



**West Coast Huron Energy Inc.**

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EB-2011-0241

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ONTARIO ENERGY BOARD

16/6/11  
Ontario Energy Board  
Attention: Kirsten Walli, Board Secretary  
2300 Yonge Street, 27<sup>th</sup> Floor  
P.O.Box 2319  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli,

**West Coast Huron Energy Inc. – OEB Licence ED-2002-0510  
Application for Exemption from Mandated Time-Of-Use Pricing Date  
Board File No. EB-2010-0218**

On August 4, 2010 the OEB issued a determination under Section 1.2.1 of the Standard Supply Service Code ( SSS Code) to mandate TOU pricing for regulated pricing plan ( RPP) consumers. The determination established the mandatory TOU implementation date of August 2011 for West Coast Huron Energy Inc. ( Goderich Hydro). This mandatory TOU date is the date on which the commodity pricing provisions of section 3.4 of the SSS Code becomes mandatory and all RPP customers will be billed for electricity consumption using TOU rates.

West Coast Huron Energy Inc. is hereby making application for an exemption from its mandated TOU pricing date of August 2011 to January 2012.

As of December 31, 2010, West Coast Huron Energy Inc. had installed all Smart Meters for residential and low volume general service consumers to meet the Minister of Energy's mandate. We started billing low volume customers using Smart Meter register reads in March 2011.

The following reasons are provided in support of our application to the Board:

Conversion from Harris Pubs 5.2.19 to Harris Northstar 6.3.1 is pending .

This conversion, once completed, will streamline the TOU billing procedures. West Coast Huron Energy Inc. considers it prudent to complete the CIS upgrade prior to implementing TOU billings. Past and current demands on limited staff resources have caused the postponement of this conversion. The current anticipated completion of the conversion is by the end of 2011.

Staff training

Training of staff related to new processes and billing systems has not been completed. West Coast Huron Energy Inc., as a result of being a small LDC with limited resources, hired an external company to complete the processes and testing toward TOU billing. Large volumes of workload for this company together with availability of our small staff, has delayed the required training.

Measurement Canada

During unit testing, it was identified by Measurement Canada that the requirement to show meter register readings at the start and end dates of each billing period is required for charging TOU rates. A working group of LDC's was established and it is our understanding that a potential solution has been accepted by Measurement Canada. The reconfiguration of the MDM/R and CIS systems to facilitate these changes is expected to be completed by January 2012.

Collective Agreement negotiations

The Collective Agreement expired on May 31, 2011. We are currently in negotiations and a strike situation would jeopardize the completion of any work. Therefore, West Coast Huron Energy Inc. considers it prudent to have a new contract in place prior to proceeding with TOU billing.

Therefore West Coast Huron Energy Inc. is making application to the Ontario Energy Board for an extension to the implementation of TOU rates until January 2012.

Please contact the undersigned with any questions regarding this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry J. McCabe", with a long horizontal flourish extending to the right.

Larry J. McCabe,  
President/Secretary