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April 15, 2009

Ms. Kirsten Walli, Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2701 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: <u>EB-2008-0221 Bluewater Power 2009 Rate Application</u> <u>Comments on Draft Rate Order</u>

Bluewater Power Distribution Corporation ("Bluewater Power") filed a Draft Rate Order on April 3, 2009 with Board Staff and all registered Intervenors.

Comments were received from Canadian Manufacturers and Exporters ("CME") related to the format of the customer impact information, specifically that for future applications there should be a 'Delivery Charge' subtotal along with a footnote explaining what line items are included in the subtotal. Bluewater Power accepts these comments as reasonable and we will consider the direction for future proceedings.

No comments were received from Board Staff, the Association of Major Power Consumers ("AMPCO"), School Energy Coalition ("SEC"), or Vulnerable Energy consumers Coalition ("VECC").

Bluewater Power has noted that the Sub-Total (Delivery) line on the Draft Rate Order Appendix G contains a minor error. The Smart Meter rider was shown as \$0.26 under each of the Current Bill and the 2009 Bill columns, but this amount was not included in the Sub-Total (Delivery) line. It was included in the Total Bill line. A revised Appendix G is attached. This error was not repeated in any other bill impact schedules.

Sincerely,

Alex Palimaka Vice President Corporate Services & General Counsel Bluewater Power Distribution Corporation Tel: (519) 337-8201 ext. 292 Fax: (519) 344-6094 email: apalimaka@bluewaterpower.com

/enc.

cc: All Intervenors

DRAFT RATE ORDER - REVISED APPENDIX G

Rate Impacts for Residential and General Service < 50 kW with Sub-total for 'Delivery' Line Items

REVISED April 9, 2009

		RPP:	Summer							
Residential			Current Bill			2009 BILL			CHANGE IMPACT	
1,00	0 kWh's	Metric	Volume	Rate	Charge	Volume	Rate	Charge	\$	%
	Monthly Service Charge		0	0.00000	\$13.64	0	\$-	\$13.64	\$0.00	0.0%
	Smart Meter Rate Rider				\$0.26			\$ 0.26	\$0.00	0.0%
	Distribution	kWh	1,000	\$0.0117	\$11.70	1,000	\$ 0.0188	\$ 18.80	\$7.10	60.7%
	Deferral/Variance Dispositions	kWh	1,000	\$0.0000	\$0.00	1,000	(\$0.0014)	(\$1.40)	(\$1.40)	0.0%
	Electricity (Commodity)	kWh	1,045	RPP-Summer	\$62.50	1,036	RPP-Summer	\$61.91	(\$0.59)	(0.9%)
	Transmission - Network	kWh	1,045	\$0.0047	\$4.91	1,036	\$0.0052	\$5.39	\$0.48	9.8%
	Transmission - Connection	kWh	1,045	\$0.0048	\$5.01	1,036	\$0.0050	\$5.18	\$0.17	3.4%
	Wholesale Market Service	kWh	1,045	\$0.0052	\$5.43	1,036	\$0.0052	\$5.39	(\$0.04)	(0.7%)
	Rural Rate Protection	kWh	1,045	\$0.0010	\$1.04	1,036	\$0.0013	\$1.35	\$0.31	29.8%
	Debt Retirement Charge	kWh	1,000	\$0.0070	\$7.00	1,000	\$0.0070	\$7.00	\$0.00	0.0%
	Sub-Total (Delivery)		0	\$0.0000	\$35.52	0	\$0.0000	\$41.87	\$6.35	17.9%
	TOTAL BILL				\$111.49			\$117.52	\$6.03	5.4%

		RPP:	Non-res.							
General Service <50 kW			Current Bill		2009 BILL			CHANGE IMPACT		
2,000	kWh's	Metric	Volume	Rate	Charge	Volume	Rate	Charge	\$	%
	Monthly Service Charge		0	0.00000	\$25.16	0	\$-	\$25.16	\$0.00	0.0%
	Smart Meter Rate Rider				\$0.26			\$ 0.26	\$0.00	0.0%
	Distribution	kWh	2,000	\$0.0128	\$25.60	2,000	\$ 0.0179	\$ 35.80	\$10.20	39.8%
	Deferral/Variance Dispositions	kWh	2,000	\$0.0000	\$0.00	2,000	(\$0.0017)	(\$3.40)	(\$3.40)	0.0%
	Electricity (Commodity)	kWh	2,089	RPP-Non-res.	\$129.05	2,071	RPP-Non-res.	\$127.88	(\$1.17)	(0.9%)
	Transmission - Network	kWh	2,089	\$0.0043	\$8.98	2,071	\$0.0048	\$9.94	\$0.96	10.7%
	Transmission - Connection	kWh	2,089	\$0.0043	\$8.98	2,071	\$0.0045	\$9.32	\$0.34	3.8%
	Wholesale Market Service	kWh	2,089	\$0.0052	\$10.86	2,071	\$0.0052	\$10.77	(\$0.09)	(0.8%)
	Rural Rate Protection	kWh	2,089	\$0.0010	\$2.09	2,071	\$0.0013	\$2.69	\$0.60	28.7%
	Debt Retirement Charge	kWh	2,000	\$0.0070	\$14.00	2,000	\$0.0070	\$14.00	\$0.00	0.0%
	Sub-Total (Delivery)		0	\$0.0000	\$68.98	0	\$0.0000	\$77.08	\$8.10	11.7%
	TOTAL BILL				\$224.98			\$232.42	\$7.44	3.3%

RPP: Non-res.