovered from all of the *applicable* distributor's customers, including USL customers, through both the fixed and variable portion of their distribution rates.

The fourth part provides that the methods used by distributors to estimate load profile and energy consumption for USL is outside of the interim solution on USL. However, if a reasonable estimate of a USL customer's consumption is required, the customer will receive advance notice of both the proposed method of estimation and the cost.

9. Rogers therefore submits that the Board should unconditionally approve the consensus – as set out in s.10.2 of the Draft Handbook – as the consensus constitutes an equitable interim solution, which moves toward addressing the untenable variability in electricity distribution rates currently experienced by Rogers and other USL customers across the province of Ontario.

Support for the Consensus

10. This consensus - as written in section 10.2 of the Draft Handbook - was unconditionally supported by all of the parties including: (i) the rate design experts of Rogers and Energy Cost Management Inc.(Exhibit B.5, Transcript, v.2, lines156-158, 180-184); (ii) all members of the Working Group and Joint Executive Committee, including Energy Probe, Kitchener, VECC, Elenchus, RDII and Schools (Transcript, v.2, lines131-141, 188, 262-263); and (iii) the interested public (Transcript, v.2, lines 141-143).
11. The complete list of parties that were involved in crafting , negotiating and arriving at the only consensus on the treatment of USL (as set out in s. 10.2 of the Draft Handbook) is found at tab 2 of Exhibit D.2.3, (attached as Appendix B to this document) which lists the full membership of the Working Group (Rate Design and Cost Allocation Sub-Group, Chapters 4 and 5 – Cost Allocation and Distribution Rate Design), and the two Executives that oversaw the Working Group through Executive and Joint Executive meetings of the Rate Design and Cost Allocation Executive Group and the Rate Base and Revenue Requirement Executive Group (Transcript, v.2, lines108-112).
12. The consensus therefore represents the work, analysis, creativity, and compromise of numerous parties representing large and small LDCs (35 total), ratepayer groups (6 total), and non-governmental organisations (3 total). Mr. Vagg, summarised the breadth of the participation in the consensus on USL, as set out in s.10.2 of the Draft Handbook, indicating:

In summary, there is [sic] about 35 LDCs, either participating on their own or through their consultants. These range from large distributors, such as Toronto Hydro and Hydro One, as well as some smaller hydros such as Haldimand County Hydro, Niagara Falls Hydro, Peninsula West Power and Welland Hydro. There was also approximately six ratepayer groups involved. Such groups consisted of Schools, AMPCO, Consumers Council of Canada. And there was also three non-government organisations that participated, such as Energy Probe. And many of these groups, such as Energy Probe, just naming one, was involved within various aspects of reaching consensus, both in the working group and the executive.(Transcript, v.2, lines 112-113).

The Process

13. The process to achieve the USL consensus was very thorough, time-consuming and involved. At its start, both Mr. Vagg and Mr. White confirmed that the parties were of opposite minds on the treatment of USL. Specifically they stated:

MS. DEMARCO: Can you comment on the views of the stakeholders, Mr. Vagg, when you started the negotiations on unmetered scattered load?

MR. VAGG: The views of the participants were very strong, and I would go as far as saying that some of the views were actually polar opposites within the working group.

MS. DEMARCO: Mr. White can you comment on the views of the stakeholders at the start?

MR. WHITE: I would agree with Mr. Vagg. The views of the participants who ultimately reached a compromised position were divergent, and in the absence of the Board's direction on issues day, I'm not convinced that a compromise would have been reached. (Transcript, v.2, lines 113-117)

At its conclusion, the same involved parties had arrived at the single consensus position set out in s.10.2 of the Draft Handbook.

14. The process included consideration of at least 9 options, rate impact analysis on 3 options (including variants within each of those options), development of a common spreadsheet template to facilitate uniform comparisons among LDCs, and further rate impact analysis and compromise to arrive at the single consensus position supported by all parties that is set out in s.10.2 of the Draft Handbook .
15. The numerous calls, meetings and submissions involved in the process to achieve the consensus set out in s. 10.2 are summarised in the Joint Evidence of Rogers and ECMI (Exhibit B.5 p.2-3, para. 11) and in the direct evidence of Mr. Vagg, of Rogers (Transcript, v.2, lines 108- 143). In addition to the extensive and time consuming efforts of the Working Group, the process to approve the USL consensus involved *de novo* consideration of the consensus by the Rate Design and Cost Allocation Executive, and subsequently the Rate Base and Revenue Requirement and Rate Design and Cost Allocation Joint Executive. Further, the only evidence filed on the subject of the USL consensus, as set out in s.10.2 of the Draft Handbook, was the Joint Evidence filed by Rogers and ECMI in support of the consensus. No parties filed reply evidence in dissent (Transcript, v.2, lines 80-81, 161-180). Moreover, the consensus was once again subject to scrutiny and review by all interested members of the public at the public meetings on the Draft Handbook held at the Ontario Science Centre on December 15 and 16, 2004 (Transcript lines 141-143).
16. Rogers therefore submits that the process to achieve the full consensus on USL, as set out in s. 10.2 of the Draft Handbook, was, in fact, more extensive, inclusive and involved than the Board's traditional settlement negotiation processes. Consequently, the Board should provide a heightened level of consideration to preserving the consensus as written,

and should not, therefore, alter such a significant consensus resulting from such an extensive, inclusive and involved process.

The Impact

17. Rogers submits that the Board can fairly discharge its duties to: (i) protect the interests of consumers with respect to prices and the adequacy, reliability and quality of electricity service; and (ii) promote economic efficiency and cost effectiveness in the generation, transmission, distribution, sale and demand management of electricity and to facilitate the maintenance of a financially viable electricity industry; as set out in section 1(1) of the *Ontario Energy Board Act, 1998*, as amended, by approving the s.10.2 consensus on USL.
18. It is noteworthy that ECMI and Rogers started negotiations on USL with opposing views. Yet, the very qualified and experienced rate design consultants retained by each of Rogers and ECMI support the USL consensus as having minimal impacts on other customers. Specifically, Mr. White, of ECMI, indicated:

MR. O'LEARY: Mr. White, do you have any views as to the potential impact on any affected customers as a result of the Board approving this compromise?

MR. WHITE: We at ECMI did specific analysis on some of our customers. And with the final solution, the worst impact that we encountered was something less than two percentage points on – within a particular LDC.

So it's not a zero percent, but that was the "worst case". In our own client group, two of the customers, who – my customers had a zero impact. And others had as low as a few tenths of a percent. So the range differs as you go from utility to utility..(emphasis added) (Transcript, v.2, lines158-161).

When asked about customer impacts, Ms. Zarnett, consultant to Rogers, also indicated:

MS. ZARNETT: This is on a very estimated basis. What I did was look at 38 utilities for which I had been provided with information about the treatment of unmetered scattered loads. In some of these, they fall into the paragraph 1 of the proposal. They already have a specific rate treatment that's different from the general treatment. In those utilities there would be no change. So some of them would have a change, some of them wouldn't.

And what I did was make an estimate of the number of connections and kilo-watt hours of unmetered scattered loads in the utilities for which rates were available, and on that basis computed the dollar change that would result from a 50 percent reduction in the fixed monthly charge.

That was based on actual 2004 rates, and doesn't include anything for changes in the rates in 2005 and 2006, and does not include the fact that some of this money would be reallocated back to unmetered scattered loads themselves.

On that basis, I then looked at the number of customers in the utilities and computed that there would be, overall, about 30 cents a year of impact per customer.

So then, extrapolating that, assuming that the proportions and the relationships are the same for which I did not have data, 30 cents a year, based on 4.3 million customers in the province, is about \$1.3 million. (Transcript, v. 2, lines 229-234).

19. In summary, Mr. White indicates that several of his clients are *status quo* distributors and subject to no change. Of his clients that are *applicable* distributors, many had impacts as low as a few tenths of a percent. The worst case scenario was an impact of less than 2 percent. Ms. Zarnett estimates that - before the impacts are reallocated back to USL customers and thereby reducing the impact on all other customers - the average impacts are in the range of 30 cents per year for a customer.
20. Rogers therefore submits that these impacts are truly *de minimis* and are more than offset by the system wide efficiencies associated with attenuating some of the untenable variability in USL rates. As a result, Rogers submits that the Board should approve the USL consensus as set out in s. 10.2 of the Draft Handbook as it is consistent with the Board's legislated objectives to both protect customers and promote efficiency in distribution as set out above.

Conclusion

21. In conclusion, Rogers and the CCTA submit that the Board should approve the consensus on USL as written in section 10.2 of the Draft Handbook. The full consensus represents a fair and interim solution that was unconditionally supported by all parties who participated in the very extensive, inclusive and rigorous RP-2004-0188 process, and the impacts on other customers are very small. Such unconditional approval of section 10.2 is supported by the views of experts retained by differing parties, LDCs, rate-payer groups, and non-governmental organisations on the basis of the many reasons included by Ms. Zarnett in her recommendation to the Board.

MS. DEMARCO: One last question, Ms. Zarnett, in light of your expertise, should the Board approve the consensus on unmetered scattered load?

MS. ZARNETT: Yes, the Board should approve it. Looking at Paragraph 4 on the second page under tab 1 [of Exhibit B.5], we talk about the variability in charges to unmetered scattered loads, which on a per-kilowatt-hour basis can range between just over half a cent to nearly 11 cents per kilowatt-hour. This is a range of charges to similar customers, which is of great concern. The proposed compromise reduces, but doesn't eliminate this variability.

The proposed solution represents the results of a lot of hard work of diverse parties. There was no objection offered in the process. It has the advantage of not requiring the support of extensive analysis or [sic] individual LDCs. It is interim and, therefore, all the doors are open to reassessment of the issue once we

have the results of the cost allocation study, and the impacts of the LDCs are really very small. (Transcript, v. 2, lines 181-184).

Rogers and the CCTA therefore respectfully request that the Board approve the consensus on unmetered scattered load as it is set out in s.10.2 of the Draft Handbook.

Costs

Rogers and the CCTA are not funded parties in this proceeding. Both parties hereby reserve their right to address the issue of costs claimed upon examination of the nature and amount of costs requested by parties in the proceeding.

Chapter 10

Rates and Charges

10.0 Introduction

For the most part, existing methodologies, practices, and procedures are to be maintained for 2006, pending the cost allocation studies that will be available during the 2007 rate process. Deviations from this general approach, if necessary, are identified in the following section.

~~The first step in rate design is to divide the service revenue requirement derived in Chapter 3, into two rate-related components: base revenue requirement, and "other revenue from Board-approved rates." A third component is not rate-related, and it is not discussed further in this chapter.~~

~~The "other revenue from Board-approved rates component" is derived first, so that the base revenue requirement can be calculated as the service revenue requirement net of the two revenue offset components (see Chapter 8).~~

~~The applicant must report the following items of "other revenue from Board-approved rates" in Schedule 8.1, as a revenue offset:~~

- ~~• volume of each specific service, times the applicable charge (see Chapter 11)~~
- ~~• retailer charges: _____ volume of each retailer service, times the applicable charge~~
- ~~• SSS fees: _____ number of standard supply service customers, times the applicable charge~~
- ~~• amount of late payment charges~~
- ~~• revenue from standby charges~~
- ~~• revenue from low-voltage wheeling to embedded distributors~~

~~Except for the first and last items, the amounts recorded in 2004 may be used, unless otherwise noted in the application. The amount recorded in 2004 Account 4235 is unlikely to be suitable for 2006 rate design because of the update in Chapter 11.~~

~~With respect to low-voltage wheeling, a host distributor may have no record in 2004 to use for 2006 rate design. The amount used in this section might be based, instead,~~

~~upon a Tier 1 adjustment.~~

~~Revenue from connection charges based upon "time and materials" are to be included as specific service charge revenue, even though they are not Board approved, in the usual sense.~~

~~The other Board approved rates in the revenue offset are outlined in sections of this chapter.~~

10.1 Fixed/Variable Split

For each class, sub-class, or group, the rate is composed of two components:

- revenue received through the monthly service charge to the total class distribution revenue
- revenue received through the volumetric rate to the total class distribution revenue (the fixed/variable split) as determined by applying the distribution base rates to the 2004 test year statistics

~~For each class, sub-class, or group, the ratios of the above revenues will be maintained in the 2006 distribution rates process, except for new adders, such as recovery of future RSVA, future regulatory assets, and other revenue components outlined in Chapter 4.2.~~

~~The distribution base rates are the 2002 base rates shown in Sheet 2 of the 2004 RAM.~~

~~The resulting class-specific (or sub-class or group) fixed/variable split will be used to split any additional costs allocated to the rate class (or sub-class or group) from the 2006 rate process, between the fixed monthly service charge and the variable volumetric distribution rate.~~

~~The applicant must complete and file Schedule 10.1 **(to be written)**. The calculations used in the determination of the fixed/variable split for each class, sub-class, or group are also outlined in Sheet Rate Design ___ of the 2006 EDR Model, in Appendix D.~~

The recovery of new adders may be specified in Board decisions. Where not specified by the Board, the distributor will adopt the same splits as for the main class (sub-class, or group) revenue requirements.

If a distributor an applicant proposes to make any change to the effective fixed/variable split described above (e.g. to mitigate rate impacts), it must complete and file Schedule 10-1, which includes a detailed explanation and justification for the variance from the proposed methodology.

10.2 Unmetered Scattered Loads

This group of accounts includes those locations that are not specifically metered, and may include such installations as bus shelters, telephone booths, CATV amplifiers, traffic signal lights, and billboard lighting.

There is considerable variability and inconsistency among distributors in the treatment of unmetered scattered loads for rate design and billing purposes, and the levels charged to similar unmetered scattered load customers.

On an interim basis for 2006, prior to the cost allocation study and rate re-design that will take place in 2007, unmetered scattered load customers will be treated as follows:

- 1.) A distributor that currently has unmetered scattered load charges in either of the following two manners will maintain the *status quo* in its 2006 rate treatment of unmetered scattered loads:

- The monthly service charge to unmetered scattered load customers having multiple unmetered connection points is on a per customer, and not a per connection point, basis, and the level of the charge is equal to, or less than, the General Service <50 kW monthly service charge per customer.

OR

- The distributor has developed and implemented a unique level of monthly service charge(s) payable by unmetered scattered load customers.
- 2.) A distributor that currently bills its unmetered scattered load customers as small commercial or General Service <50 kW by applying the monthly service charge on a per connection point basis, shall set the level of the monthly service charge at 50% of the monthly service charge of the General Service <50 kW rate and continue to apply it on a per connection point basis.
 - 3.) From a revenue perspective, a distributor shall be kept whole as a result of any rate changes to the monthly service charge for unmetered scattered loads. Any revenue shortfall that may result from this interim measure will be recovered by means of a re-allocation of the revenue shortfall over all classes (or sub-classes or groups), in proportion to the class's (or sub-class's or group's) distribution revenue, and recovered from all the distributor's customers through both the fixed and the variable components of their respective distribution rates. The re-allocation of the revenue shortfall as a result of applying this interim measure are incorporated into the worksheet Rates 1 of the 2006 EDR Model in Appendix D.

- 4.) The methodology used by a distributor to estimate the load profiles and energy consumptions of these types of loads is not specifically incorporated into this interim solution. In the event, however, that a reasonable estimate of the energy use for a/several delivery point(s) is required, the specific customer will have reasonable advanced notice of the proposed method, and of the estimate of the cost to the customer to establish and monitor a reasonable estimate of the energy use for a delivery point or for several delivery points.

The applicant must complete and file Schedule 10-2 ~~(to be written)~~ as part of its application.

10.3 Time of Use Distribution Rates

A distributor that currently has a legacy time of use rate classification may either retain that classification, or attempt to harmonize it with the equivalent non-time of use classification, at its discretion. Such harmonization would be subject to any constraints resulting from bill impact mitigation.

If the applicant proposes to modify its legacy currently has a sub-classification entitled time of use rates, it must complete and file Schedule 10-3 ~~(to be written)~~, with a detailed explanation and justification, and a sufficient impact analysis, for the proposed change 3.

10.4 Transformer Ownership Allowance

The current levels of allowance for transformer ownership will be continued for the 2006 rates, and will be explicitly shown on the distributor's rate schedule. An applicant must complete Schedule 10-4 to provide information on this allowance. The 2006 EDR Model will include this allowance in the calculation of the appropriate rates.

10.5 Recovery of Regulatory Assets

The appropriate sections of the 2006 Handbook and the 2006 EDR Model will reflect the Board's decision(s) regarding the recovery of regulatory assets both historical and on-going, including the accumulation of new balances past December 31, 2003.

10-65 Update of Loss Adjustment Factor Reflecting ~~Distribution~~ System Losses Including Unaccounted-for Energy

A distributor's adjustment factor to reflect ~~distribution~~-system losses, including unaccounted-for energy, should reflect the current situation, to the extent practical.

2006 EDR Working Groups

Rate Base and Revenue Requirement

Executive

Colin McLorg (Chair)	Toronto Hydro
Iain Clinton	Newmarket Hydro
Brian Dingwall	Energy Probe
Susan Frank	Hydro One Networks
Julie Girvan	Consumers' Council of Canada
Gerry Guthrie	Kitchener-Wilmot Hydro
Andy Hoggarth	Peterborough Distribution Inc.
Judy Kwik / Richard Stephenson	Power Workers' Union
Cameron McKenzie	Hamilton Hydro
Jay Shepherd	Shibley Righton, on behalf of the Schools Coalition
Laurie Stickwood	Veridian Connections
Roger White	ECMI, representing a coalition of electricity distributors

Sub-groups

Test year, Forecasts and Rate Base Adjustments

Cameron McKenzie (Chair)	Hamilton Hydro
Ramona Abi-Rashed	Whitby Hydro
Randy Aiken	London Property Management Association
Lynne Anderson	Hydro Ottawa
Bruce Bacon	Elenchus Research Associates, representing Powerstream Corp.
Susan Frank	Hydro One Networks
Julie Girvan	Consumers' Council of Canada
John Sanderson	Aurora Hydro
Roger White	ECMI, representing a coalition of electricity distributors
Heather Wyatt	Brantford Hydro

Financial Parameters and Working Capital Allowance

Andy Hoggarth (Chair)	Peterborough Distribution Inc.
Ramona Abi-Rashed	Whitby Hydro
Dexter Halsall	Hamilton Hydro
Roger Higgin	Vulnerable Energy Consumers' Coalition
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Colin McLorg	Toronto Hydro
Tony Paul	Hydro One Brampton Networks
Michelle Soucie	Essex PowerLines
Dave Williamson	London Hydro

Rate Base

Iain Clinton (Chair)	Newmarket Hydro
Ramona Abi-Rashed	Whitby Hydro
Randy Aiken	London Property Management Association
Chris Amos	Waterloo North Hydro (with Kitchener-Wilmot Hydro and Cambridge & North Dumfries Hydro)
Allan Cowan	Hydro One Networks
Brian Dingwall	Energy Probe
Leslie Dugas	Bluewater Power
Giovanna Gesuale	EnWin Powerlines
Gerry Guthrie	Kitchener-Wilmot Hydro
Jan Howard	Orangeville Hydro
Cameron McKenzie	Hamilton Hydro
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Dianne Petrucci	Powerstream Corporation
Suzanne Wilson	Niagara Falls Hydro

Distribution Expenses and Transfer Pricing

Laurie Stickwood (Chair)	Veridian Connections
Chris Amos	Waterloo North Hydro (with Kitchener-Wilmot Hydro and Cambridge & North Dumfries Hydro)
Rick Groulx	ECMI, representing a coalition of electricity distributors
Cameron McKenzie	Hamilton Hydro
Ian Innis	Hydro One Networks
Judy Kwik	Power Workers' Union
Bob Mason	Consultant representing several electricity distributors
Darryl Seal	IEAI, on behalf of the Schools Coalition
Bruce Smith	RDII Utility Consulting, representing a number of electricity distributors
Suzanne Wilson	Niagara Falls Hydro
Heather Wyatt	Brantford Power

PILs and Taxes

Jay Shepherd (Chair)	Shibley Righton, on behalf of the Schools Coalition
Ramona Abi-Rashed	Whitby Hydro
Randy Aiken	London Property Management Association
Chris Amos	Waterloo North Hydro (with Kitchener-Wilmot Hydro and Cambridge & North Dumfries Hydro)
John Basilio	Hamilton Hydro
Iain Clinton	Newmarket Hydro
Laurie Cooledge	Innisfil Hydro
Mary Jo Corkum	Milton Hydro
Brian D'Amboise	St. Catharines Hydro
Richard Dimmel	Essex Power
Rick Groulx	ECMI, representing a coalition of electricity distributors
Mark Hutson	Bluewater Power
Dianne Petrucci	Powerstream Corporation
Malcolm Rowan	Canadian Manufacturers and Exporters
Alex Schiappa	Toronto Hydro
Brian Soares	Hydro One Networks
Norm Wolff	Enersource Corporation

Conservation and Demand Management

David Poch (Chair)	Green Energy Coalition
Christine Dade	Oshawa Hydro
Carmine DiRuscio	Enersource Corporation
Jack Gibbons	Pollution Probe
Jim Hall / Susan Frank	Hydro One Networks
David MacIntosh / Norm Reuben	Energy Probe
Colin McLorg	Toronto Hydro
Gary Rains	London Hydro
Malcolm Rowan	Canadian Manufacturers and Exporters
Tom Semler	Hydro One Brampton Networks
Judy Simon	Canadian Energy Efficiency Alliance
Maurice Tucci	Electricity Distributors' Association

Board Staff

Lisa Brickenden	Ontario Energy Board staff
Martin Davies	Ontario Energy Board staff
Alan Fogwill	Ontario Energy Board staff
Jennifer Lea	Ontario Energy Board staff
Keith Ritchie	Ontario Energy Board staff
John Vrantidis	Ontario Energy Board staff

Rate Design and Cost Allocation

Executive

Cameron McKenzie (Chair)	Hamilton Hydro
Lynne Anderson	Hydro Ottawa
George Armstrong	Veridian Connections
Kathy Gadsby	Bluewater Power
Bill Harper	Econalysis representing Vulnerable Energy Consumers' Coalition
Anthony Lam	Toronto Hydro
Bob Mason	Consultant representing several electricity distributors
Margaret Nanninga	Kitchener-Wilmot Hydro
Mike Roger	Hydro One Networks
Darryl Seal	IEAI, on behalf of the Schools Coalition
Marj Stewart	Innisfil Hydro
Dave Weir	Newmarket Hydro
Roger White	ECMI, representing a coalition of electricity distributors

Sub-Groups

Chapters 4 and 5 - Cost Allocation and Distribution Rate Design

Margaret Nanninga (Chair)	Kitchener-Wilmot Hydro
Ralph Amar	Enersource Hydro Mississauga
Lynne Anderson	Hydro Ottawa
Bruce Bacon	Elenchus Research Associates, representing Powerstream Corp.
Margaret Battista	Niagara Falls Hydro
Alfredo Bertolotti	Energy Probe
Dan Gapic	Hamilton Hydro
Jack Gibbons	Pollution Probe
Bill Harper	Econalysis, representing the Vulnerable Energy Consumers' Coalition
Anthony Lam	Toronto Hydro
Scott Miller	Hydro One Brampton
John McGee	Federation of Ontario Cottagers
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Terry Ridyard	Peterborough Distribution Inc.
Mike Roger	Hydro One Networks

Ken Snelson	Association of Major Power Consumers in Ontario
Kevin Vagg	Rogers Cable
Roger White	ECMI, representing a coalition of electricity distributors

Chapter 6 - Specific Service Charges and Chapter 7.1 - SSM

Dave Weir (Chair)	Newmarket Hydro
Tom Barrett	Aurora Hydro
Margaret Battista	Niagara Falls Hydro
Anthony Lam	Toronto Hydro
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Stephen Perry	Barrie Hydro
Debbie Reece	Festival Hydro
Darryl Seal	IEAI, on behalf of the Schools Coalition
Marj Stewart	Innisfil Hydro
Marie Virgoe	Peterborough Distribution Inc.

Chapter 7 – Retail Transmission, Line Losses, Low Voltage Charges, etc.

Roger White (Chair)	ECMI, representing a coalition of electricity distributors
Ralph Amar	Enersource Hydro Mississauga
Dan Gopic	Hamilton Hydro
Jack Gibbons	Pollution Probe
Anthony Lam	Toronto Hydro
Bob Mason	Consultant representing several electricity distributors
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Scott Miller	Hydro One Brampton Networks
David Poch	Green Energy Coalition
Mike Roger	Hydro One Networks
James Sidlofsky	Borden Ladner Gervais
Albert Singh	Waterloo North Hydro
Maurice Tucci	Electricity Distributors Association

Board Staff

Lee Harmer	Ontario Energy Board staff
Jennifer Lea	Ontario Energy Board staff
Neil Mather	Ontario Energy Board staff

Comparators and Cohorts

Executive

Colin McLorg (Chair)	Toronto Hydro
Carm Altomare (Vice-Chair)	Hydro One Networks
Tom Adams	Energy Probe
John Alton	PenWest Utilities
Bruce Bacon	Elenchus Research Associates, representing Powerstream Corp.
Chris Buckler	Enersource Corporation
Ron Charie	Kitchener-Wilmot Hydro
Dexter Halsall	Hamilton Hydro
Peter Henderson	Guelph Hydro
Andrew Taylor	Ogilvy Renault (representing a coalition of electricity distributors)
Maurice Tucci	Electricity Distributors' Association
Ken Walsh	London Hydro
Roger White	ECMI, representing a coalition of electricity distributors
Gaye-Donna Young	Newmarket Hydro

Working Group

Doug Fee	Ottawa River Power Corporation
Rene Gaten	Waterloo North Hydro
Ian McKenzie	RDII Utility Consulting, representing a number of electricity distributors
Alex Palimaka	Bluewater Power
Susan Reffle	Whitby Hydro
John Sanderson	Aurora Hydro
Vinay Sharma	London Hydro
Jay Shepherd	Shibley Righton, on behalf of the Schools Coalition
Ken Snelson	Association of Major Power Consumers of Ontario
Tom Wright	Thunder Bay Hydro
Heather Wyatt	Brantford Power

Board staff

Jennifer Lea	Ontario Energy Board staff
Keith Ritchie	Ontario Energy Board staff