

September 29, 2011

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

Dear Kirsten:

Ref: West Coast Huron Energy Inc.- Extension to Mandated Time of Use Board File No: EB-2011-0241

Please accept this letter as our official reply to the Board's August 9th, 2011 letter. Staff raised some valid points in their response to our initial request for an extension until January 1, 2012 and we understand their initial concerns. We agree that it is possible to proceed with the TOU implementation prior to our conversion to Harris Northstar 6.3.1 and thus have pushed the date for our conversion to April 30, 2012. We still feel that the Measurement Canada requirement implementation prior to our going live to TOU would be less confusing to the customer and could reduce the number of questions to our staff but as pointed out by the Board this is more of a discretionary choice in hopes of reducing call overload to our small office staff.

- We still do not have a signed agreement with our union staff which have been working without a contract since June 1, 2011 and this continues to be an ongoing concern to staffing during the transition to TOU. It is anticipated that this situation will be resolved in the near future.
- We have diligently worked toward getting our staff trained for the TOU implementation and two staff were able to attend a one day training session on August 17, 2011 in the hopes that they would be able to proceed with training of our remaining staff but due to our Town being struck by a F3 Tornado on August 21, 2011, this training has not been possible.
- The ongoing cleanup from the tornado, which will take us an additional couple of months at least, has removed the possibility of getting staff both trained and familiar with the new process. Having talked to other LDC's, who have implemented their TOU bills, the TOU billing will place an additional burden on our customer service staff who are over extended with the fallout from the tornado in handling customer queries and manually doing many processes due

to the destruction of operation's computer equipment when their building was completely destroyed.

- Many of our smart meters were destroyed and our collectors required attention so that they could once again receive data from the meters. We fear that there may be metering equipment that may have been compromised but has not to this point come to light. Due to these concerns, we feel it would be prudent for us to verify that we are able to get our correct reads and produce accurate billing prior to moving to TOU. Operations have been very thankful to have the assistance of crews from other utilities to aid in dealing with the destruction in the immediate aftermath and continuing weeks that followed but directing these crews as well as spending long hours repairing damage have left little time for inventory issues and other day to day paper work which now requires attention.
- The office staff were unable to access their work stations for several days after the event due to gas leaks and safety issues which has created a back log for their department as well. Large volumes of work orders, customer inquiries and complaints and extensive locating have compounded the increase in work load for all employees.

Having said this we understand that TOU must be implemented but feel the utility would be better prepared to move forward at a later date and we would propose to the Board that the January 2012 usage which would be billed in February 2012 would give the utility staff time to deal with the tornado fallout and get our staff trained and equipment replaced to move forward with TOU billing.

Respectfully submitted on behalf of West Coast Huron Energy Inc. (Goderich Hydro),

Yours truly,



Larry J. McCabe
President

LJM/afI