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September 30, 2011

via RESS – original to follow by mail

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Request for Temporary Exemption from Certain Sections of the Distribution System Code and the Retail Settlement Code
Board File Number #EB-2011-0269**

I write in response to the Board's letter dated August 16, 2011, which requires that THESL confirm by September 30, 2011, the date by which THESL better expects to be fully compliant with the subject provisions of the Codes.

THESL's new Customer Information System (CIS) has been live since July 07, 2011 and THESL has successfully been billing customers on schedule and without any major occurrences related to batch production, customer relations issues, or retailer concerns. Nonetheless, the past several months have been extremely challenging. THESL Customer Care and Information Technology management and front-line staff have been working many evenings and weekends to handle the normal and expected CIS transition-related back logs and conversion-related retailer transactions. These same management and front-line staff are also charged with other, customer service-related administrative duties, including training staff on the handling of the Ontario Clean Energy Benefit self-declaration form requests; and completing and testing of the OCEB report requirements and the manual work-around(s) related to the new customer service, collection and LEAP regulatory requirements.

THESL also has been incurring higher call volumes as a result of recent rate changes, the OCEB credit, and expected data conversion issues related to THESL's legacy CIS historical data and the CC&B new account number format.

The activities described above have competed with THESL's ability to finalize until recently, the defining of the complex requirements associated with the regulatory customer service, collections and LEAP requirements that THESL's CIS vendor will use to develop code. However, THESL has now received an estimate from its vendor of a 58-week work effort (8,400 hours) to develop code; this will extend THESL's compliance date for full completion from the initial estimated date of June 24, 2012, to December 17, 2012.

Accordingly, at this time, THESL seeks a temporary exemption until December 17, 2012, from the stated customer service provisions of the Codes.

To accelerate the end date for full compliance and cessation of the temporary exemption, THESL has made, and will continue to make, best efforts to manually complete work within the new regulatory customer service, collection and LEAP requirements. THESL also intends to prioritize any CIS system configuration changes to CC&B to allow for automated changes that can be initialized early in 2012. In addition, THESL will request that its CIS vendor deliver code in a phased approach in Q2, Q3, and Q4 2012, to allow THESL to test and implement the system code changes in a gradual and controlled manner.

Yours truly,

[original signed by]

Glen A. Winn
Manager
Regulatory Applications & Compliance

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