
August 9, 2011

BY COURIER & RESS

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

Re: Board File No. EB-2011-0239
Kitchener-Wilmot Hydro Inc. – TOU Extension for Certain RPP Customers

Dear Ms. Walli:

On June 14, 2011, Kitchener-Wilmot Hydro Inc. (KWHI) filed its Application for an Extension to Mandated Time-of-Use Pricing Date for Certain RPP customers. The Board issued a Notice of Application and Hearing on June 27, 2011. Board staff filed Interrogatories to the Applicant on the Application on July 18, 2011. KWHI responded to these Interrogatories on July 22, 2011. On August 2, 2011 Board Staff issued its Submission to the Board stating:

“Staff submits that an extension should be granted for only those GS<50 kW customers with meters with improper time-alignment of the consumption intervals. Staff submits that customers with functioning meters not requiring firmware upgrades should be placed on TOU pricing without further delay.”

KWHI submits that an extension is required for all GS<50 kW as the original mandated June determination date has already passed. KWHI's Residential customers were converted to TOU Pricing in accordance with the original implementation schedule. As part of its Customer TOU Education Program, customers were informed through billing inserts that TOU pricing was soon to be implemented and that they would be notified by letter well in advance of the date that TOU pricing would commence. This process was completed for all Residential customers, by billing cycle, approximately one (1) month in advance of the respective TOU billing periods. Customer notification for all GS<50 kW customers is still outstanding and must be considered when establishing TOU billing dates for the GS<50 kW customer classification in its entirety or in part.

KWHI had planned to commence notification of the GS<50 kW Customers on a per cycle basis beginning in late December 2011, which would be well in advance of the requested extension date of January 31, 2012. If it is the Board's direction that "*GS<50 kW Customers with functioning meters not requiring firmware upgrades should be placed on TOU pricing without further delay*", then KWHI submits that an extension date of October 1, 2011 be granted for this sub-group of the GS<50 kW customer classification in order to provide these customers with the appropriate notification. Customers within this sub-group would be placed on TOU pricing in accordance with their regular billing cycles. At this time, KWHI is not able to provide a proposed TOU billing implementation schedule for this sub-group of GS<50 kW customers as minor modifications are required to its Customer Information System (CIS) in order to separate the rate class by meter type. These CIS modifications are also required in order to comply with the Board staff recommendation but the work is expected to be minor and can be accommodated in order to begin the customer notifications in September 2011, if required.

KWHI maintains that it would be its preference to convert all GS<50 kW customers to TOU pricing on the same schedule, with an implementation commencement date of January 31, 2012. KWHI is; however, able to comply with an earlier implementation commencement date for GS<50 kW customers not affected by the technical issue if this is the Board's direction. Further to this, KWHI has proposed an October 1, 2011 implementation commencement date in order to undertake the appropriate customer notification.

Kindly contact the undersigned should you require any further information.

Sincerely,

Original Signed by

Wilfred Meston, P. Eng.
Vice-President Operations

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