**Burlington Hydro Inc.**

**Response to Canadian Federation of Independent Business Interrogatories**

1. *Burlington Hydro states in it’s application that “significant customer distress” is expected on intorduction of TOU rates. What data is presently available to Burlington to assess the impact of the change on small commercial customers, if the customers are not able to make changes in the consumption levels or load shapes?*

Response: Local special interest groups within the Burlington community (such as, but not limited to) senior advocacy groups, low-income families and small business owners have become increasingly vocal about feeling victimized by TOU rates. With more education BHI feels that we may be able to alleviate the intensity of this reaction.

Although Burlington Hydro does not have any empirical data available to assess the impact of TOU rates on these groups, in sharing key learning’s with other LDC’s we understand that they are often negatively impacted.

1. *Burlington is requesting “a peroid of covering a number of billing cycles,” during which it plans to provide parallel billing information to customers. Is Burlington Hydro planning to collect the parallel billing information, either for all customers or for a sample, in order to determine the extent and distribution of bill impacts?*

Response: Burlington Hydro will make TOU consumption information available to all TOU customers on our Whitecap Portal – an extension of our current website. After registering (free of charge) all TOU customers will be able to compare and contrast their current RPP pricing with the proposed TOU rates and modify their consumption patterns accordingly.

1. *Please list and describe the measures that Burlington Hydro plans to take to assist customers generally, and small business customers specifically, during the postponement period, if approved by the Board.*

Response: The established communications plan, currently under way, covers a number of marketing and communication touch-points. The goal of our strategy is to deliver a consistent and customer friendly message while providing educational TOU management tools:

The following metrics have been based on a 6-month communication schedule:

* Reach - Customer Billing Inserts:
	+ 62,666 Customers billed at a read rate of 10% = 6,267
	+ 6,267 x 2 inserts
	+ **= 12,534**
* Reach – Appliance Clings:
	+ 62,666 Customers billed at an adoption rate of 10% = 6,267
	+ 6,267 x 2 clings
	+ **= 12,534**
* Projected Reach Radio:
	+ City population of 164,000 with a reach of 0.5% = 820
	+ 820 X 315 spots/week (over 9 weeks)
	+ **= 258,300**
* Projected Reach Community Out-Reach Team:
	+ 3 days/week @ 20 weeks
	+ Average reach of 1,000 customers/week
	+ **= 20,000 Customers**

* Projected Reach Customer & Small Business Education Sessions:
	+ Monthly sessions @ 1/month x6 months
	+ Average 90 customers/session
	+ **= 540 Customers**
* Projected Reach Newspaper:
	+ Weekly distribution of 60,000 with a reach of 4% = 2,400
	+ 2,400 x 1 article/week for 20 weeks
	+ **= 48,000**

Thus, Burlington Hydro will be able to penetrate the market with a controlled and customized message to our customer base over the six month extension period. With a total of **351,908** TOU educational impressions prior to introducing TOU rates.

1. *Is Burlington Hydro confident that customer bill impacts can be mitigated by the new proposed implementation date of January 1, 2012? Why, or why not?*

Response: Please see #3 above. Burlington Hydro is confident that the exposure to an additional 350,000+ targeted messages will help our customers to be more educated and better prepared to move onto TOU rates. Through better education and the adoption of TOU tools Burlington Hydro feels that we may be able to alleviate the impact.

1. *Has Burlington Hydro consulted with small business customers, or with organizations of small businesses in developing measures to reduce the negative impacts of time of use rates? If not, what is Burlington Hydro’s view of the potential value of such consultations?*

Response: To date Burlington Hydro has not consulted with any small businesses regarding TOU rates. However, we do recognize the potential value of such consultations. The concept of the Education Sessions would be to facilitate a dialogue between Burlington Hydro and our customers – aiming to help to reduce the potential negative impact of TOU rates for all of our customers.

1. *Is Burlington Hydro aware of any requirement of the Ontario Energy Board for LDC’s to compute and report customer bill impacts resulting from the implementation of TOU rates?*

Response: No, Burlington Hydro is not aware of any such requirement.