

June 21, 2011

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

Dear Ms. Walli:

Re: Application for Adjustment to Mandated Time-of-Use End Date

Application

This application, submitted by Tillsonburg Hydro Inc. ("THI"), seeks an extension to THI's mandated Time-of-Use ("TOU") end date pursuant to the Determination under Section 1.2.1 of the Standard Supply Service Code to Mandate TOU Pricing for Regulated Price Plan ("RPP") Customers Board File EB-2010-0218 ("Determination"). In summary, THI requests that the Ontario Energy Board ("Board") adjust THI's mandatory TOU end date from June 2011 to January 15th, 2012 based on the following:

Background

Tillsonburg Hydro Inc. has been actively implementing all the required components of the smart metering initiative since 2008 when it participated in the London Hydro Consortium in the procurement of smart metering infrastructure.

An agreement to purchase Elster metering technology was completed in September 2009 with mass meter installations beginning in November 2009 and communications infrastructure beginning in February 2010. All meter installations were performed using internal staff and were substantially completed prior to December 31, 2010.

As indicated in its most recent filing (end of April 2011), 100% of Residential and 99% of General Service < 50 meters have been installed.

Registration with the MDM/R was completed in October 2009. Enrolment Testing was completed in August 2010, System Integration Testing ("SIT") was completed in September 2010 and Qualification Testing ("QT") was completed in October 2010. On October 26, 2010 THI completed the Self-Certification process for transition into the MDM/R Production environment. Transition to Production occurred on November 1, 2010.

THI's approach, when transitioning to Production, was to transition all RPP customers and continue to transition new customers as necessary. To this end, all current RPP eligible customers are presently enrolled with the MDM/R.

Further to this approach, THI would continue to bill RPP customers as normal and focus on the development and/or refinement of business processes leading up to its required TOU implementation date (June 2011).

Since receiving the Board issued Determination date on June 24, 2010, THI has made every effort to achieve its required TOU implementation date.

Factors Considered in Making Request

A concerted effort has been made to achieve the required TOU implementation date, however a number of factors, as outlined below, have resulted in a need request an adjustment to THI's mandatory TOU implementation date.

- Testing and training of staff in our Customer Service and Billing areas needs to be completed.
- Other Regulatory requirements, including the implementation of new Customer Service Standards, the Ontario Clean Energy Benefit and new Billing Rates (effective May 1, 2011) have had an impact on THI's project schedule for transitioning to TOU.
- There are still a number of technology related issues to be resolved. Meter reading communications have improved significantly over the past few months but THI is still working towards achieving the required results. There are still a number of synchronization related issues, between our Customer Information System ("CIS") and the MDM/R to be resolved. All issues have been identified and our CIS Vendor ("Harris") is actively looking into them. Due to other technology related issues our customer web presentment tools are still being developed. It is our plan to have them developed and rolled out to customers at least two months prior to transitioning them to TOU.
- Customer Education is behind schedule as a result of the previous issues outlined above. Customer web presentment, along with informational meetings and materials are key components to customer education.

Conclusion

Tillsonburg Hydro Inc. is committed to the implementation of TOU pricing for Residential and General Service < 50 customers. The requested amendment from June 2011 to January 15, 2012 would provide adequate time for THI to prepare for a smoother transition to TOU billing for our customers.

Yours very truly,

A handwritten signature in black ink, appearing to be 'S.T. Lund', with a stylized flourish extending to the right.

S.T. Lund, P.Eng.
General Manager