



EB-2011-0160

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

AND IN THE MATTER OF an application by Centre
Wellington Hydro Ltd. for an order or orders approving or
fixing just and reasonable distribution rates and other
charges, to be effective May 1, 2012.

BEFORE: Karen Taylor
Presiding Member

Paula Conboy
Member

DECISION AND ORDER

Introduction

Centre Wellington Hydro Ltd. ("Centre Wellington"), a licensed distributor of electricity, filed an application with the Ontario Energy Board (the "Board") on September 28, 2011 under section 78 of the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, (Schedule B), seeking approval for changes to the rates that Centre Wellington charges for electricity distribution, to be effective May 1, 2012.

By letter dated November 22, 2011, the Board determined that Centre Wellington's request for the disposition of Account 1562 - Deferred Payments in Lieu of Taxes ("PILs") is not consistent with the various decisions made in the course of the Combined PILS proceeding¹. Accordingly, the Board determined that it would not hear the application for the disposition of Account 1562 as part of this proceeding but would

¹ EB-2008-0381 Account 1562 Deferred PILs Combined Proceeding

consider it on a stand-alone basis in a separate application. The Board noted its expectation that Centre Wellington would address the disposition of Account 1562 in a stand-alone application to be filed no later than April 1, 2012.

Centre Wellington is one of 77 electricity distributors in Ontario regulated by the Board. The *Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors* (the "IR Report"), issued on July 14, 2008, establishes a three year plan term for 3rd generation incentive regulation mechanism ("IRM") (i.e., rebasing plus three years). In its October 27, 2010 letter regarding the development of a Renewed Regulatory Framework for Electricity ("RRFE"), the Board announced that it was extending the IRM plan until such time as the RRFE policy initiatives have been substantially completed. As part of the plan, Centre Wellington is one of the electricity distributors that will have its rates adjusted for 2012 on the basis of the IRM process, which provides for a mechanistic and formulaic adjustment to distribution rates and charges between cost of service applications.

To streamline the process for the approval of distribution rates and charges for distributors, the Board issued its IR Report, its *Supplemental Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors* on September 17, 2008 (the "Supplemental Report"), and its *Addendum to the Supplemental Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors* on January 28, 2009 (collectively the "Reports"). Among other things, the Reports contain the relevant guidelines for 2012 rate adjustments for distributors applying for distribution rate adjustments pursuant to the IRM process. On June 22, 2011, the Board issued an update to Chapter 3 of the Board's *Filing Requirements for Transmission and Distribution Applications* (the "Filing Requirements"), which outlines the application filing requirements for IRM applications based on the policies in the Reports.

Notice of Centre Wellington's rate application was given through newspaper publication in Centre Wellington's service area advising interested parties where the rate application could be viewed and advising how they could intervene in the proceeding or comment on the application. No letters of comment were received. The Notice of Application indicated that intervenors would be eligible for cost awards with respect to Centre Wellington's proposed incremental capital module ("ICM"), its request for lost revenue adjustment mechanism ("LRAM") recoveries and its request for the disposition of account 1562. The Vulnerable Energy Consumers Coalition ("VECC") and School Energy Coalition ("SEC") applied and were granted intervenor status in this proceeding.

The Board granted VECC and SEC eligibility for cost awards in regards to Centre Wellington's request for LRAM recoveries and ICM proposal. Board staff also participated in the proceeding. The Board proceeded by way of a written hearing.

While the Board has considered the entire record in this proceeding, it has made reference only to such evidence as is necessary to provide context to its findings. The following issues are addressed in this Decision and Order:

- Price Cap Index Adjustment;
- Rural or Remote Electricity Rate Protection Charge;
- Shared Tax Savings Adjustments;
- Retail Transmission Service Rates;
- Review and Disposition of Group 1 Deferral and Variance Account Balances;
- Review and Disposition of Account 1521: Special Purpose Charge;
- Review and Disposition of Lost Revenue Adjustment Mechanism ("LRAM") and Shared Savings Mechanism ("SSM"); and
- Incremental Capital Module ("ICM").

Price Cap Index Adjustment

As outlined in the Reports, distribution rates under the 3rd Generation IRM are to be adjusted by a price escalator, less a productivity factor (X-factor) of 0.72% and a stretch factor.

On March 13, 2012, the Board announced a price escalator of 2.0% for those distributors under IRM that have a rate year commencing May 1, 2012.

The stretch factors are assigned to distributors based on the results of two benchmarking evaluations to divide the Ontario industry into three efficiency cohorts. In its letter to Licensed Electricity Distributors dated December 1, 2011 the Board assigned Centre Wellington to efficiency cohort 3 and a cohort specific stretch factor of 0.6%.

On that basis, the resulting price cap index adjustment is 0.68%. The price cap index adjustment applies to distribution rates (fixed and variable charges) uniformly across customer classes that are not eligible for Rural or Remote Electricity Rate Protection.

The price cap index adjustment will not apply to the following components of delivery rates:

- Rate Riders;
- Rate Adders;
- Low Voltage Service Charges;
- Retail Transmission Service Rates;
- Wholesale Market Service Rate;
- Rural or Remote Rate Protection Charge;
- Standard Supply Service – Administrative Charge;
- Transformation and Primary Metering Allowances;
- Loss Factors;
- Specific Service Charges;
- MicroFIT Service Charges; and
- Retail Service Charges.

Rural or Remote Electricity Rate Protection Charge

On December 21, 2011, the Board issued a Decision with Reasons and Rate Order (EB-2011-0405) establishing the Rural or Remote Electricity Rate Protection (“RRRP”) benefit and charge for 2012. The Board amended the RRRP charge to be collected by the Independent Electricity System Operator from the current \$0.0013 per kWh to \$0.0011 per kWh effective May 1, 2012. The draft Tariff of Rates and Charges flowing from this Decision and Order will reflect the new RRRP charge.

Shared Tax Savings Adjustments

In its Supplemental Report, the Board determined that a 50/50 sharing of the impact of currently known legislated tax changes, as applied to the tax level reflected in the Board-approved base rates for a distributor, is appropriate.

The calculated annual tax reduction over the IRM plan term will be allocated to customer rate classes on the basis of the Board-approved base-year distribution revenue. These amounts will be refunded to customers each year of the plan term, over a 12-month period, through a volumetric rate rider using annualized consumption by customer class underlying the Board-approved base rates.

Centre Wellington's application identified a total tax savings credit of \$4,983 resulting in a shared amount of \$2,492 to be refunded to rate payers. Centre Wellington proposed that the amount was relatively immaterial and requested approval to record the amount in account 1595 for disposition in a future rate application.

No parties made submissions on this matter.

The Board approves shared tax savings of \$2,492 and agrees that, due to the non-material nature of the amount owing to customers, it is appropriate to record the \$2,492 credit in account 1595 for disposition in a future rate application.

Retail Transmission Service Rates

Electricity distributors are charged the Ontario Uniform Transmission Rates ("UTRs") at the wholesale level and subsequently pass these charges on to their distribution customers through the Retail Transmission Service Rates ("RTSRs"). Variance accounts are used to capture timing differences and differences in the rate that a distributor pays for wholesale transmission service compared to the retail rate that the distributor is authorized to charge when billing its customers (i.e. variance Accounts 1584 and 1586).

On June 22, 2011 the Board issued revision 3.0 of the *Guideline G-2008-0001 - Electricity Distribution Retail Transmission Service Rates* (the "RTSR Guideline"). The RTSR Guideline outlines the information that the Board requires electricity distributors to file to adjust their RTSRs for 2012. The RTSR Guideline requires electricity distributors to adjust their RTSRs based on a comparison of historical transmission costs adjusted for the new UTR levels and the revenues generated under existing RTSRs. The objective of resetting the rates is to minimize the prospective balances in Accounts 1584 and 1586. In order to assist electricity distributors in the calculation of the distributors' specific RTSRs, Board staff provided a filing module.

On December 20, 2011 the Board issued its Rate Order for Hydro One Transmission (EB-2011-0268) which adjusted the UTRs effective January 1, 2012, as shown in the following table:

2012 Uniform Transmission Rates

Network Service Rate	\$3.57 per kW
<u>Connection Service Rates</u>	
Line Connection Service Rate	\$0.80 per kW
Transformation Connection Service Rate	\$1.86 per kW

No parties made submissions on this matter.

The Board finds that the 2012 UTRs are to be incorporated into the filing module.

Review and Disposition of Group 1 Deferral and Variance Account Balances

The *Report of the Board on Electricity Distributors' Deferral and Variance Account Review Initiative* (the "EDDVAR Report") provides that, during the IRM plan term, the distributor's Group 1 account balances will be reviewed and disposed if the preset disposition threshold of \$0.001 per kWh (debit or credit) is exceeded. The onus is on the distributor to justify why any account balance in excess of the threshold should not be disposed.

Centre Wellington's 2010 actual year-end total balance for Group 1 Accounts including interest projected to April 30, 2012 is a credit of \$45,231. This amount results in a total credit claim of \$0.00029 per kWh, which does not exceed the preset disposition threshold. As a result, Centre Wellington proposed not to dispose of these accounts at this time.

Board staff noted that the filed balances reconciled to the *Reporting and Record Keeping Requirements* and agreed that no disposition was required.

The Board notes that the EDDVAR disposition threshold of \$0.001/kWh has not been exceeded. No disposition of Group 1 Accounts is required at this time.

Review and Disposition of Account 1521: Special Purpose Charge

The Board authorized Account 1521, Special Purpose Charge Assessment ("SPC") Variance Account in accordance with Section 8 of *Ontario Regulation 66/10 (Assessments for Ministry of Energy and Infrastructure Conservation and Renewable Energy Program Costs)* (the "SPC Regulation"). Accordingly, any difference between

(a) the amount remitted to the Minister of Finance for the distributor's SPC assessment and (b) the amounts recovered from customers on account of the assessment were to be recorded in "Sub-account 2010 SPC Assessment Variance" of Account 1521.

In accordance with Section 8 of the SPC Regulation, distributors are required to apply no later than April 15, 2012 for an order authorizing the disposition of any residual balance in sub-account 2010 SPC Assessment Variance. The Filing Requirements state the Board's expectation that requests for disposition of this account balance would be heard as part of the proceedings to set rates for the 2012 year.

In the Manager's Summary of its application, Centre Wellington indicated a debit balance of \$22,258.82 in Account 1521 as of December 31, 2010. Centre Wellington noted that the unaudited balance, as at June 30, 2011, in account 1521 was a debit of \$2,335.26.

In response to Board staff interrogatory #2, Centre Wellington provided a table identifying the principal balance of Account 1521 as of December 31, 2010, including the amount recovered from customers in 2011, plus projected carrying charges as of April 30, 12. This total balance is a debit of \$2,357.13.

Board staff submitted that despite the usual practice, the Board should authorize the disposition of Account 1521 as of December 31, 2010, including carrying charges, plus the amount recovered from customers in 2011, including carrying charges, because the account balance does not require a prudence review, and electricity distributors are required by regulation to apply for disposition of this account. Board staff suggested that the Board direct Centre Wellington to record the balance in account 1595 for future disposition due to the immaterial nature of the amount.

In its reply submission, Centre Wellington agreed with Board staff that Account 1521 should be disposed as of December 31, 2010, plus the amount recovered from customers in 2011, including projected carrying charges to April 30, 2012 for a total debit balance of \$2,357.13 to be recorded in account 1595 for future recovery.

The Board will approve, on a final basis, the recovery of a debit balance of \$2,357.13, representing principal as at December 31, 2010, plus recoveries from customers in 2011, plus interest to April 30, 2012. The Board directs Centre Wellington to record the SPC debit balance in variance account 1595 for future disposition. The Board directs

Centre Wellington to close account 1521 effective May 1, 2012.

For accounting and reporting purposes, the balance of Account 1521 shall be transferred to the applicable principal and interest carrying charge sub-accounts of Account 1595 pursuant to the requirements specified in Article 220, Account Descriptions, of the *Accounting Procedures Handbook for Electricity Distributors*. The date of the journal entry to transfer the approved account balances to the sub-accounts of Account 1595 is the date on which disposition of the balances is effective in rates, which generally is the start of the rate year (e.g. May 1). This entry should be completed on a timely basis to ensure that these adjustments are included in the June 30, 2012 (3rd Quarter) RRR data reported.

Review and Disposition of Lost Revenue Adjustment Mechanism (“LRAM”) and Shared Savings Mechanism (“SSM”)

The Board’s *Guidelines for Electricity Distributor Conservation and Demand Management* (the “CDM Guidelines”) issued on March 28, 2008 outline the information that is required when filing an application for LRAM or SSM.

Centre Wellington requested the recovery of an LRAM claim of \$103,372.33. In response to interrogatories from Board staff and intervenors, Centre Wellington updated its LRAM claim to \$106,968.67 to reflect the Ontario Power Authority’s (“OPA”) 2010 final results. Centre Wellington’s LRAM claim consists of the effect of 2009 and 2010 CDM programs in 2009 and 2010, the effects of 2005-2008 programs from 2006-2008, the persisting effects of 2005-2008 programs in 2009 and 2010 and the persisting impacts of 2005-2010 programs in 2011. Centre Wellington also requested the recovery of an SSM claim of \$1,509.52. Centre Wellington proposed to recover the LRAM and SSM claims over a one-year period.

Board staff noted that Centre Wellington last rebased in 2009. Board staff submitted that it does not support the recovery of persisting lost revenues from 2005 to 2008 CDM programs in 2009 and 2010 or the lost revenues from 2005-2009 programs in 2011 as these amounts should have been incorporated in Centre Wellington’s last load forecast. Board staff supported the recovery of lost revenues from 2005-2008 programs in 2006 to 2008 as those lost revenues took place during IRM years and Centre Wellington did not previously recover those amounts. Board staff supported recovery of the lost revenues from 2010 programs in 2010. Board staff submitted that it was premature to

consider any lost revenues from CDM programs persisting into 2011.

At Board staff's request, Centre Wellington provided an updated LRAM claim of \$49,850.61 reflecting Board staff's position. Board staff supported the approval of the requested SSM amount of \$1,509.52 as it is generally consistent with the Board's Guidelines.

VECC submitted that the LRAM claim approved by the Board should be adjusted to exclude the proposed lost revenue in 2009 and beyond for CDM programs implemented between 2005 and 2009, as well as the proposed lost revenue for 2010 CDM programs in 2011.

Centre Wellington submitted that there was no reliable predictive variable for CDM in the Board approved 2009 load forecast. On that basis, Centre Wellington submitted that persistence of 2006-2009 CDM program results in 2010 should be included in the final LRAM claim. In its reply submission, Centre Wellington re-iterated its request for recovery of an LRAM claim of \$106,968.67.

The Board will approve an LRAM claim of \$49,850.61, representing lost revenues for programs delivered from 2005 to 2008 in those years and 2010 programs implemented in 2010, as Centre Wellington was under IRM during this period and has not otherwise been compensated for lost revenues from these programs. These recoveries are consistent with the CDM Guidelines. The Board will not approve LRAM arising from the persistence of 2010 programs in 2011, as it is premature to do so and inconsistent with the CDM Guidelines. The Board will not approve an LRAM claim relating to the recovery of persisting lost revenues from 2005 to 2008 programs in 2009 and 2010, as these amounts should have been incorporated into the 2009 load forecast, consistent with the CDM Guidelines. The Board's Decision and Order in Centre Wellington's 2009 cost of service application (EB-2008-0225) is not determinative, as it is silent on the issue. As such, there is no reasonable basis to vary from the CDM Guidelines. The Board will not approve LRAM relating to the recovery of persisting lost revenues from 2005 to 2009 in 2011, as these amounts should have been incorporated into the 2009 load forecast.

The Board approves recovery of an SSM amount of \$1,509.52 as Centre Wellington's application for SSM recovery is consistent with the Board's CDM Guidelines.

Incremental Capital Module (“ICM”)

The Request

Centre Wellington proposed to recover, through an ICM, the incremental capital costs associated with a \$1.2 million capital contribution to rehabilitate its Fergus MS-2 municipal transformer station and \$164,000 to install a fully functional SCADA system. In the application, Centre Wellington stated that its current non-discretionary capital budget for 2012 (excluding the proposed ICM projects) was \$815,600.

The Eligibility Criteria

The Reports referenced in the introduction of this Decision and Order require that incremental capital expenditures satisfy the eligibility criteria of materiality, need and prudence in order to be considered for recovery prior to rebasing. Applicants must demonstrate that the amounts exceed the Board’s materiality threshold and clearly have a significant influence on the operation of the distributor, must be clearly non-discretionary and the amounts must be outside the base upon which rates were derived. In addition, the decision to incur the amounts must represent the most cost-effective option for ratepayers.

(i) Materiality

Centre Wellington calculated a materiality threshold value of \$851,349 and calculated the maximum eligible capital to be \$1,326,951 (\$2,178,300 in total non-discretionary capital budget, including the proposed ICM projects, minus the materiality threshold of \$851,349).

Both Board staff and VECC submitted that the Board-defined materiality threshold has been exceeded.

In response to SEC interrogatory #2, Centre Wellington stated that the proposed SCADA project meets the Board’s requirements for an ICM because it “brings the total capital requirement over the Incremental Capital threshold.” SEC submitted that based on this statement, if the Board were to deny Centre Wellington’s recovery of the SCADA project in the ICM, it should also deny recovery of the Fergus MS-2 substation project as it does not meet the materiality threshold on its own.

The Board agrees with both VECC and Board staff that Centre Wellington's proposed incremental capital projects meet the materiality threshold.

(ii) Need and Prudence

Centre Wellington retained the services of Costello Associates Inc. to provide an asset condition assessment of six of its distribution stations and to determine the feasibility of a new SCADA system. In its report, Costello Associates Inc. identified serious potential issues related to safety, reliability, environmental protection and age. Costello Associates Inc. recommended that Centre Wellington begin work immediately to address the major concerns identified in the report.

In order to begin work immediately, Centre Wellington proposed to recover the costs for two projects identified by Costello Associates Inc., the rehabilitation of the Fergus MS-2 municipal substation and the installation of a new SCADA system, through the proposed ICM. In response to interrogatories, Centre Wellington stated that it was seeking recovery for these capital projects immediately to minimize Centre Wellington's exposure to public safety and reliability risk. Additionally, Centre Wellington stated that it believed that the phasing in of the replacement and rehabilitation of the distribution station components during the IRM period would aid to smooth the rate shock for customers as opposed to waiting until its next cost of service application.

In response to interrogatories, Centre Wellington noted that several designs were considered for the proposed work including a complete replacement of the Fergus MS-2 substation before Centre Wellington settled on the work proposed in the Application. Centre Wellington also noted that it planned to request competitive bids for the completion of the rehabilitation work at the Fergus MS-2 substation.

In response to interrogatories from Board staff, VECC and SEC as to why Centre Wellington believed that the proposed SCADA system met the eligibility criteria for an ICM, it stated that completion of the SCADA project would allow for full SCADA integration as the planned station upgrades and rebuilds are completed over the next five years. Centre Wellington stated that the SCADA project would allow for additional monitoring and control of its electrical system while facilitating incorporation of future distributed generation projects. Centre Wellington also noted that its current remote metering system was experiencing hardware failures and that the installation of the

SCADA system at this time would assist in avoiding unnecessary expenditures to keep the existing system operational.

Board staff and VECC submitted that the Fergus MS-2 sub-station rehabilitation has met the need and prudence criteria and should be eligible for recovery through the ICM. Board staff, SEC and VECC submitted that the proposed SCADA system was not a non-discretionary expense and should not be included for recovery through the ICM. Board staff noted that it believed the majority of the benefits of the proposed SCADA system would only be achieved once the rehabilitation of the remaining substations, identified in the Costello Associates Inc. report, is completed.

SEC submitted that identifying expenditures as non-discretionary should not be enough for an applicant to request an ICM. SEC noted its belief that in the normal course a distributor should be monitoring and replacing or refurbishing its substations and that the requirement for the proposed Fergus MS-2 sub-station rehabilitation did not fall outside of the scope upon which rates were derived.

With respect to the proposal for the Fergus MS-2 substation, the Board is of the view that the need and prudence for the rehabilitation of the substation has been demonstrated by the Costello Associates Inc. asset condition report. It is also clear that this work is not discretionary nor is it otherwise reflected in Centre Wellington's 2011 capital budget.

The Board will not approve the SCADA project, as it is not clear that the project is non-discretionary. Moreover, the Board agrees with the submission of staff that the majority of the benefits of the proposed SCADA system will only be achieved once the remaining substations are rehabilitated.

Incremental Revenue Requirement Calculation and Recovery

Centre Wellington applied the half-year rule when calculating the incremental revenue requirement associated with the allowable ICM amount as Centre Wellington is in its final IRM year.

Through interrogatories, Board staff and VECC identified inconsistencies in the input parameters used by Centre Wellington in the incremental revenue requirement calculation. Centre Wellington confirmed that it had used the incorrect capital structure

and incorrect cost of capital parameters from its 2009 cost of service application among other inconsistencies. In response to interrogatories, Centre Wellington provided corrected evidence supporting its incremental revenue requirement calculation and provided an updated calculation of its revenue requirement.

Centre Wellington proposed to allocate the revenue requirement associated with the incremental capital expenditures eligible for cost recovery on the basis of distribution revenue. Centre Wellington proposed to recover these amounts by means of variable rate riders that would be in place until such time that Centre Wellington files its next rebasing application, currently scheduled for 2013 rates. Centre Wellington stated that it believed variable rate riders were more appropriate as they more accurately reflect use of the electricity system and associated assets.

Board staff submitted that the half-year rule was correctly applied by Centre Wellington. Board staff submitted that the updated revenue requirement calculation provided by Centre Wellington is consistent with the Filing Requirements. Board staff also submitted that Centre Wellington's proposed method for recovery is reasonable. VECC and SEC made no specific submissions on this matter.

The Board directs Centre Wellington to recalculate the incremental revenue requirement reflecting only the \$1.199 million for the cost of the Fergus MS-2 substation and reflecting 60/40 debt/equity, the remaining cost of capital parameters from Centre Wellington's 2009 cost of service application, and incorporating the correct data identified through interrogatories, as well as Centre Wellington's most recent stretch factor ranking (0.6%), in the ICM model. The Board approves the resulting rate riders for a one year period, from May 1, 2012 to April 30, 2013.

The Board is of the view that as 2013 is a rebasing year for Centre Wellington, the half year rule will apply.

The Board approves a variable rate rider to recover the incremental revenue requirement associated with the ICM, consistent with previous ICM decisions and consistent with how the distribution system is used. The incremental revenue requirement will be allocated on the basis of distribution revenue.

IMPLEMENTATION

The Board has made findings in this Decision which change the 2012 distribution rates from those proposed by Centre Wellington.

The Board expects Centre Wellington to file a draft Rate Order, including all relevant calculations showing the impact of this Decision on Centre Wellington's determination of the final rates. Supporting documentation shall include, but not be limited to, filing completed versions of the 2012 IRM Rate Generator model and updated ICM work form and work sheet models.

A Rate Order will be issued after the steps set out below are completed.

THE BOARD ORDERS THAT:

1. Centre Wellington shall file with the Board, and shall also forward to intervenors, a draft Rate Order that includes revised models in Microsoft Excel format and a proposed Tariff of Rates and Charges reflecting the Board's findings in this Decision by March 29, 2012.
2. Board staff and intervenors shall file any comments on the draft Rate Order including the revised models and proposed rates with the Board and forward to Centre Wellington within 7 days of the date of filing of the draft Rate Order.
3. Centre Wellington shall file with the Board and forward to intervenors responses to any comments on its draft Rate Order including the revised models and proposed rates within 4 days of the date of receipt of Board staff or intervenor comments.

Cost Awards

The Board will issue a separate decision on cost awards once the following steps are completed:

1. VECC and SEC shall submit their cost claims no later than **7 days** from the date of issuance of the final Rate Order.

2. Centre Wellington shall file with the Board and forward to VECC and SEC any objections to the claimed costs within **21 days** from the date of issuance of the final Rate Order.
3. VECC and SEC shall file with the Board and forward to Centre Wellington any responses to any objections for cost claims within **28 days** from the date of issuance of the final Rate Order.
4. Centre Wellington shall pay the Board's costs incidental to this proceeding upon receipt of the Board's invoice.

All filings to the Board must quote file number **EB-2011-0160**, be made through the Board's web portal at, www.errr.ontarioenergyboard.ca and consist of two paper copies and one electronic copy in searchable / unrestricted PDF format. Filings must clearly state the sender's name, postal address and telephone number, fax number and e-mail address. Parties must use the document naming conventions and document submission standards outlined in the RESS Document Guideline found at www.ontarioenergyboard.ca. If the web portal is not available parties may email their document to the address below. Those who do not have internet access are required to submit all filings on a CD in PDF format, along with two paper copies. Those who do not have computer access are required to file 2 paper copies.

DATED at Toronto, March 22, 2012
ONTARIO ENERGY BOARD

Original signed by

Kirsten Walli
Board Secretary