



April 9, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: Further Revised Proposed Amendments to the Distribution System Code, the Retail Settlement Code and the Standard Supply Service Code
Submission of AMPCO's Comments
Board File No.: EB-2007-0722**

AMPCO has reviewed the further proposed revisions and makes the following comments.

In general, these further revisions improve upon the earlier changes and AMPCO supports most of the changes as they provide clarification of the intent and present a fair balance of customer and distributor needs and situations.

AMPCO specifically notes and applauds the change to symmetrical treatment of all customers with respect to a disconnection notice for non-payment.

Also, AMPCO notes the acceptance by the Board that distributors may develop innovative payment smoothing plans in addition to offering an equal payment plan. This option may allow distributors to improve cash flow, reduce customer hardship and hopefully mitigate write-offs.

Specific Comments:

The acceptance of cash for payment when attending premises is problematic. Some distributors may be comfortable with this arrangement, but in other cases the personal security of staff may be an issue. The Board should not mandate on this, as it may either introduce a safety concern for attending staff or cause distributors to attend a disconnection with more staff than would otherwise be needed.

The acceptance of debit card payment to avoid disconnection seems reasonable if credit cards will be accepted as well.

The acceptance of landlord agreements and other third party liability arrangements is noted and supported.

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The deferral to an effective date of January 1, 2011 for implementation is also supported. Generally, AMPCO would support a practice by the Board moving forward to implement code changes annually, especially where they require changes to systems and business arrangements such as are covered in many of these amendments. Such regularity would go a long way to help distributors manage their system-related costs.

Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely yours,

ORIGINAL SIGNED

Adam White
President
Association of Major Power Consumers in Ontario