



February 17, 2015

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

Dear Ms. Walli:

**RE: PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE – EB-2014-0198  
COMMENTS FROM ALGOMA POWER INC.**

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On February 5, 2015, the Ontario Energy Board (the "Board") gave notice under section 70.2 of the Ontario Energy Board Act, 1998 of proposed amendments to the Distribution System Code (the "DSC") in relation to billing frequency, the use of estimated billing, and billing accuracy. The Board's Notice invited interested parties to submit written comments on the proposed amendments to the DSC by February 19, 2015. These are the comments of Algoma Power Inc. ("API"). These comments are limited to the particular circumstance of API in relation to the proposed amendments.

#### **BACKGROUND**

In API's Distribution Licence, ED-2009-0072, the following code exemption is identified:

The Licensee is exempt from the provisions of the Standard Supply Service Code for Electricity Distributors requiring time-of-use pricing for Regulated Price Plan consumers with eligible time-of-use meters, as of the mandatory date for the identified customers hard to reach customers in EB-2013-0056.

This exemption expires July 1, 2015.

As described in EB-2013-0056, API is unable to collect interval data from smart meters in extremely remote areas and is unable to manually read these meters due to accessibility issues during the winter months. As well, as described in EB-2013-0056, there are approximately 125 customer services in remote locations where the main breaker or disconnect switch is located on the line side of the meter. During the off-season the customer will open this disconnect and effectively shut down

communications with the smart meter. Consequently, API is unable to obtain actual meter reads for these customers and must therefore rely on estimations to permit monthly billing.

#### **BILLING FREQUENCY AND ESTIMATED BILLING**

API bills its Residential – R1 customers, which is a mix of the generic Residential and General Service less than 50 kW customer classes, on a monthly basis. Normally and for the majority of these customers the bill is calculated using actual meter reads.

However, for the reasons described in EB-2013-0056 and discussed here, there are both hard to reach and non-communicating smart meters that cannot be accessed for certain times of the year. For these excepted customers API must rely on estimated readings in order to bill monthly.

API does offer its customers an equalized monthly billing plan and as well an e-billing solution.

API only uses estimated readings on an exceptional basis and customer disconnects are not based on an estimated bill.

#### **BILLING ACCURACY**

API has no comments related to the Board's proposal to include billing the accuracy measure in the DSC with the target level for the performance measure.

#### **COMING INTO FORCE**

The Board has proposed that the proposed amendments regarding estimated billing and billing accuracy come into force on the date they are published on the Board's website after having been made by the Board and that the proposed amendment regarding monthly billing (proposed section 2.6.1A) will come into force on December 31, 2016.

Upon receipt of final notice by API that the amendment regarding monthly billing (section 2.6.1A) will come into force, API will make an application to the Board for an exemption to section 2.6.1A of the DSC unless otherwise acknowledged by the Board.

Yours truly,

*Original Signed By:*  
Douglas R. Bradbury  
Director, Regulatory Affairs