



Board Secretary
Ontario Energy Board
2300 Yonge St.
27th Floor
Toronto ON M4P 1E4

January 26, 2012

Dear Ms. Walli,

**RE: Conservation and Demand Management (CDM) Guidelines for Electricity Distributors
(EB-2012-0003)**

Halton Hills Hydro Inc. ("HHHI") thanks the Board for the opportunity to comment on these guidelines and would like to make the following comments regarding the proposed CDM Guidelines.

HHHI is pleased to see the inclusion of Time of Use Pricing as a Board Approved program to be applied towards CDM targets as this endeavor meets the intent of CDM.

As this is a mandatory program implemented through timelines set by the Ontario Energy Board, HHHI would like clarification as to whether HHHI needs to apply for Board Approval in order to have the savings from this program count towards HHHI's targets or if all electricity distributors will be automatically included.

HHHI would also like to raise a concern over the prescriptive method suggested for calculating these targets. HHHI understands that there will be a provincial savings amount allocated to distributors; however, HHHI feels that there should be an input mechanism to provide weighting to that allocation.

HHHI was one of the first wave of utilities to implement Time of Use, taken extensive steps to educate customers on the pricing structure and has had a very high uptake in web tools provided to help customers understand and change their energy usage patterns. As such, HHHI feels that our proportion of Time of Use savings would be higher than would be allocated through the prescriptive measure described.

HHHI would like to ensure that our input will provide for an accurate reflection of our endeavours in our savings calculation.

Sincerely,

(Original signed)

Arthur A. Skidmore, CMA
President & CEO
Halton Hills Hydro Inc.