

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an Application by Brantford Power Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of May 1, 2008 (EB-2007-0698);

AND IN THE MATTER OF a Motion by Brant County Power Inc. to review and vary the implementation of the Board's Interim Order dated April 21, 2008 in the rates proceeding;

AND IN THE MATTER OF a Motion by Brant County Power Inc. to review and vary the implementation of the Board's Decision dated July 18, 2008 and the Board's Order dated August 29, 2008 in the rates proceeding

BRANTFORD POWER INC.

**RESPONSES TO SCHOOL ENERGY COALITION ("SCHOOLS")
INTERROGATORIES**

DELIVERED DECEMBER 17, 2009

Responding Party

Brantford Power Inc.
84 Market Street
Brantford ON N3T 5N8

George Mychailenko

CEO
Tel: (519) 751-3522 Ext. 3226
Fax: (519) 753-6130
gmychailenko@brantford.ca

Counsel to Responding Party

James C. Sidlofsky
Borden Ladner Gervais LLP
Scotia Plaza, 40 King Street West
Toronto, ON M5H 3Y4
Tel: (416) 367-6277
Fax: (416) 361-2751
jsidlofsky@blgcanada.com

Heather Wyatt

Manager of Regulatory Compliance
and Governance, Board Secretary
Tel: (519) 751-3522 Ext. 3226
Fax: (519) 753-6130
hwyatt@brantford.ca

TO:

THE ONTARIO ENERGY BOARD

Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor, P.O. Box 2319
2300 Yonge Street
Toronto, ON M4P 1E4
Tel: (416) 481-1967
Fax: (416) 440-7656
Email: boardsec@oeb.gov.on.ca

AND TO:

BRANT COUNTY POWER INC.

Bruce Noble
Chief Executive Officer
Brantford County Power Inc.
65 Dundas St. E.
Paris, ON N3L 3H1
Tel: (519) 442-2215
Fax: (519) 442-3701
Email: bnoble@brantcounty.com

Scott Stoll
Aird & Berlis LLP
Suite 1800, Box 754
Brookfield Place
181 Bay Street
Toronto, ON M5J 2T9
Tel: (416) 865-4703
Fax: (416) 863-1515
Email: sstoll@airdberlis.com

SCHOOL ENERGY COALITION

Mr. Bob Williams
Co-ordinator
18th floor
439 University Avenue
Toronto, ON MRG 1Y8
Tel: (416) 340-2540
Fax: (416) 340-7571
Email: bwilliams@opsba.org

Mr. John De Vellis
Shibley Righton LLP
Barristers and Solicitors
Suite 700
250 University Avenue
Toronto, ON M5H 3E5
Tel: (416) 214-5232
Fax: (416) 214-5432
Email: john.devellis@shibleyrighton.com

Ms. Rachel Chen
Institutional Energy Analysis Inc.
Suite 700
250 University Avenue
Toronto, ON M5H 3E5
Tel: (416) 214-5218
Fax: (416) 214-5218
Email: rachel.chen@ieai.ca

- 1. Please file a copy of the original Notice of Application in EB-2007-0698 along with the newspaper advertisement if different.**

RESPONSE:

The original Notice of Application in EB-2007-0698 accompanies these responses as Attachment A. The newspaper advertisement, which was published in the Friday January 18, 2008 edition of the Brantford Expositor, was the same as the Notice of Application.

2. Please file the portions of the evidence from EB-2007-0698 pertaining to the change in status for Brant County Power Inc.

RESPONSE:

The following material is from BPI's 2008 EDR Application (EB-2007-0698), interrogatory responses, reply submissions and the Board Decision. Please also note that Run 2 of the Cost Allocation Information Filing which was submitted in 2006 is part of Attachment F(b) of the responses to the Board Staff Interrogatories.

- **EDR 2008 APPLICATION DECEMBER 20, 2007:**

Exhibit 1, Tab 1, Schedule 12, Page 1 of 1

EXPLANATION OF HOST AND EMBEDDED UTILITIES:

Brantford Power Inc. acts as a host utility to Brant County Power Inc. at the Brantford Transformer Station, Mary Street, Brantford.

**Exhibit 3, Tab 2, Schedule 6, page 1 and 2
Bridge – Normalized vs. Test Year**

The percentage variations between the 2007 normalized and 2008 forecast customer counts by class are presented in the following table.

Residential	1.6%
GS < 50 kW	1.4%
GS > 50 kW	1.1%

The growth in this period appears normal. During the 2007 Test Year, Brantford Power Inc. will begin billing three IESO wholesale connection points that service an embedded distributor (Brant County Power Inc.). These three connections will be used to bill distributor related demand charges only.

- **BOARD STAFF INTERROGATORIES, MAY 5, 2008**

**Brantford Power Inc.
Responses to Board Staff Interrogatories
Page 112 of 132**

9 COST ALLOCATION

Revenue Offset – Revenue from the Embedded Distributor

10.1 Ref: Exhibit 1/Tab 1/Schedule 12

a. Please provide a brief description of BPI.s facilities that are used totally or in part by the embedded distributor Brant County Power Inc.

RESPONSE:

There are three, 27.6 KV BPI feeders that are partially used to feed Brant County Power embedded load:

1. PM1 . from Powerline MTS
2. M25 . from Brantford TS
3. M27 . from Brantford TS

b. Please provide a history, beginning in 2004 if applicable, of energy delivered to Brant County Power Inc. as an embedded distributor.

RESPONSE:

The yearly energy delivered to Brant County Power for 2004 to 2006 is provided in Table 10.1.b. BPI uses the energy values from its billing system. The data values may be found in columns D and P of the BPI Spreadsheet referred to in response to interrogatory 8.1.

Table 10.1.b

	2004	2005	2006
kWh	76,359,678	74,284,928	73,543,262
kW	167,071	163,253	160,356

c. Please provide information on revenue received from Brant County Power Inc. as an embedded distributor.

RESPONSE:

No revenue has been received from Brant County Power Inc. as an embedded distributor. For a more detailed explanation, please refer to OEB Staff Interrogatory Response 10.3 b.

d. Please confirm that any revenue from Brant County Power Inc. is used as a revenue offset, to determine the base revenue requirement to be collected from BPI.s distribution customers, and indicate how that calculation is made in this application.

RESPONSE:

No revenue has been received from Brant County Power Inc.

Page 115 of 132
10.3 Ref: Exhibit – Informational Filing EB-2007-0001/
Sheet O1 Revenue to Cost Summary worksheet

a. Please describe the nature of the costs that are allocated to the Embedded Distributor customer category by BPI in its Informational filing, which add up to a class revenue requirement of approximately \$300,000 in the Informational Filing.

RESPONSE:

The nature of the costs that are allocated to the Embedded Distributor customer category in the Cost Allocation Informational Filing are listed below.

USoA Account	Accounts	Expense Type	Approved Amount (2008 Test) (Ref b)	Embedded Distributor	Allocation %
5405	Supervision	G&A	\$0	\$494	N/A
5410	Community Relations - Sundry	G&A	\$125,171	\$1,145	0.9%
5420	Community Safety Program	G&A	\$13,920	\$362	2.6%
5515	Advertising Expense	G&A	\$0	(\$3)	N/A
5605	Executive Salaries and Expenses	G&A	\$429,070	\$4,060	0.9%
5610	Management Salaries and Expenses	G&A	\$723,218	\$3,226	0.4%
5615	General Administrative Salaries and Expenses	G&A	\$726,087	\$9,181	1.3%
5620	Office Supplies and Expenses	G&A	\$52,654	\$3,928	7.5%
5630	Outside Services Employed	G&A	\$179,500	\$694	0.4%
5635	Property Insurance	G&A	\$0	\$387	N/A
5645	Employee Pensions and Benefits	G&A	\$110,367	\$2,174	2.0%
5650	Franchise Requirements	G&A	\$53,871	\$1,125	2.1%
5655	Regulatory Expenses	G&A	\$215,000	\$2,179	1.0%
5660	General Advertising Expenses	G&A	\$26,000	\$353	1.4%
5665	Miscellaneous General Expenses	G&A	\$187,617	\$12,972	6.9%
5670	Rent	G&A	\$0	\$4,676	N/A
5675	Maintenance of General Plant	G&A	\$0	\$539	N/A
5680	Electrical Safety Authority Fees	G&A	\$20,000	\$78	0.4%
6105	Taxes Other Than Income Taxes	G&A	\$12,298	\$3,782	30.8%
6205	Donations	G&A	N/A	\$81	N/A
5315	Customer Billing	Cust Rel Cost	\$509,848	\$1	0.0%
5705	Amortization Expense - Property, Plant, and Equipment	Dep and Amort	\$3,027,657	\$55,005	1.8%
5710	Amortization of Limited Term Electric Plant	Dep and Amort	\$0	\$2,395	N/A
5005	Operation Supervision and Engineering	Distribution	\$266,919	\$3,551	1.3%
5010	Load Dispatching	Distribution	\$17,887	\$205	1.1%

5012	Station Buildings and Fixtures Expense	Distribution	\$39,832	\$2,757	6.9%
5014	Transformer Station Equipment - Operation Labour	Distribution	\$6,778	\$200	3.0%
5015	Transformer Station Equipment - Operation Supplies & Expenses	Distribution	\$55,950	\$59	0.1%
5020	Overhead Distribution Lines and Feeders - Operation Labour	Distribution	\$3,298	\$24	0.7%
5025	Overhead Distribution Lines & Feeders - Operation Supplies & Expenses	Distribution	\$15,081	\$531	3.5%
5040	Underground Distribution Lines and Feeders - Operation Labour	Distribution	\$1,139	\$31	2.7%
5045	Underground Distribution Lines & Feeders - Operation Supplies & Expenses	Distribution	\$20,669	\$150	0.7%
5085	Miscellaneous Distribution Expense	Distribution	\$129,239	\$3,464	2.7%
5105	Maintenance Supervision and Engineering	Distribution	\$306,914	\$9,075	3.0%
5110	Maintenance of Buildings and Fixtures - Distribution Stations	Distribution	\$4,337	\$75	1.7%
5114	Maintenance of Distribution Station Equipment	Distribution	\$17,703	\$1,042	5.9%
5120	Maintenance of Poles, Towers and Fixtures	Distribution	\$167,336	\$7,225	4.3%
5125	Maintenance of Overhead Conductors and Devices	Distribution	\$212,429	\$11,833	5.6%
5135	Overhead Distribution Lines and Feeders - Right of Way	Distribution	\$364,402	\$12,595	3.5%
5145	Maintenance of Underground Conduit	Distribution	\$72,896	\$889	1.2%
5150	Maintenance of Underground Conductors and Devices	Distribution	\$121,982	\$2,579	2.1%
6110	Income Taxes	PILS Input	\$1,889,507	\$38,956	2.1%
6005	Interest on Long Term Debt	Interest	\$2,098,892	\$39,815	1.9%
Total				\$243,890	

Page 116 of 132

10.3(b). Considering that the revenue to cost ratio for the Embedded distributor class is 5.84% in the informational filing, virtually all of the apparent revenue in 2004 was an allocation of Miscellaneous Revenue which may in actuality have been collected from all the other customer groups assumed in the model. Please describe any studies or other steps that BPI has taken since to ensure that is distribution customers are treated fairly relative to the embedded distributor. In particular, has BPI sought approval of rates to be paid by the Embedded Distributor class for the wheeling service proved though its facilities?

RESPONSE:

After the 2008 Rate Order, BPI intends to charge the Embedded Distributor the GS>50 kW distribution rate to ensure that BPI's customers are treated fairly. This was also stated in Exhibit 3, Tab 2, Schedule 6, page 2 of the Application. Please note that the correct period is the 2008 Test Year and not the 2007 Test Year as indicated at that page of the Application.

Issue 11.2 Retail Transmission Service Rates
Page 118, 119 of 132

Please provide a description of how the changed cost of wholesale transmission delivered to the Brantford Transformer Station pursuant to the Retail Transmission Service rates described in Exhibit 9, and how the changed cost will be reflected in the Applicants settlement with the Embedded Distributor.

RESPONSE:

The Ontario Uniform Transmission Rate Order is reflected in the Retail Transmission Rate by reducing the Retail Transmission rates by more than they would have been reduced prior to the rate order.

[Please note that the original version of this interrogatory response contained a table of retail transmission rates. those rates were subsequently revised by both BPI and the Board. The original table has not been reproduced in this extract.]

The Embedded Distributor is being billed the GS> 50 kW network and connection rates. This is currently the case and will continue going forward.

- **BOARD STAFF SUBMISSION JUNE 3, 2008**

Pages 27-29

Cost Allocation and Rate Design
Customer Classification

Background

Brantford Power is requesting approval of rates for a single General Service > 50 kW class, continuing its current approved structure. Brantford County Power, an embedded distributor, is included in that class, as is a customer whose load is larger than 5000 kW. Each of these customers is shown as a separate entity in the cost allocation Informational Filing EB-2007-0001 although the individual load consumption data is not provided due to the confidentiality provisions in that filing.

Discussion and Submission

Board staff notes that neither of the customers mentioned has intervened in this proceeding.

Board staff submits that host distributors should in general be proposing a rate for embedded distributors as part of their re-basing applications. However, the Board has not made this a requirement and the practice of billing embedded distributors under the same General Service rates as ordinary customers in the host distributor's own service area is not unusual. In the present application, a separate rate is not requested. Board staff notes that the issue would become moot if the host and embedded distributor were to become a single distributor.

Board staff submits that a distributor with a customer larger than 5000 kW would normally apply for approval of a Large User rate. The reason given for not having designed a Large User rate is that the customer is fairly new in this size range and the time and resources were not available to include this task in the application. Staff notes that, according to the results of the cost allocation study summarized below, the revenue to cost ratio for the large customer is not very much different from the ratio for the General Service class as a whole.

Cost Allocation Background

Brantford Power filed its cost allocation Informational Filing EB-2007-0001, with Run 2 showing the embedded distributor and the Large Use customer as separate entities. In its pre-filed evidence with this application, Brantford Power has provided a revenue to cost ratio for the General Service class as a single entity including the two customers, which are set out in the following table. Column 1 shows the ratio for the whole class and for the class net of the two atypical customers. Column 2 shows the Board's target range where applicable.

**Table 15
Revenue to Cost Ratios**

Customer Class	Informational Filing and Pre-filed Submission		Target Range
	<i>Col 1 (%)</i>		<i>Col 2 (%)</i>
Residential	91.2		85 – 115
GS < 50 kW	82.7		80 – 120
GS > 50 kW		139.6	
GS 50 – 5000 kW	152.7		80 – 180
Large Use > 5000 kW	132.6		85 – 115
Embedded Distributor		5.8	
Street Lights	36.9		70 – 120
Sentinel Lights	10.0		70 – 120
Unmetered Scattered Load	109.7		80 – 120
Back-up / Standby		115.7	

Discussion and Submission

Brantford Power is proposing rates that will generate revenue from each class in proportions very similar to those in the Informational Filing. They are also proposing to increase all distribution rates by a nearly identical percentage. It is reasonable to conclude that the revenue to cost ratios would be close to those in column 1 above.

Board staff notes that the ratios are within the target range except for Streetlighting and Sentinel Lights. Staff points out that the Board has decided in other applications that distributors are to adjust their rates over three years so as to reach the target range before the expected date of the next rebasing. In some decisions, when starting from a ratio similar to Streetlighting, the Board has ordered a phase-in over two years in equal steps, for example a ratio of 54% in 2008 and 70% in 2009. In several decisions, when starting from a ratio near to Sentinel Lighting, the Board has ordered that rates should yield a ratio half-way to the target in 2008, i.e. 40%, followed by two adjustments to 55% in 2009 and 70% in 2010.

If a separate rate were to be designed for the Large User, the results of the Informational Filing would suggest that the rate would be lower than that for the customers smaller than 5000 kW, in order to reach the target range before the next re-basing.

Brantford Power has submitted that it receives no revenue from its embedded distributor, Brantford County Power Inc., which would produce a ratio of zero.³⁷ The Informational Filing shows approved revenue that is not quite zero, but the apparent "revenue" is predominantly miscellaneous revenue not associated with embedded distribution but assigned that way by default in the cost of service model. Staff welcomes any further clarification from Brantford Power concerning the actual situation and its intentions for billing its embedded distributor in the future.

- **BPI REPLY SUBMISSION JUNE 17, 2008**
Page 35 of 42

EMBEDDED DISTRIBUTOR

119. Staff have requested further clarification from BPI concerning the actual situation and its intentions for billing its embedded distributor in the future.
[Page 29]
120. **BPI RESPONSE:** BPI commenced billing its embedded distributor, Brant County Power Inc. at the GS>50 kW rate as of May 1, 2008 as noted in the Application (Exhibit 3, Tab 2, Schedule 6, page 2) and response to Staff IR 10.3 (b).

- **BOARD DECISION – JULY 18, 2008**
Page 16

COST ALLOCATION AND RATE DESIGN

The Company determined its total service revenue requirement to be \$18,649,709. The total revenue offsets in the amount of \$1,422,329 reduce the Company's base service revenue requirement to \$17,277,380 to be recovered from base rates.

Rate Classes

The Company is a host to one embedded distributor, Brant County Power, and also serves one large customer with demand greater than 5000 kW. Board staff noted that the Company did not propose separate rate classifications for these loads; rather, they are being served within the GS>50 kW rate class.

With respect to the large customer, the Company noted that the customer is new in this size range and the Company did not want to jeopardize the timing of its application for

2008 rates by designing and implementing a new rate class. The Company proposed that it would undertake a cost allocation study to support the establishment of a large user rate class for its next rate rebasing.

With respect to the embedded distributor, Brantford clarified in response to an interrogatory that it intends to begin billing the embedded distributor in the 2008 rate year, and will do so by using the GS>50 kW rate classification. Board staff submitted that host distributors should be proposing a rate for embedded distributors, but noted that the practice of using the General Service rate is not unusual.

Board Findings

The Board accepts as reasonable the Company's proposal to defer the rate classification matter for the time of its next rebasing application. The Board notes that the issue of rates for embedded distributors is in the scope of a study currently underway at the Board (EB-2007-0031), the Rate Design study. The Board expects Brantford to keep itself informed as to potential developments through that process.

- **BRANTFORD POWER INC. DRAFT RATE ORDER, SUBMISSION IN RESPONSE TO BOARD DECISION ON 2008 ELECTRICITY DISTRIBUTION RATES JULY 31, 2008**
Page 14 of 27

COST ALLOCATION AND RATE DESIGN

In the Decision, the Board accepted BPI's proposals to defer rate classification matters pertaining to its large customer and embedded distributor for its next rebasing application. BPI acknowledges the Board's direction to keep informed of potential developments through the Board's Rate Design Study (EB-2007-0031).
[Page 16]

3. The Board's Rate Order in EB-2007-0698 states that the new rates were effective September 1, 2008. Please:

(a) advise whether new rates for Brant County were in fact charged as of May 1, 2008. If so, please explain why.

RESPONSE:

BCPI was not charged rates approved by the OEB for implementation on September 1, 2008 prior to September 1, 2008. Rather BCPI was charged the rates in effect as at May 1, 2008 beginning May 1, 2008.

(b) set out the amount charged to Brant County from May 1 to September 1, 2008 that was in excess of the amount that should have been charged under the previous rate order.

RESPONSE:

BCPI was not charged any amounts in excess of those set out in the previous rate order.

(c) advise whether any other rate classes were charged new rates prior to September 1, 2008.

RESPONSE:

No rate classes were charged new rates prior to September 1, 2008.

ATTACHMENT A

REFERENCE: QUESTION 1



EB-2007-0698

**NOTICE OF APPLICATION AND HEARING FOR AN
ELECTRICITY DISTRIBUTION RATE CHANGE
Brantford Power Inc.**

Brantford Power Inc. has filed an application with the Ontario Energy Board, received on December 21, 2007, under section 78 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), seeking approval for changes to the rates that Brantford Power Inc. charges for electricity distribution, to be effective May 1, 2008. The Board has assigned the application file number EB-2007-0698. The Board's decision on this application may have an effect on all of Brantford Power Inc.'s customers.

Any change to Brantford Power Inc.'s distribution rates will cause Brantford Power Inc.'s delivery charges to change. Delivery charges are one of four regular items on residential and general service customers' electric bills and vary depending on the amount of electricity consumed.

Brantford Power Inc. is seeking approval of \$18,649,742 as the annual revenue it requires to provide electricity distribution. Brantford Power Inc. indicates that if the application is approved as filed, a residential customer consuming 1,000 kWh per month would experience an approximate 4.1% decrease in the electricity bill. A small general service customer consuming 2,000 kWh per month and having a monthly demand of 50 kW or lower would see an approximate 5.1% decrease in the electricity bill.

How to see Brantford Power Inc.'s Application

Copies of the application are available for inspection at the Board's office in Toronto and on its website, www.oeb.gov.on.ca, and at Brantford Power Inc.'s office and may be on its website.

How to Participate

You may participate in this proceeding in one of three ways:

1. Send a Letter with your Comments to the Board

Your letter with comments will be provided to the Board members deciding the application, and will be part of the public record for the application. Your letter must be received by the Board no later than **30 days** from the publication or service date of this notice. The Board accepts letters of comment by either post or e-mail at the addresses below.

2. Become an Observer

Observers do not actively participate in the proceeding but monitor the progress of the proceeding by receiving documents issued by the Board.

You may request observer status in order to receive documents issued by the Board in this proceeding. If you become an observer, you need to contact the applicant and others in order to receive documents that they file in this proceeding and they may charge you for this. Most documents filed in this application will also be available on the Board's website. Your request for observer status must be made in writing and be received by the Board no later than **10 days** from the publication or service date of this notice. The Board accepts observer request letters by either post or e-mail at the addresses below; however, two paper copies are also required. You must also provide a copy of your letter to the applicant.

3. Become an Intervenor

You may ask to become an intervenor if you wish to actively participate in the proceeding. Intervenor status is eligible to receive evidence and other material submitted by participants in the hearing. Likewise, intervenors will be expected to send copies of any material they file to all parties to the hearing.

Your request for intervenor status must be made by letter of intervention and be received by the Board no later than **10 days** from the publication or service date of this notice. Your letter of intervention must include a description of how you are, or may be, affected by the outcome of this proceeding; and if you represent a group, a description of the group and its membership. The Board may order costs in this proceeding. You must indicate in your letter of intervention whether you expect to seek costs from the applicant and the grounds for your eligibility for costs. You must provide a copy of your letter of intervention to the applicant.

The Board intends to proceed with this application by way of written hearing. The Board will not hold a written hearing if a party satisfies the Board that there is good reason for holding an oral hearing. If you object to the Board holding a written hearing, your letter of intervention must include reasons why an oral hearing is necessary.

If you already have a user ID, please submit your intervention request through the Board's web portal at www.errr.oeb.gov.on.ca. Additionally, two paper copies are required. If you do not have a user ID, please visit the Board's website under e-filings and fill out a user ID password request. For instructions on how to submit and naming conventions please refer to the RESS Document Guidelines found at www.oeb.gov.on.ca, e-Filing Services. The Board also accepts interventions by e-mail, at the address below, and again, two additional paper copies are required. Those who do not have internet access are required to submit their intervention request on a CD or diskette in PDF format, along with two paper copies.

How to Contact Us

In responding to this Notice, please include Board file number EB-2007-0698 in the subject line of your e-mail or at the top of your letter. It is also important that you provide your name, postal address and telephone number and, if available, an e-mail address and fax number. All communications should be directed to the attention of the Board Secretary at the address below, and be received no later than 4:45 p.m. on the required date.

Need More Information?

Further information on how to participate may be obtained by visiting the Board's website at www.oeb.gov.on.ca or by calling our Consumer Relations Centre at 1-877-632-2727.

IMPORTANT

IF YOU DO NOT FILE AN OBJECTION TO A WRITTEN HEARING OR DO NOT REQUEST TO PARTICIPATE IN THIS PROCEEDING IN ACCORDANCE WITH THIS NOTICE, THE BOARD MAY PROCEED IN YOUR ABSENCE AND YOU WILL NOT BE ENTITLED TO ANY FURTHER NOTICE IN THIS PROCEEDING.

Addresses

The Board:

Post:
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Board Secretary

Filings : www.errr.oeb.gov.on.ca
E-mail: Boardsec@oeb.gov.on.ca

Tel: 1-888-632-6273 (toll free)
Fax: 416-440-7656

The Applicant:

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

Attention: George Mychailenko, President

Email: gmychailenko@brantford.ca

Tel: 519-751-3522
Fax: 519-751-3522

Counsel for the Applicant:

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

E-mail: jsidlofsky@blgcanada.com

Tel: 416-367-6277
Fax: 416-361-2751

DATED at Toronto, January 9, 2008

ONTARIO ENERGY BOARD

Original Signed By

Original Signed By

John Pickernell,
Assistant Board Secretary