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June 30, 2011

Ms, Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor
P.O. Box 2319
TORONTO, ON M4P 1E4

Dear Ms. Walli:

Re: Ottawa River Power Corporation Application for an Extension of Mandated Time-of-Use Date

On August 4, 2010 the Ontario Energy Board (the "Board") issued a final determination under Section 1.2.1 of the Standard Supply Service Code to require the implementation of TOU pricing for Regulated Price Plan ("RPP") customers. The determination established mandatory TOU implementation dates for each electricity distributor. The date of October 2011 is the determined mandatory TOU date for Ottawa River Power Corporation ("ORPC").

In its August 24, 2010 letter, the Board acknowledged that distributors may encounter extraordinary and unanticipated circumstances during the implementation of TOU pricing and impact on the distributor's mandatory TOU date and whether any adjustment in that date may be warranted. While Ottawa River Power has made significant progress in meeting this mandatory date, there remain a few issues that have led to delays in the corporation's TOU implementation schedule. Therefore ORPC respectfully requests an extension of mandated Time-of-Use pricing until January 2012.

Ottawa River Power Corporation has presently deployed 100% of all residential RPP customers and approximately 90% of remaining RPP customers for total deployment of 98.5%. The remaining small commercial customers have not been completed due to access difficulties; however, ORPC anticipates that this will be completed by the end of August 2011. To date, ORPC has completed AMCC Internal Testing, CIS Internal Testing, MDM/R Registration and the completion of the Self Certification for Enrolment Testing. As well, ORPC has finished System Integration Testing (SIT) in early June and has just completed Qualification Testing (QT). In order to be successful in implementing TOU pricing the following three items should be completed prior to Self Certification - Cutover:

1. Customer Transition to TOU Rates

While Ottawa River Power Corporation has been preparing its customers for the introduction of TOU rates through published information and bills inserts, significant customer distress is expected when customers are suddenly faced with larger bills resulting, in part, from their lack of experience in managing electricity consumption in a TOU environment. A period covering a number of billing cycles is essential to enable ORPC to work with its customers to adapt to the new billing reality. ORPC plans to provide parallel billing information to its customers so they can modify their pattern of energy usage and thus mitigate the impact of potential bill increases.

2. Upgrade of the AMI System

Ottawa River Power Corporation uses the Elster AMI system to collect the customers' TOU energy usage data and deliver it to the IESO for central processing. Currently ORPC is using version 6.2, but must upgrade to version 7.5 to meet the requirement of Measurement Canada. This upgrade is planned for the summer period (July/August 2011). Ottawa River Power Corporation is carrying out the IESO implementation with Renfrew Hydro, Hydro 2000 and Cooperative Embrun. Therefore, version 7.5 conversion has to be coordinated with the other utilities' SIT and QT testing. When they have completed testing the conversion of the AMI system can be undertaken and then the system must be extensively tested before full implementation of TOU pricing.

3. Upgrade of the IESO System

Ottawa River Power Corporation will also have to re-complete SIT testing and QT testing after the IESO completes their system upgrade to version 7.2 that is expected in November 2011.

For these reasons, Ottawa River Power Corporation respectfully requests that the Board grant approval for a revised mandatory TOU implementation end-date of January 2012. This will have no material impact on the costs of ORPC's smart meter and TOU implementation plan.

Yours Truly,



Douglas Fee
President & C.E.O.