



August 15, 2013

Board Secretary  
Ontario Energy Board  
27th Floor/ P.O. Box 2319  
2300 Yonge St.  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Re: EB-2013-0273 Consultation on Proposed Revisions to Regulated Price Plan Manual: Changes to the Calculation of the Final Variance Settlement Amount for Consumers that Leave the Regulated Price Plan**

Halton Hills Hydro Inc. ("HHHI") thanks the Board for the opportunity to comment on the proposed revisions to the calculation of the Final Variance Settlement Amount ("FVSA") for consumers leaving the Regulated Price Plan ("RPP") as currently included in the Regulated Price Plan Manual.

HHHI currently uses an automated program to calculate the RPP FVSA, based on a twelve (12) month historical consumption. Any changes to the calculation will result in either programming changes or manual interventions, both at additional cost to HHHI.

HHHI is not aware of any consumers in our territory opting in and out of RPP and thus, additional programming and staff costs would be incurred without a benefit to HHHI consumers. Additionally, HHHI would require four (4) months to implement any programming and/or process changes.

HHHI recommends allowing consumers to opt in and out of RPP only once per twelve (12) consecutive months. This limit on occurrences would ensure that consumers only receive the RPP FVSA once in any twelve (12) month period and would represent the original intent of the RPP FVSA. The RPP FVSA would still be calculated on twelve (12) months historical consumption.

Should the Board not wish to limit the number of occurrences in which a consumer can opt in and out of RPP, HHHI would suggest continuing with the current RPP FVSA calculation but limiting the credit/debit to once per consecutive twelve (12) month period.

HHHI looks forward to continued discussion related to the RPP FVSA.

Any additional questions or clarifications can be directed towards Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, Halton Hills Hydro Inc., (519) 853-3700 extension 257, [tracyr@haltonhillshydro.com](mailto:tracyr@haltonhillshydro.com).

Yours truly,

*(Original signed)*

Tracy Rehberg-Rawlingson  
Regulatory Affairs Officer  
Halton Hills Hydro Inc.

Cc: Arthur A. Skidmore, President & CEO  
David J. Smelsky, CFO