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WATERLOO NORTH HYDRO INC.

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VIA RESS and Courier

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms Walli:

**Re: Waterloo North Hydro Inc.
Application for an Extension to Mandated Time-of-Use Pricing Date for its
General Service < 50 kW RPP Customers**

Waterloo North Hydro Inc. (WNH) submits this letter in response to Board Staff Submission dated August 9, 2011 with regards to WNH's Application for an Extension to Mandated Time-of-Use Pricing Date for its General Service < 50 kW RP Customers.

In its report, Board Staff stated:

"Staff submits that an extension should be granted for only those 2,957 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."

WNH respectfully does not concur with this recommendation. WNH still maintains that a rollout of TOU pricing to only a portion of this class of customers may produce an unfair competitive advantage or disadvantage to individual customers. There are customers in this rate class that may have competing businesses and that equitable treatment may not be applied if some of these GS < 50 RPP businesses are billed on TOU pricing and the other businesses are billed on Regulated Price Plan pricing.

We trust that the Board will act in the best interests of these customers and approve this adjustment to WNH's mandatory TOU pricing date for all its General Service < 50 kW RPP customers from June 2011 to January 31, 2012.

As per the schedule outlined in the Notice of Application, submissions were due on August 17, 2011. Unfortunately, due to planned vacations, key staff were not available to respond to this matter. We respectfully request that the Board consider this submission in their deliberations.

If there are any questions, please contact me at 519-888-5542, asingh@wnhydro.com or Chris Amos at 519-888-5541, camos@wnhydro.com.

Yours truly,

Original Signed By

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