

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O.Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

RE: West Coast Huron Energy Inc. – Extension to Mandated Time-Of-Use

Pricing Date for Regulated Price Plan Consumers

Board File No. EB-2011-0241

The following are the responses of West Coast Huron Energy Inc. to the Board Staff questions posed in correspondence dated July 26, 2011:

West Coast Huron Energy acknowledges and regrets the late submission of this response. The due date was August 2, 2011. Due to vacation schedules in the busy summer months, we were not able to complete the response until August 5, 2011. Accordingly, we are requesting that the dates for each subsequent submission be delayed by one week.

- a) *Please explain in detail why West Coast Huron did not raise any of the concerns stated in its application in its previous monthly reports.*

The monthly reports reflected the progress of the actual production. WCHE did not recognize areas on the monthly report that addressed other areas of concerns similar to those that are stated in our application to extend the mandatory TOU date. In general terms, West Coast Huron Energy Inc. remained focused on the production piece and have been diligent in attempts to get the required staff training completed in order to meet our target date. Staff training was delayed on a number of occasions to ensure that the production piece was completed on time.

WCHE completed the monthly reports, providing the requested information, to the best of our ability given the information available at the time.

- b) *Given that West Coast Huron transitioned to production in March 2011 and the state of its smart meter registrations with the MDM/R, please explain in detail what has led to the postponement of conversion from Harris Pubs 5.2.19 to Harris Northstar 6.3.1, including copies of documentation (e.g., briefing notes/reports/etc.) of when this issue was identified as a concern with respect to TOU implementation.*

The conversion will be lead by an outside service provider. Significant workloads, for both normal day to day operations plus installation of smart meters and the preparation for TOU has left all staff resources (both in and out of house) maxed out and unable to complete the required work and complete it to a standard that produces accurate billings and minimizes confusion to the customer. The service provider for West Coast Huron Energy Inc. services a number of other utilities. As a result, the conversion is dependent on the time and resources of the service provider to proceed with the conversion for not only West Coast Huron Energy Inc., but other utilities as well. West Coast Huron Energy Inc. considers it best to do the successful conversion from Harris Pubs 5.2.19 to Harris Northstar 6.3.1 first prior to proceeding with TOU. The conversion must be done due to the fact that Harris is not going to continue to support the 5.2.19 version. We have been aware of the required conversion and it has been an on-going concern. Unresolved technical issues with Northstar 6.3.1 had prevented the initial conversion and since those issues have been resolved, it has been a matter of lack of staff resources, time and training.

- c) *Given that West Coast Huron transitioned to production in March 2011 and the state of its smart meter registrations with the MDM/R, please explain in detail why the postponement of conversion from Harris Pubs 5.2.19 to Harris Northstar 6.3.1 represents extraordinary and unanticipated circumstances related to the implementation of TOU billing.*

When the conversion happens, it will take staff resources away from normal day to day operations including the implementation of TOU billing.

- d) *Given that West Coast Huron transitioned to production in March 2011 and the state of its smart meter registrations with the MDM/R, please explain in detail why it has failed to complete staff training related to new processes and billing systems, including copies of documentation (e.g., briefing notes/reports/etc.) of when this issue was identified as a concern with respect to TOU implementation.*

The issue was formally documented in correspondence dated June 16, 2011 by way of an application to extend the mandated time of use date. The explanation as to why there was failure to complete the staff training is provided in answer (b) above.

- e) *Given that West Coast Huron transitioned to production in March 2011 and the state of its smart meter registrations with the MDM/R, please explain in detail why the failure to complete staff training related to new processes and billing systems represents extraordinary and unanticipated circumstances related to the implementation of TOU billing.*

Without staff training, WCHE is unable to provide accurate processing and good customer service.

- f) *Given that West Coast Huron transitioned to production in March 2011 and the state of its smart meter registrations, please explain in detail why Measurement Canada requirements to show meter register readings at the start and end dates of each billing period represents extraordinary and unanticipated circumstances related to the implementation of TOU billing.*

WCHE understanding is that this issue is soon to be corrected by the MDM/R.

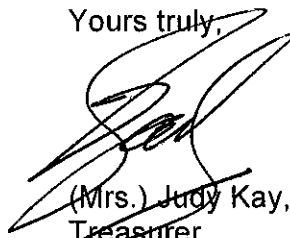
WCHE is hesitant to produce billings to customers that do not provide start and end meter readings, as mandated by Measurement Canada. Our customers are presently provided with start and end meter readings and it will be less confusing to the customer to have consistent information on billings.

Since the MDM/R, seemingly, will soon have this issue rectified WCHE considers it prudent to wait for the completion of the correction.

- g) *Please describe the current status of West Coast Huron's collective agreement negotiations.*

On-going negotiations with the union are providing an indication that the company is close to settlement and anticipate an agreement to be in place by late August 2011.

Yours truly,



(Mrs.) Judy Kay,
Treasurer

West Coast Huron Energy Inc.