



January 10, 2011

Ms. Kirsten Walli
Ontario Energy Board
PO Box 2319
27th Floor, 2300 Yonge Street
Toronto, Ontario M4P1E4

**Re: Consultation on Regulated Price Plan Time-of-Use Pricing
Board File No.: EB-2010-0364**

Dear Ms. Walli,

Chatham-Kent Hydro Inc. and Middlesex Power Distribution Corporation welcome the opportunity to comment on the "Consultation on Regulated Price Plan Time-of-Use Pricing".

Please find attached a joint submission from Chatham-Kent Hydro and Middlesex Power Distribution Corporation.

If you have any further questions please do not hesitate to contact David Ferguson at (519) 352-6300, extension 558 or davidferguson@ckenergy.com.

Regards,

[Original Signed By]

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CC: Dave Kenney, President of Chatham-Kent Hydro & Middlesex Power Distribution
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Consultation on Regulated Price Plan Time-of-Use Pricing

EB-2010-0364

Comments from:
Chatham-Kent Hydro Inc. and
Middlesex Power Distribution Corporation

January 10, 2011

Chatham-Kent Hydro Inc. (“CKH”) & Middlesex Power Distribution Corporation (“MPDC”) are pleased to comment on the “Consultation on Regulated Price Plan Time-of-Use Pricing”

Amongst the first distributors to install smart meters in Ontario, CKH & MPDC have taken a leading role in Time-of-Use program adoption. After reviewing The Brattle Group’s report issued December 8, 2010 and attending the Stakeholder Conference on December 21, 2010, CKH & MPDC would like to share the recommendations herein.

Overall, CKH & MPDC agree there may be opportunities to enhance TOU Pricing but feel that it is premature to implement any changes to the current structure at this time. The current TOU structure is too far along to now successfully implement efficient changes, and there is insufficient experience to define the right changes. Amendments at this stage would more than likely cause customer confusion and create potential re-education and service costs.

Consistent with the Board’s draft 2011 – 2014 Business Plan, CKH & MPDC believe that a one to two year period under the current structure is needed to observe and collect data reflective of behavior specific to Ontario consumers. Once experience is available to show how the current program has been accepted and what behavior changes have been driven, it would then be beneficial to consider the options detailed in The Brattle Report or a new option that may become evident. With the benefit of actual historical experience, the industry would be better positioned to recommend an optimal solution in order to ensure that TOU prices are fair and meet the objective of ultimately reducing overall power system costs.

When the time does come to consider changes, CKH & MPDC would recommend that a key guiding principal be that the structure remains clear, simple and easy to understand for the consumer.

In summary, CKH & MPDC would recommend the TOU pricing structure remain as originally implemented until such time as additional experience allows for a more Ontario-specific design.