

February 2, 2009

Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St. 27th Floor
Toronto, Ontario, M4P1E4

Re: Brantford 2009 IRM Application (EB-2008-0162) – Brant County Power Submission

Brant County Power's (BCP) objection to the Brantford Power's (BP) 2009 IRM application is with respect to the level of cost currently included in the starting rates contained within the IRM model, approved as part of the 2008 Cost of Service Application (EB-2007-0698).

Commencing May 1, 2008, BP began charging BCP its new rates on an interim basis pursuant to the OEB's order. This new interim rate was subsequently approved on August 29, 2008. Prior to the implementation of these rates, BCP was not paying for this service and as a result an increase of several hundreds of thousands of dollars of expenses are now being transferred to BCP customers, when, nothing has changed from the physical supply channel.

BP is entitled to its reasonable costs but the costs being charged to BCP are unconscionably high given the service provided.

Historical Information

As indicated in the intervention application, BCP has previously filed a compliance complaint with respect to the application of rates. The Compliance Officer has indicated that this is a rates issue and not a compliance issue. Please note, the original compliance letter (Appendix A) and the OEB response (Appendix B) have been included in this submission.

Along with the correspondence attached, BCP has had various discussions with various departments of the OEB and different levels of Board Staff. It was suggested to file an intervention in the 2009 IRM application of BP (this letter) and file a motion to rehear the 2008 application (EB-2007-0698). The merits of the motion to rehear will be contained in the motion itself; however, the main source of contention is the fact that appropriate and necessary notice of the 2008 application was not given to BCP as per Procedural Order 1 attached to this application as Appendix C. Therefore, BCP did not have the opportunity to consider and comment at that time.

The basis of the complaint is due to the level of charges currently being applied to BCP as an "Embedded Distributor". As discussed in the original compliance application BCP does not fit the definition of an "Embedded Distributor", but does receive service from BP. BCP's view is that this is "Wheeling" service and submits that the rate should be more in line with precedence setting decisions similar to that of EB-2007-0900 – Cambridge and North Dumphries Hydro Inc. that approves, on an interim basis, two separate "Distribution Wheeling" charges.

Customer Impact

The following chart compares actual June 2008 charges levied by BP to a wheeling charge estimated at \$0.60 per kW.

<u>Meter Point</u>	<u>Demand</u>	<u>Actual June Charges</u>	<u>LV Rate*</u>	<u>Charges for Comparison</u>	<u>Difference</u>
Colbourne West	3,608	\$ 12,127.58	\$ 0.60	\$ 2,164.80	\$ 9,962.78
Colbourne	8,570	\$ 28,368.24	\$ 0.60	\$ 5,142.00	\$ 23,226.24
Powerline	1,857	\$ 13,642.58	\$ 0.60	\$ 1,114.20	\$ 12,528.38
Total (June 2008)		\$ 54,138.40		\$ 8,421.00	\$ 45,717.40

* - BCP is using the current LV Wheeling rate as a proxy for comparison purposes only

The above chart indicates that in June 2008 BCP is being overcharged by approximately 85%.

If we assume the annual charges of the current rate amount to a range of \$500,000 to \$650,000 ($12 * \$54,138.40 = \$650,000$), the annual overbilled amount would represent \$425,000 to \$552,500.

The current accounting treatment utilized by BCP is to track these costs as expenses and to transfer the increased costs to a variance account. Assuming a 4 year regulatory cycle, the over billing accumulated in variance accounts is estimated at \$1,700,000 to \$2,210,000. Assuming a 4-year recovery period, the annual incremental regulatory asset recovery is between \$425,000 and \$552,500.

Comparing this to the 2006 Distribution Revenue of BCP (\$5.7 million) we see an annual impact up to 9.7%. This increase excludes all other impacts (smart meters, K-Factor and other rebasing activities) that will accompany a Cost of Service rate application. BCP does not have access to actual costing and can not accurately estimate the appropriate cost based rate and therefore have used the \$0.60 per kW for illustrative purposes only. Please note, in neighboring jurisdictions the OEB Board has considered Distribution Wheeling charges that have been approved as low as \$0.08 per kW (EB-2007-0900).

BCP is concerned about the effect this increase will have upon its Cost of Service application. The increased costs will force BCP to consider rate mitigation in order to minimize the net impact to ratepayers.

Along with this variance account impact, BCP customers would also be responsible for an increased return value for BCP, resulting from a higher working capital portion of Rate Base. This value is not material and represents less than a 1% impact, however is worth noting.

BCP submits that this level of impact is not acceptable to its end use rate payers without a proper cost study.

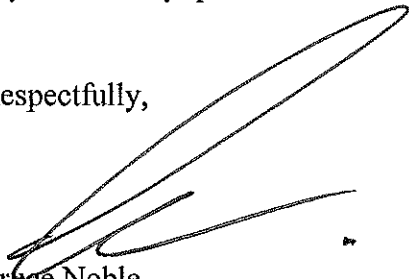
Solution

It is BCP's submission that BP be ordered to forthwith develop a cost based proposal for a distribution wheeling charge, as utilized in EB-2007-0900. If the OEB decides to proceed with the above recommendation, BCP requests an accounting order to approve the tracking of these costs in a variance account.

Forcing BCP customers to incur the level of cost identified above over the next 4 years without a full costing study is not a fair practice and results in both unjust and unreasonable rates.

If you have any questions or concerns, please contact me directly.

Respectfully,



Bruce Noble
Chief Executive Officer
Email: bnoble@brantcountypower.com
Ph: 519-442-2215

Appendix A

Brant County compliance application – Nov. 14, 2008

November 14, 2008

Brian Hewson
Compliance Office
Ontario Energy Board
PO Box 2319
2300 Yonge St. 27th Floor
Toronto, Ontario, M4P1E4

**Re: Application of Brantford Power Inc. 2008 Tariff of Rates and Charges effective
Sept. 1, 2008 (and interim rate order dated May 1, 2008) – EB-2007-0698**

Overview:

Commencing May 1, 2008, using an interim rate order and officially approved effective September 1, 2008, Brantford Power Inc. (BPI) began charging Brant County Power (BCP) distribution charges, using a General Service > 50 kW rate, on three feeder lines:

1. 1000009670 - Colbourne St. West
 - a. Distribution (fixed & variable)
 - b. Regulatory Asset Recovery
2. 1000006030 - Powerline Rd. MS2
 - a. Distribution (fixed & variable)
 - b. Regulatory Asset Recovery
 - c. Retail Transmission (Connection and Transmission)
3. 1000001320 - Colbourne St.
 - a. Distribution (fixed & variable)
 - b. Regulatory Asset Recovery

In the decision provided by the OEB, the General Service > 50 kW rate was granted temporary approval to be charged for both embedded distribution customers (in lieu of a specific embedded cost based rate) and for the large use class (in lieu of a specific large use cost based rate). The OEB stated in the decision, that this practice is not ideal, however, is also not unique and was approved until the time in which BPI applies for specific larger use classes (next rebasing). Charges to BCP on the three feeder lines identified above are estimated annually between \$500,000 \$650,000.

Compliance Issue:

While BCP does not agree with the current rates being charged to the three feeder lines identified above, a broader issue is the fact that BCP is not a distribution customer of BPI, neither as a General Service Customer nor as an Embedded Customer.

A review of physical connections (Appendix A), IESO totalization tables (Appendix B), Distribution System Code, BPI's Conditions of Service and June 2008 BPI invoices (appendix C) all lead to the conclusion that BCP is a Wholesale Market Participant (WMP) and not an Embedded Distributor, using the OEB's and BPI's definition.

The definition of an embedded distributor, pulled from the DSC is as follows (page 3 of DSC):

"embedded distributor" means a distributor who is not a wholesale market participant and that is provided electricity by a host distributor;

The Brantford Power Inc. Conditions of Service document filed as part of the 2008 Rate Proceeding (EB-2007-0698) section 3.7.3 – Billing states;

"Brantford Power Inc. shall settle non-competitive electricity services based on the rates approved by the Ontario Energy Board and by the requirements of the Retail Settlement Code."

As Wholesale Market, Retail Transmission (with the exception of Powerline Rd. MS2), RRA, DRC and Commodity are settled with the IESO or Hydro One directly and not by BPI, BCP submits that we are not considered an Embedded Distributor following BPI definitions and guidelines.

To follow the definition from the DSC above, if we review the BCP IESO Totalization Tables (appendix B) we see that the points in question are all contained as additives on the tables, and are therefore wholesale points metered directly by the IESO. Please see appendix A.

It is BCP's submission that the current rate approved for BPI, Embedded Distributor (General Service > 50 kW) should not be applied as BCP is not an Embedded Distributor.

If the OEB agrees that BCP is not a distribution customer of BPI; the regulatory asset recovery should also not apply. As BCP is and has always been a WMP, any charges relating to variances for WMS, Retail Transmission and other non-competitive charges have been settled via the IESO. Since BCP has not accumulated any of these charges, BCP should not be responsible for the recovery of these variances.

Solution:

While BCP understands that they are using a portion of the BPI distribution system, the usage is actually wheeling usage as compared to distribution usage.

BPI is not responsible for settling Commodity, WMS, RRA, DRC or RTR charges. BPI does not provide any retail metering services nor carrying charges relating to non-competitive charges. As a result the application of distribution charges are inappropriate and in excess of the actual cost of the distribution system usage and BPI employees time.

If BPI applied to the OEB for a cost based wheeling charge, BCP would be fully supportive of the request and approval of the cost based charge.

Recently a decision with respect to Low Voltage Wheeling charges was approved for Cambridge and North Dumfries Hydro (EB-2007-0900). The rates approved are summarized below:

- For application to Waterloo North - \$0.59 per kW per month
- For application to Hydro One Networks - \$0.55 per kW per month

Impact to Customers:

The following chart compares actual June 2008 charges levied by BPI to a wheeling charge estimated at (using EB-2007-0900 results for quantitative purposes) \$0.60 per kW.

<u>Meter Point</u>	<u>Demand</u>	<u>Actual June Charges</u>	<u>Estimated LV Rate</u>	<u>Proposed Charges</u>	<u>Difference</u>
Colbourne West	3,608	\$ 12,127.58	\$ 0.60	\$ 2,164.80	\$ 9,962.78
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Total (June 2008)		\$ 54,138.40		\$ 8,421.00	\$ 45,717.40

The above chart indicates that in June 2008 BCP is being overcharged by approximately 85% using distribution charges and the EB-2007-0900 results.

If we assume the annual charges of the current rate amount to a range of \$500,000 to \$650,000, the annual overbilled amount would represent \$425,000 to \$552,500.

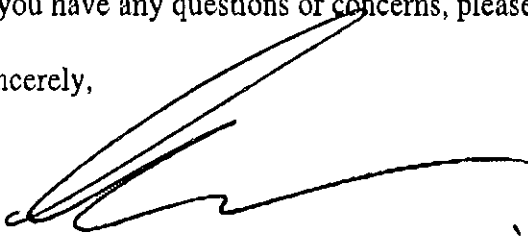
There are two separate accounting options for these charges. If we assume that the current charges from BPI are normal distribution expenses, then BCP and its shareholders are responsible for the incremental billings. If the assumption is made that these charges are LV related and should be placed into a variance account (i.e. 1550) then the utility is kept whole, however, ratepayers will be responsible for these charges upon disposition of variance accounts. Either method causes undue financial stress to the BCP community.

Requested Outcome:

It is BCP submission that effective immediately BPI be directed to cease billing BCP the distribution charges identified and rebate all charges levied upon the three lines in question.

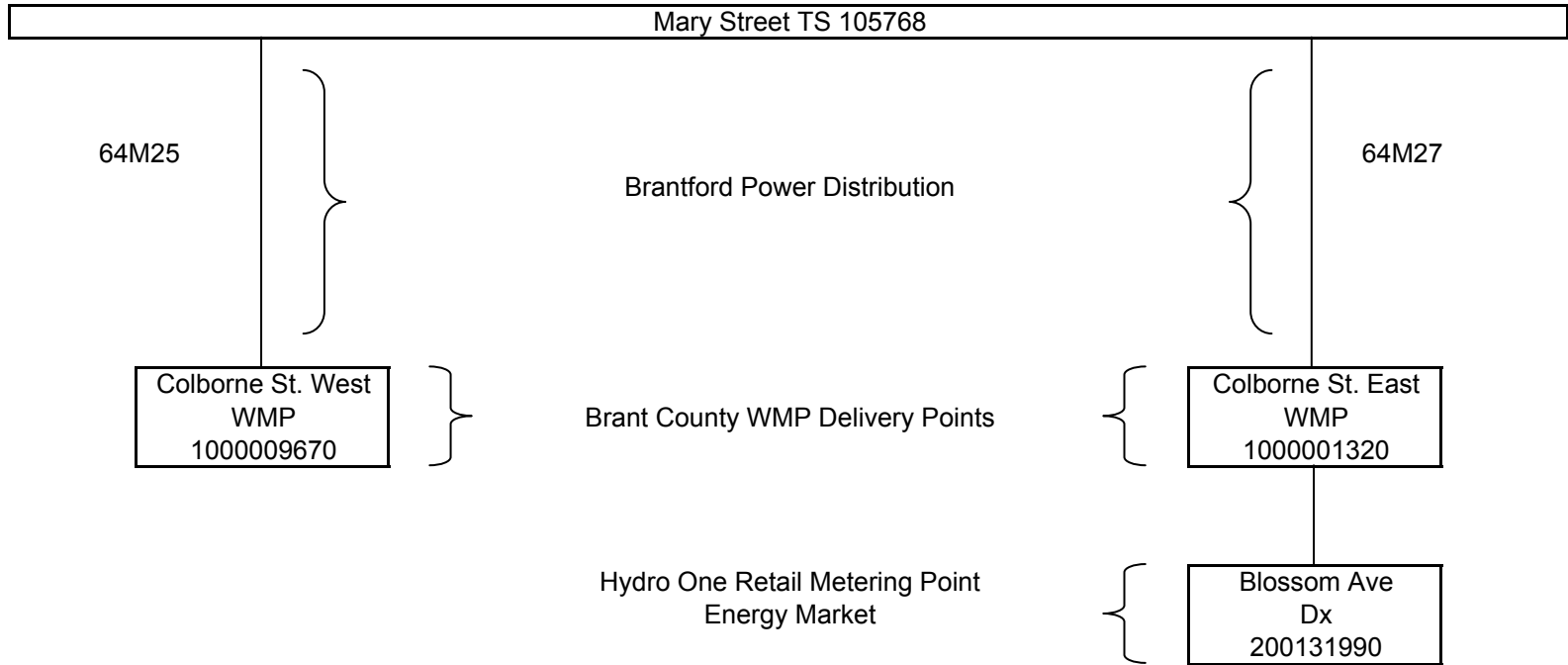
If you have any questions or concerns, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Noble', with a long horizontal stroke extending to the right.

Bruce Noble
Chief Executive Officer
Email: bnoble@brantcounrypwr.com
Ph: 519-442-2215

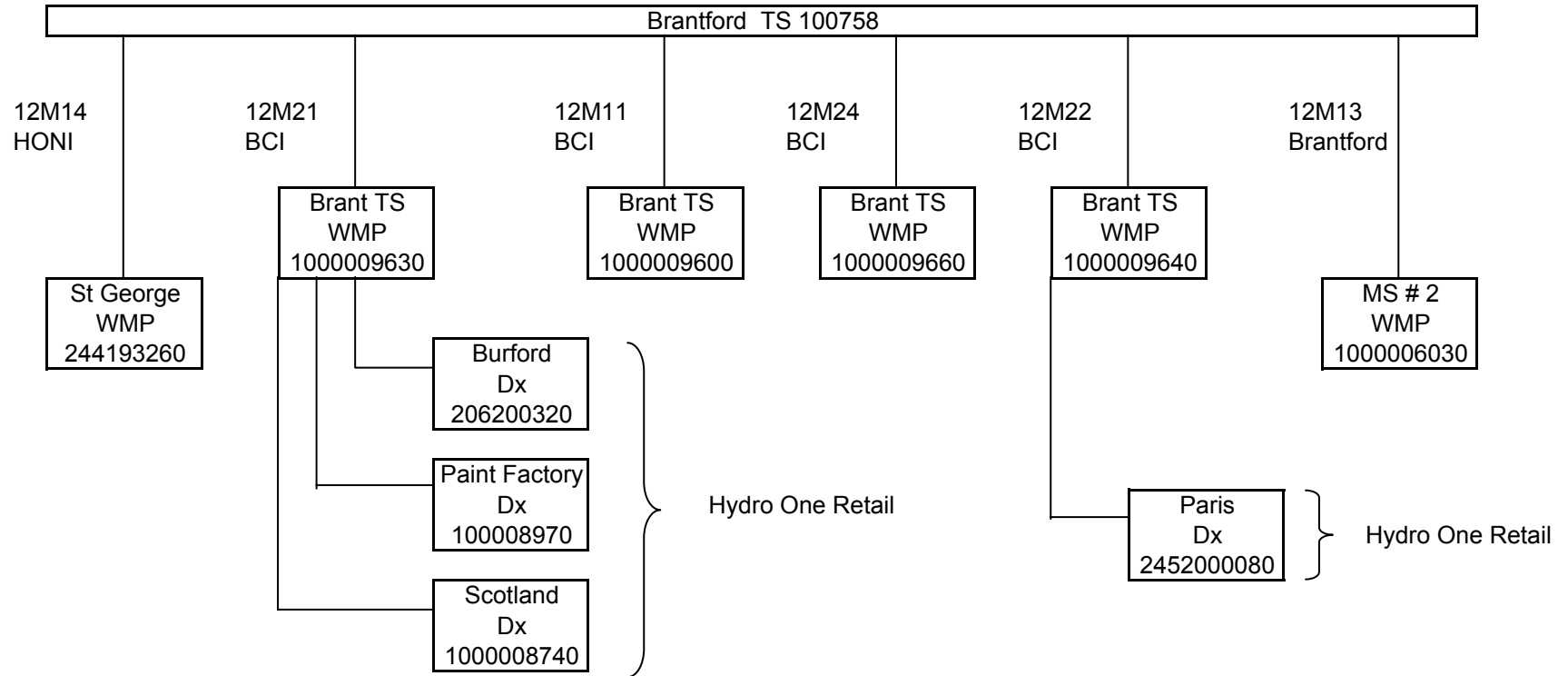
Appendix A1



NOTES

- 1 At the Mary Street TS on feeders 64M25 & 64M27, Brant County Power is a Wholesale Market Participant with Wholesale Delivery Points embedded in Brantford Power.
- 2 These metering points belong to Brant County Power.
- 3 Energy related charges are settled by the IESO.
- 4 Transmission charges are not settled at these Delivery Points; assumed to be settled upstream with Brantford Power.
- 5 Brantford Power is billing Brant County Power as an embedded distributor. Billing includes the volumetric distribution charge, regulatory charges, the fixed monthly service charge and GST at the GS > 50 kW rate.
- 6 At Blossom Ave., Hydro One has de-registered and Brant County Power is billing as GS > 50 kW rate for all line items including commodity

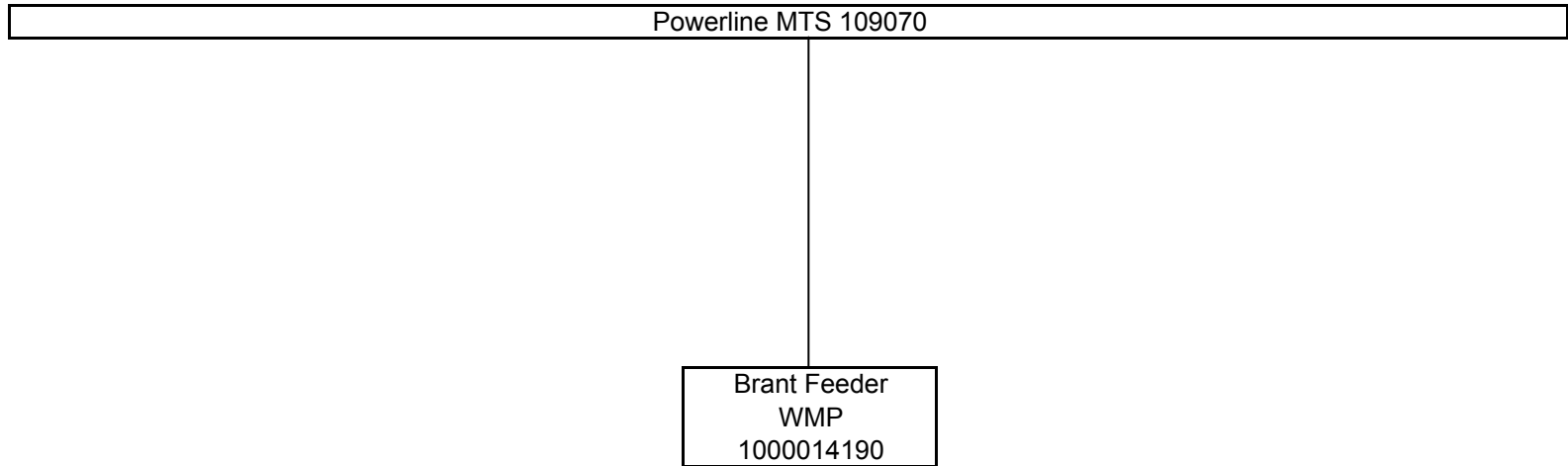
Appendix A2



NOTES

- 1 MS # 2 is a Brant County Power WMP Delivery Point embedded in Brantford Power distribution. Brantford Power bills Brant County Power as GS > 50 kW customer with exception of energy charges. Includes volumetric distribution, monthly service charge, retail transmission and regulatory charges. Credit is given for transformer ownership and primary metering.

Appendix A3



NOTES

- 1 This wholesale Market Participant delivery point is settled by the IESO.

TOTALIZATION TABLE FORM

Non-metered
Station Service (kW) 7.0 kW (up to DMP)

Facility Name	Powerline MTS
Effective Date	Dec. 20, 2005
MSP ID	1015
Prepared By	Veo Genovese

Breaker Ratio	T ₁		T ₂		T ₃	
	MMP Feeders	Total Feeders	MMP Feeders	Total Feeders	MMP Feeders	Total Feeders
MMP Name						
MMP1:Brant County Power Inc.	3					
MMP2:Brantford Power Inc.	5	8				
MMP3:						

A. ENERGY MARKET

Original Factors		
k1	k2	k3
0.0214	0.00	49.03

MMP #	DP ID	Summary 1	Summary 2	Meter Point ID	Channel No	Operator (+, or -)	UoM	Energy Flow Direction	Description of Measured Circuit	Ratio (3 dec.)	MEC	Assumed Voltage	Assumed P.F.	Service Type	CT Ratio	PT Ratio	Transformation		Radial Line			TLF
																	a(V) ²	b(V) ²	e(V) ²	f(V) ²	k ₁	
1	108070			1000014190	1	+	kwh	del	Powerline MTS PM4-B		0	120	0.95	W	60	140						
				1000014190	2	+	kvarh	del	Powerline MTS PM4-B													
				1000014190	3	+	kwh	rec	Powerline MTS PM4-B													
				1000014190	4	+	kvarh	rec	Powerline MTS PM4-B													
				20	1	+	kwh	del	Station Service estimate	0.375												

NOTE 1 : An agreement between MMP2 stipulates that Station Service and SSLA Transformation is to be split 3/8.

B. TRANSMISSION TARIFF

	Name
MMP1	Brant County Power Inc.
MMP2	

MMP#	DP ID	Summary 3	Summary 4	Meter Point ID	Channel No	Operator (+, -)	UoM	Energy Flow Direction	Description of Measured Circuit	Ratio (3 dec.)	MEC	Assumed Voltage	Assumed P.F.	Service Type	CT Ratio	PT Ratio	Transformation		Radial Line			TLF
																	a(V ²)	b(V ²)	e(V ²)	f(V ²)	k ₁	
1	109078			1000014190	1	+	kwh	del	Powerline MTS PM4-B													
				1000014190	3	+	kwh	rec	Powerline MTS PM4-B													
				20	1	+	kwh	del	Station Service estimate													
	109077			1000014190	1	+	kwh	del	Powerline MTS PM4-B													
				1000014190	3	+	kwh	rec	Powerline MTS PM4-B													
				20	1	+	kwh	del	Station Service estimate													

* Suffix by "N" or by "C" to specify if a network or a connection Delivery Point
** Hatched cells to be completed for meters used exclusively for Transmission Tariffs



**Power to Directors
Do Overhaul**

Do Demerits

Food by Number

Colours and PMS: corresponding to Pantone 130

Effective Date:

THE

Prepared By

Web Location:

TOTALIZATION TABLE FORM

[illegible]

**Micro-Organism Bank for
Sardines (2027)**

आपका आदेश

A ENERGY MARKET

[illegible]

Phase 1: Brandford Power in the LDC for Customer Profit

2. **Business Area Profile:** corresponding to Retail segment

B. TRANSMISSION TARGET

REPORT	
REPORT	

[illegible]

TOTALIZATION TABLE FORM

Facility Name	Brant TS
Effective Date	Nov. 1, 2006
MSP ID	1015
Prepared By	V. Genovese

Herb Oakburne

A. ENERGY MARKET

Breaker Ratio	T ₁			T ₂			T ₃		
	MMP Feeder	Total Feeder	MMP Feeder	Total Feeder	MMP Feeder	Total Feeder	MMP Feeder	Total Feeder	MMP Feeder
MMP1: Brant County Power Inc. (104290)									
MMP2: Brantford Power (102221)	2 + (2)								
MMP3: HON - Retail	3	8							
Bracket stipulates No. of feeder ownership by HT	1								

Original Factors		
k1	k2	k3
0.0338	-0.1374	187.56

MMP #	DP ID	Summary 1	Summary 2	Meter Point ID	Channel No	Operator (+ or -)	Unit	Energy Flow Direction	Description of Measured Circuit	Ratio (3 dec.)	MEC	Assumed Voltage	Assumed P.F.	Service Type	CT Ratio	PT Ratio	Transformation	Radial Line	Radial Line	TUF
				20	1	+	kWh	del	Estimated BRANT TS SS1+SS2	0.250		120	0.95	Y	120,000	140,000				
			100758C99	1000009600	1	+	kWh	del	M11 PME		0									
				1000009600	2	+	kVar	del												
				1000009600	3	+	kWh	rec												
				1000009600	4	+	kVar	rec												
				1000009630	1	+	kWh	del	M21 PME		0									
				1000009630	2	+	kVar	del												
				1000009630	3	+	kWh	rec												
				1000009630	4	+	kVar	rec												
				1000009640	1	+	kWh	del	M22 PME		0									
				1000009640	2	+	kVar	del												
				1000009640	3	+	kWh	rec												
				1000009640	4	+	kVar	rec												
				1000009660	1	+	kWh	del	M24 PME		0	120	0.95	Y	120,000	140,000				
				1000009660	2	+	kVar	del												
				1000009660	3	+	kWh	rec												
				1000009660	4	+	kVar	rec												
1	100758	100758EE		1000009660	1	+	kWh	del	Brantford DS F2											
				1000009660	2	+	kVar	del												
				1000009660	3	+	kWh	rec												
				1000009660	4	+	kVar	rec												
				1000009670	1	+	kWh	del	Home Hardware Brantford		0.0									
				1000009670	2	+	kVar	del												
				1000009670	3	+	kWh	rec												
				1000009670	4	+	kVar	rec												
				1000009740	1	+	kWh	del	Scotland DS		0.0									
				1000009740	2	+	kVar	del												
				1000009740	3	+	kWh	rec												
				1000009740	4	+	kVar	rec												
				0245200000	1	+	kWh	del	Paris PME											
				0244192360	1	+	kWh	del	St. George (27.6) PME		Public									

Page 2 of 1

Appendix C1

Service Address	Account Type	Account Number	Billing Period	Statement Date
COLBORNE ST W	BCP DISTRIBUTION	82681-004	06/01/08 to 07/01/08	Jul 16, 2008

IMPORTANT MESSAGES REGARDING YOUR ACCOUNT

Prior Charges \$10,009.34
 Payment \$10,009.34CR
 Balance Forward \$0.00

Current Charges

Your Electricity Charges
 Delivery \$12,127.58
 Total Electricity Charges \$12,127.58
 GST #86585 8773 RT0001 \$606.38
 Summary of Current Charges \$12,733.96
 Balance Owing \$12,733.96 ✓

COMMUNITY MESSAGES

CONSERVATION MESSAGES

"SIGN UP FOR PEAKSAVER AND RECEIVE A COOL \$25.
 GO TO BP.POWERSTAR.CA OR CALL 519-756-1360
 FOR MORE DETAILS".

Date: July 22/08
 Approved By: _____
 Auth. To Pay By: _____
 Payment Approved By: _____
 Received By: _____

G/L# 4714 (54%) - 6548.89
4716 (46%) - 5578.69
2290.63
606.38

Meter Number	Present Reading 07/01/08	Previous Reading 06/01/08	No. of Days	Mult.	Usage kWh/m3	Adjustment Factor	Adjusted Usage kWh	kva	Kw	Demand Billed	Meter Size
Electricity 3			30	1.0	0	1.037	0	4008.88	3571.00	3607.99	



P.O. Box 515, 220 Colborne Street
 Brantford, Ontario N3T 6L6
 TEL:(519) 756-1360 FAX:(519) 753-9884
 e-mail address - customerservices@brantford.ca



www.brantfordpower.com

www.brantford.ca

ENERGY MANAGEMENT INFORMATION

BILL DATE	CONSUMPTION KWH	AVERAGE KWH/DAY
Jul2008	0	0.00
		0.00

0	
0	
0	
0	
0	
0	

Electric J A S O N D J F M A M J J

Months

See back for Glossary of Terms

Appendix C2

Session 3 - [24 x 80]

File Edit View Communication Actions Window Help



07/23/08 13:38:48 ELECTRIC Demand History by Account

BL000889

07/23/08 13:38:50 Consumption Statistic for Jul 2008

BL5701M1

Account Number 82681-004

Name BRANT COUNTY POWER

Rate BCD

M Location 100-009710

COLBORNE ST W

U Mtr

	Sv	RSP	Rate	ChgID	Seq	Block	Chg	Size	Use	Amount	Ad
0	1		BCD	BCPDIS	362	2.4818000			3607.99	8954.31	
1			BCD	BCPREG	364	.7912000			3607.99	2854.64	
1			BCD	BCPFIY	363	.0000000			.00	318.83	
1			GSTPUR		900	.0500000			.00	606.38	

F1=Statistics

F12=Previous

Bottom

Appendix C3

Service Address	Account Type	Account Number	Billing Period	Statement Date
POWERLINE RD MS2	BCP TRANSMISSION	82681-003	06/01/08 to 07/01/08	Jul 16, 2008

Prior Charges \$11,950.96
 Payment \$11,950.96CR
 Balance Forward \$0.00

Current Charges

Your Electricity Charges \$13,642.58
 Delivery \$13,642.58
 Total Electricity Charges \$682.13
 GST #86585 8773 RT0001
 Summary of Current Charges \$14,324.71
 Balance Owning \$14,324.71

IMPORTANT MESSAGES REGARDING YOUR ACCOUNT

COMMUNITY MESSAGES

CONSERVATION MESSAGES

"SIGN UP FOR PEAKSAVER AND RECEIVE A COOL \$25.
 GO TO BP.POWERSTAR.CA OR CALL 519-756-1360
 FOR MORE DETAILS".

Date: July 22/08
 Approved By: _____
 Auth. To Pay By: _____
 Payment Approved By: _____
 Received By: _____

G/L# 4714(54%) - 7,366.99
4716(46%) - 6,275.59
2290.63 - 682.13

Meter Number	Present Reading	Previous Reading	No. of Days	Mult.	Usage kWh/m3	Adjustment Factor	Adjusted Usage kWh	kva	Kw	Demand Billed	Meter Size
Electricity 2	07/01/08	06/01/08	30	1.0	0	1.037	0	2063.44	1846.00	1857.10	



www.brantfordpower.com

P.O. Box 515, 220 Colborne Street
 Brantford, Ontario N3T 6L6
 TEL-(519) 756-1360 FAX-(519) 753-9884
 e-mail address - customerservices@brantford.ca



www.brantford.ca

ENERGY MANAGEMENT INFORMATION

BILL DATE	CONSUMPTION KWH	AVERAGE KWH/DAY
Jul2008	0	0.00
Jul2007	0	0.00

0	
0	
0	
0	
0	
0	
0	

Electric J A S O N D J F M A M J J

Months

See back for Glossary of Terms

Appendix C4

Session 4: [24 x 80]

File Edit View Communication Actions Window Help



07/23/08 13:37:56 ELECTRIC Demand History by Account

BL000801

07/23/08 13:37:58 Consumption Statistic for Jul 2008

BL5701M1

Account Number 82681-003

Name BRANT COUNTY POWER

Location 024-4121660

POWERLINE RD

Rate BCP

M

Location

POWERLINE RD

Mtr

U

Sv RSP Rate Chgid

Seq

Block Chg

Size

Use

Amount Ad

0

BCP BCP TCN

512

1.7879000

1857.10

3320.31

0

BCP BCP TNK

511

2.1137000

1857.10

3925.35

0

BCP BCP DIS

362

2.4818000

1857.10

4608.95

0

BCP BCP REG

364

.7812000

1857.10

1468.34

0

BCP BCP FIX

363

.0000000

.00

318.63

0

GST PMR

900

.0500000

.00

682.13

1

1

1

1

1

1

1

1

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Bottom

F12=Previous

F1=Statistics

Appendix C5

Service Address	Account Type	Account Number	Billing Period	Statement Date
COLBORNE ST	BCP DISTRIBUTION	82681-005	06/01/08 to 07/01/08	Jul 16, 2008

Prior Charges \$32,241.27
 Payment \$32,241.27CR
 Balance Forward \$0.00

Current Charges

Your Electricity Charges \$28,368.24
 Delivery \$28,368.24
 Total Electricity Charges \$1,418.41
 GST #86585 8773 RT0001 \$29,786.65
 Summary of Current Charges \$29,786.65
 Balance Owing

IMPORTANT MESSAGES REGARDING YOUR ACCOUNT

COMMUNITY MESSAGES

CONSERVATION MESSAGES

"SIGN UP FOR PEAKSAVER AND RECEIVE A COOL \$25.
 GO TO BP.POWERSTAR.CA OR CALL 519-756-1360
 FOR MORE DETAILS".

Date: July 22/08

Approved By: _____

Auth. To Pay By: _____

Payment Approved By: _____

Received By: _____

4714 (54%) 15,318.85
 4716 (46%) 13,049.39
 2290.63 1,418.41

Meter Number	Present Reading 07/01/08	Previous Reading 06/01/08	No. of Days	Mult.	Usage kWh/m3	Adjustment Factor	Adjusted Usage kWh	kva	Kw	Demand Billed	Meter Size
Electricity 4			30	1.0	0	1.037	0	9023.65	8570.00	8570.00	



www.brantfordpower.com

P.O. Box 515, 220 Colborne Street
 Brantford, Ontario N3T 6L8
 TEL-(519) 756-1360 FAX-(519) 753-9884
 e-mail address - customerservices@brantford.ca



www.brantford.ca

ENERGY MANAGEMENT INFORMATION

BILL DATE	CONSUMPTION KWH	AVERAGE KWH/DAY
Jul2008	0	0.00
		0.00

0	
0	
0	
0	
0	
0	

Electric J A S O N D J F M A M J J

Months

See back for Glossary of Terms

Appendix C6

Session 1 [24 x 80]

File Edit View Communication Actions Window Help



07/23/08 13:39:07 ELECTRIC Demand History by Account

BL000801

07/23/08 13:39:10 Consumption Statistic for Jul 2008 BL5701M1

Account Number 82681-005

Name BRANT COUNTY POWER

Rate BCD

M Location 100-013320

COLBORNE ST

U Mtr

Sv	RSP	Rate	ChgID	Seq	Block	Chg	Size	Use	Amount	Ad
0	1	BCD	BCPDIS	362	2.48	18000		8570.00	21269.03	

1	1	BCD	BCPREG	364	.79	12000		8570.00	6780.58	
---	---	-----	--------	-----	-----	-------	--	---------	---------	--

1	1	BCD	BCPFIX	363	.00	000000		.00	318.63	
---	---	-----	--------	-----	-----	--------	--	-----	--------	--

1	1	GSTPMR		900	.05	000000		.00	1418.41	
---	---	--------	--	-----	-----	--------	--	-----	---------	--

Bottom

F12=Previous

F1=Statistics

Appendix B

Compliance Officer Response – Dec. 15, 2008

Ontario Energy
Board
P.O. Box 2319
2300 Yonge Street
27th. Floor
Toronto ON M4P 1E4
Telephone: (416) 481-1967
Facsimile: (416) 440-7656
Toll Free 1-888-632-6273

Commission de l'énergie
de l'Ontario
C.P. 2319
2300, rue Yonge
27e étage
Toronto ON M4P 1E4
Téléphone: (416) 481-1967
Télécopieur: (416) 440-7656
Numéro sans frais : 1-888-632-6273



By Email: bnoble@brantcountypower.com

Mr. Bruce Noble
Chief Executive Officer
Brant County Power
65 Dundas Street East
Paris ON N3L 3H1

Re: Brantford Power Inc. distribution charges

Dear Mr. Noble:

I am writing in response to your letter of November 14, 2008 in respect of the rates being charged to Brant County Power Inc. ("BCP") by Brantford Power Inc. ("BPI"). Specifically, BCP has raised issues regarding the distribution charges that BPI has been charging BCP as an embedded distributor since May 2008.

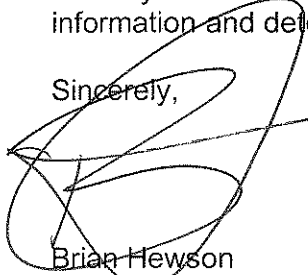
In its RB-2007-0698 Decision with Reasons, the Board approved BPI's request to charge its one embedded distributor using its >50 kW General Service rate schedule. In the November 14, 2008 letter, BCP set out the charges that it is being charged by BPI for the three feeders that deliver power from BPI's system to BCP. Based on a review of your correspondence, it appears that BPI is charging BCP, an embedded distributor in accordance with the Board's Decision using the rates approved by the Board in its EB-2007-0698 Rate Order. These charges appear to be the appropriate charges.

In regard to BCP's claim that it is not in fact an embedded distributor customer of BPI, as contemplated in the Board's decision, I do not believe the view is supported by the facts. BPI indicated in its rate application that it served an embedded distributor, BCP is the only licensed electricity distributor that BPI is providing service to.

As a result of our review, the Compliance Office does not see any matter of non-compliance to pursue. Therefore, we intend to close the compliance file. If BCP considers the rate that it is being charged to be unreasonable or inappropriate, BCP may, if the Board permits, make a submission in the current BPI rate proceeding.

Thank you for raising this matter, if you should have any questions regarding the above information and determination please do not hesitate to contact me at 416-440-7628.

Sincerely,



Brian Hewson
Chief Compliance Officer

Appendix C

Letter of Direction (EB-2007-0698) – Jan. 9, 2008

**Ontario Energy
Board**
P.O. Box 2319
27th. Floor
2300 Yonge Street
Toronto ON M4P 1E4
Telephone: 416- 481-1967
Facsimile: 416- 440-7656
Toll free: 1-888-632-6273

**Commission de l'énergie
de l'Ontario**
C.P. 2319
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2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416- 481-1967
Télécopieur: 416- 440-7656
Numéro sans frais: 1-888-632-6273



BY E-MAIL

January 9, 2008

George Mychailenko
President
Brantford Power Inc.
84 Market Street
Brantford, ON N3T 5N8

Letter of Direction

Dear Mr. Mychailenko

**Re: Brantford Power Inc.
Board File Number EB-2007-0698**

The Ontario Energy Board has issued its Notice of Application and Hearing relating to your rate application.

You are directed:

- 1) To arrange immediately for the enclosed English version of the Notice, headed with the Ontario government logo and the words "Ontario Energy Board", to be published in one issue of the English language newspaper having the highest paid circulation, according to the best information available, in Brantford Power Inc.'s service area;

Please note that invoices regarding publication are not to be sent to the Board.

- 2) If Brantford Power Inc. is a host distributor, to immediately, and no later than the date of publication of the Notice, serve a copy of the Notice directly on its embedded distributor(s);
- 3) To file with the Board an affidavit proving publication and, where applicable, service of the Notice immediately thereafter;

- 4) To make a copy of the application and evidence, and any amendments thereto, available for public review at Brantford Power Inc.'s office and on its website, if available; and,
- 5) To provide a copy of the application and evidence, and any amendments thereto, to any intervenor who requests a copy.

Board staff contact

Please direct any questions relating to this application to Christie Clark, Project Advisor at (416) 440-7683, or by e-mail at christie.clark@oeb.gov.on.ca.

Yours truly,

Original Signed by

John Pickernell,
Assistant Board Secretary

cc: James C. Sidlofsky
Borden Ladner Gervais LLP
Scotia Plaza, 40 King Street West
Toronto, ON M5H 3Y4