



December 12, 2012

**BY EMAIL/COURIER/RESS**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON  
M4P 1E4

Dear Ms. Walli,

**RE: Whitby Hydro Electric Corporation  
Application for 2013 Electricity Distribution Rates (EB- 2012-0177)  
Draft Tariff of Rates and Charges**

Whitby Hydro Electric Corporation (“Whitby Hydro”) provides this submission regarding the Draft Tariff of Rates and Charges issued with the Ontario Energy Board’s (the “Board”) Decision on December 6, 2012. Upon review of the Board’s decision, Whitby Hydro has noted the following two items:

1. Tariff of Rates and Charges (General Service 50 – 4,999 kW service classification)

Whitby Hydro advises the Board that the following section from the first paragraph (which describes the service classification) is not applicable and should be removed:

*Note that for the application of the Retail Transmission Rate – Network Service Rate and the Retail Transmission Rate – Line and Transformation Connection Service Rate the following sub-classifications apply:*

*General Service 50 to 4,999 kW non-interval metered  
General Service 50 to 4,999 kW interval metered*

This distinction of sub-classifications was removed as part of a previous application (2010 cost of service) as it is no longer required. Removing this section would provide clarity and consistency with Whitby Hydro’s 2012 tariff sheet.

2. Tariff of Rates and Charges (General Service 50 – 4,999 kW service classification)

Based on discussions with board staff, Whitby Hydro was advised that the Standard Supply Service (SSS) – Administrative Charge would not apply to an embedded wholesale market participant (EWMP). Whitby Hydro is concerned that the proposed wording included in paragraph three of the “Application” section of the tariff sheet does not fully address the Board regulated charges that are not applicable to an EWMP. In addition, the wording is not consistent with that used in the other service

classifications. As a result, Whitby Hydro requests a modification to the following section from paragraph four:

*It should be noted that the Wholesale Market Service Rate, the Rural Rate Protection Charge and the Debt Retirement Charge do not apply to customers who are embedded wholesale market participants.*

To ensure clarity and consistency, Whitby Hydro recommends that the wording of this section be the same as that used in the other service classifications. If the Board wishes to specifically address the applicability of the Debt Retirement Charge, this can also be further incorporated. An example of revised wording might be:

*In addition, the charges in the MONTHLY RATES AND CHARGES – Regulatory Component of this schedule do not apply to a customer that is an embedded wholesale market participant. Furthermore, the Debt Retirement Charge is not an applicable charge for electricity distributors to apply to a customer that is an embedded wholesale market participant.*

Whitby Hydro is open to other alternate wording which would address the concerns raised.

Two paper copies of this letter will follow via courier. A copy has also been filed electronically through the Board's RESS system.

If there is any further information required by the Board regarding this submission, please feel free to contact me directly.

Respectfully submitted,

*Original Signed By*

Ramona Abi-Rashed  
Treasurer

cc: Mr. Michael Janigan (email)  
Ms. Shelley Grice (email)  
Ms. Georgette Vlahos (email)