



October 5, 2009

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

RE: CLD Submission on Draft Issue List for EB-2009-0326

Proceeding to Determine a Just and Reasonable Rate to Recover the Costs Associated with Embedded Generators Having a Nameplate Capacity of 10 kW or Less

Dear Ms. Walli:

On September 21, 2009 the Ontario Energy Board (the "Board") issued Procedural Order No. 1 with respect to the Proceeding to Determine a Just and Reasonable Rate to Recover the Costs Associated with Embedded Generators Having a Nameplate Capacity of 10 kW or less. In the updated Intervenor list issued on September 22, 2009 All Electricity Distributors are identified as Intervenors.

The Coalition of Large Distributors ("CLD") comprises Enersource Hydro Mississauga, Horizon Utilities Corporation, Hydro Ottawa, PowerStream, Toronto Hydro-Electric System Limited, and Veridian Connections and will jointly be participating in this proceeding. The CLD considers the six proposed issues in the Draft Issues List as appropriate however, respectfully submits the following comments:

- 1) The revised amendments to the Distribution System Code and Retail System Code (EB-2009-0303) which were issued at the same time as the Notice of this Proceeding include the establishment of a separate account for all embedded retail generators, regardless of size. However, the Proceeding is currently only addressing embedded generators having a nameplate capacity of 10 kW or less. The CLD suggests that the Proceeding be expanded to include all FIT applications. The issues which will be discussed with respect to administering the embedded micro generation accounts are also applicable to > 10 kW embedded generation and it would be expeditious if they were addressed at the same time.
- 2) Under the heading Rate Design, the CLD would suggest another issue as follows:

Should the approved rate differ between consolidated FIT and load account settlement (i.e. where the FIT and load customers are the same, and share a common connection) and standalone FIT settlement?

The CLD suggests this issue because presumably there will be cost savings if FIT customers agree to accept their two account statements on one document and in one envelop.



Thank you for the opportunity to participate in this Proceeding. Please contact the undersigned if you have any further questions on this submission.

Yours truly,

(Original signed on behalf of the CLD)

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