



ORANGEVILLE HYDRO

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ONTARIO ENERGY BD

March 11, 2011

By Courier

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
PO Box 2319  
2300 Yonge Street  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Application for Extension of Time-of-Use Pricing Date (EB-2010-0218)**

In accordance with the Ontario Energy Board's letter of August 4, 2010 regarding determination under Section 1.2.1 of the Standard Supply Service Code to mandate time-of-use ("TOU") pricing for regulated price plan customers, Orangeville Hydro Limited is hereby making application for an exemption from its mandated TOU pricing date (the "TOU Date") of June 2011 to September 2011 to appear on October bills.

To be clear, Orangeville does not request that Orangeville be exempted from moving its Regulated Price Plan (RPP) customers to Time-of-Use Pricing (TOU), per the Standard Supply Service Code (SSSC). Orangeville acknowledges that TOU is a matter of provincial energy policy and that both the Board and Orangeville have roles to play in implementing that policy.

In the past 18 months, Orangeville has implemented a new ODS, new CIS and AMI network and coordinating the roll-out and training on this technology has caused additional delays that were not anticipated when testing began. Orangeville Hydro Limited is currently engaged in testing with the IESO and we have already fallen behind our original wave testing dates. The testing has proven to be more resource intensive than anticipated and we have been working directly with the IESO to move our testing dates out to ensure that we can be successful moving forward.

As per the OEB's mandate, our next update is required by March 10, 2011 and in discussions with our partners, vendors and testing resources, we feel it would be best for our LDC to request an extension on our TOU billing date to September 2011.

In summary, the dates filed on our monthly reporting when it was started were our "best guess" at the time. Now that we have established a work plan and have fallen behind in our wave testing, more accurate target dates have been set.

The process to achieve TOU billing is a complex and resource intensive endeavour and we believe our customers will be much better served with an extension to September 2011 and Orangeville Hydro Limited still meets the objective of implementing TOU rates in our service territory in a timely manner. It will also be prudent to extend our TOU dates to avoid any billing errors that may result from lack of system testing.

I look forward to hearing from you.

Kindest regards,

**Orangeville Hydro Limited**



Ruth Tyrrell  
Vice-president