Ontario Energy Board

Commission de l'énergie de l'Ontario

Ontario

EB-2011-0128

IN THE MATTER OF the *Ontario Energy Board Act, 1998,* S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an application by PowerStream Inc. for an order or orders approving or fixing a just and reasonable distribution rates related to Smart Meter deployment, to be effective November 1, 2011.

BEFORE: Cynthia Chaplin
Vice Chair and Presiding Member

Ken Quesnelle
Panel Member

DECISION AND ORDER
(Original November 21, 2011, as corrected December 9, 2011)

PowerStream Inc. ("PowerStream") filed an application with the Ontario Energy Board (the "Board") on June 24, 2011 under section 78 of the *Ontario Energy Board Act*, *1998*, S.O. 1998, c. 15, (Schedule B) (the "Act"), seeking final approval for smart meter related costs to the end of April 30, 2011 and other going forward costs.

THE APPLICATION

PowerStream operates two separate rate zones, PowerStream South, (the "legacy service area") and PowerStream North, the Barrie service area. This application pertains to both service areas. The Board assigned the application file number EB-2011-0128.

The Board issued a Notice of Application and Hearing on July 14, 2011. The Vulnerable Energy Consumers Coalition ("VECC") was the only party that sought intervenor status and cost award eligibility. The Board approved VECC as an intervenor and awarded VECC cost eligibility status. Veridian Connections Inc. applied for and was granted observer status.

The Board issued Procedural Order No. 1 on July 14, 2011, which invited submissions on certain evidence for which PowerStream had requested confidential treatment. No submissions were received. The Board issued a Decision on Confideniality on August 17, 2011 approving PowerStream's request to retain the subject information in confidence. In accordance with Procedural Order No. 1, Board staff filed interrogatories ("IRs") on August 17, 2011. VECC filed IRs on August 22, 2011. PowerStream filed its responses on September 9, 2011.

The Board issued Procedural Order No. 2 on September 27, 2011, pursuant to which Board staff filed a submission on October 7, 2011, VECC filed a submission on October 14, 2011 and PowerStream filed its reply submission on October 21, 2011.

The Issues

The following are the key issues raised in the submissions by Board staff and VECC and addressed in this Decision:

- Prudence of documented costs for installed smart meters;
- Inclusion of unaudited actual costs;
- Forecasted costs and the date of disposition;
- Cost allocation methodology; and
- Carrying Charges on OM&A and Amortization.

Prudence of documented costs for installed smart meters

PowerStream seeks recovery of costs associated with 21,725 meters installed in its South rate zone between January 1, 2010 and April 30, 2011 and for 69,393 smart meters installed in its North rate zone from program inception (2006) through April 30, 2011. The costs documented in the Application represent capital costs of approximately $11.2 million in the South rate zone and $11 million in the North rate zone.

PowerStream proposes to recover these costs through two rate riders: (i) a Smart Meter Disposition Rate Rider (“SMDR”) and (ii) a Smart Meter Incremental Revenue Requirement Rate Rider (“SMIRR”). The SMDR will recover the difference between the deferred revenue requirement for the installed meters up to the date of disposition and the Smart Meter Funding Adder revenues collected, to date. The SMIRR is designed to recover the annualized incremental revenue requirement for the capital and operating expenses for the installed smart meters going forward. The total amounts proposed for recovery through the SMDR and SMIRR in each rate zone are shown in Table 1.

Table 1 - Total proposed amounts to be recovered from the two riders

Rate zone	SMDR	SMIRR
North	$262,115	$1,724,725
South	$(2,091,164)	$1,342,328

This is the third application filed by PowerStream for a final prudence review of a component of its smart meter deployment program. In 2008, PowerStream received approval for its smart meter costs incurred to December 31, 2007 for its South rate zone as part of a Board-approved settlement agreement (EB-2008-0244). In 2010, PowerStream filed a stand-alone application (EB-2010-0209), in which the Board approved costs incurred in the deployment of 137,356 smart meters in the South rate zone between January 1, 2008 and December 31, 2009. The North rate zone was not part of either of the two previous applications.

PowerStream’s audited actual costs showed an average capital cost of $137.43 per meter for meters installed between January 1, 2008 and December 31, 2009, in the South rate zone (EB-2010-0209). PowerStream’s documented costs in this application, summarized in Table 2, showed an overall increase in average cost per meter from prior Board approved costs.

Table 2 - Summary of average capital costs per meter installed (includes meter and other capital costs).

Rate Zone	Residential		GS < 50 kW		Total	
	$/meter	# of meters	$/meter	# of meters	$/meter	# of meters
North	$130.51	64,199	$514.24	5,194	$159.24	69,393
South	$311.04	4,470	$570.38	17,255	$517.02	21,725

PowerStream explained that this increase was mainly the result of the mix of meter types covered by the current application. Powerstream stated that, in the South rate zone, the majority of meters installed were non-standard (i.e. 3-phase, network, etc.) meters. The break-down of installed costs per meter type in each rate zone are summarized in Table 3. The average meter costs for standard residential and GS<50 kW meters documented in this application decreased over prior Board approved costs.

Table 3 - Average installed cost per meter (meter installation costs only)

Rate Zone:	**North**			**South**		
Class/Type	**Quantity**	**Installed Cost**	**Cost per meter**	**Quantity**	**Installed Cost**	**Cost per meter**
Residential						
Standard	62,621	$ 6,363,107	$ 101.61	255	$ 25,833	$101.31
400 Amps	518	$ 138,533	$ 267.44	1,020	$271,570	$ 266.25
Network	1,060	$ 295,486	$278.76	3,195	$866,261	$277.34
Total	**64,199**	**$ 6,797,126**	**$ 105.88**	**4,470**	**$ 1,183,664**	**$264.80**
GS<50 kW						
Single Phase	1,429	$ 309,812	$ 216.80	3,081	$ 624,326	$ 202.64
3-phase 120-480V	3,476	$ 1,964,436	$565.14	12,936	$ 7,267,208	$ 561.78
3-phase 600 Volt	289	$ 268,742	$929.90	1,238	$ 1,152,439	$ 930.89
Total	**5,194**	**$ 2,542,990**	**$ 489.60**	**17,255**	**$ 9,043,973**	**$524.14**
TOTAL	**69,393**	**$9,340,116**	**$ 134.60**	**21,725**	**$10,227,637**	**$ 470.78**

PowerStream also noted that following Measurement Canada's approval of a second supplier for 3-phase smart meters, the company was able to secure more favourable pricing for 3-phase smart meters in the fall of 2010. This resulted in a decrease in the average total capital cost per meter from $682.56 to $570.38[1] for GS < 50 kW customers in the South rate zone.

Neither Board staff nor VECC raised any issues with respect to the prudence of the costs documented by PowerStream in the Application.

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[1] Application (EB-2011-0128), page 30, June 24, 2011.

Board Findings

In the Board's prior two decisions on PowerStream's smart meter costs the Board has found the costs to have been prudently incurred. PowerStream has continued with its procurement practices. The company has also demonstrated its market monitoring efforts by securing more favourable pricing as new suppliers became available through Measurement Canada's approval process. No issues have been raised by any of the parties in respect of these costs. The Board finds the audited costs documented in the application to have been prudently incurred.

Inclusion of Unaudited Actual Costs

In its application, PowerStream also provided unaudited actual costs for the period between January 1, 2011 and April 30, 2011, for both rate zones. Board staff took no issue with the nature and quantum of these unaudited actual costs. Staff noted that the unaudited actual costs were comparable to the documented audited actuals and compared favourably to costs approved in PowerStream's prior applications before the Board.

The Notes tab of version 2.0 of the Board's Smart Meter Model states that[2]:

> The Board expects that the majority (i.e. 90% or more) of costs for which the distributor is seeking recovery will be audited. In all cases, the Board expects that the distributor will document and explain any differences between unaudited or forecasted amounts and audited costs.

Board staff noted that the unaudited costs represent more than 10% of the costs documented in the application, but submitted that the unaudited costs represent approximately 10% of the total costs incurred by PowerStream over its smart meter roll out. Board staff submitted that the correct interpretation of the 10% threshold was as a proportion of the overall smart meter deployment costs from program inception to the date of disposition.

VECC noted that 12.36% of costs in the North rate zone and 46.96% of the costs in South rate zone were unaudited in this application. VECC disagreed with Board staff's

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[2] The Board issued this Smart Meter Model, an Excel spreadsheet, to electricity distributors under covering letter on September 13, 2011.

position that the 10% threshold should be applied to the total costs incurred in the smart meter implementation, across all applications. VECC submitted that the 10% threshold should only apply to the current costs that a distributor is seeking to recover.

PowerStream agreed with Board Staff's interpretation of the threshold for unaudited costs. PowerStream also noted that VECC raised no other concerns with the documented costs other than the fact that they are unaudited.

Table 4, below, shows a detailed summary of the costs incurred by PowerStream in their smart meter implementation, across all applications. In its submission, Board staff estimated that approximately 10% of the overall costs incurred in PowerStream's smart meter implementation were unaudited as presented in this application. The more detailed calculation below shows that the actual unaudited costs for both rate zones in this application as a percent of total costs to date is approximately 12%.

Table 4 - Summary of PowerStream's overall smart meter spending

	North Rate Zone	**South Rate Zone**	**Total**
Capital Costs			
Board approved Capital additions			
EB-2008-0244	$0	$10,121,905	$10,121,905
EB-2010-0128	$0	$18,876,357	$18,876,357
EB-2011-0128 Documented Costs			
Audited	$9,999,761	$6,023,222	$16,022,983
Unaudited actual	$1,050,096	$5,209,014	$6,259,110
OM&A			
Board approved OM&A			
EB-2008-0244 approved costs	$0	$190,519	$190,519
EB-2010-0128 approved costs	$0	$2,225,937	$2,225,937
EB-2011-0128 Documented Costs			
Audited OM&A	$332,553	$556,953	$889,506

Actual Unaudited OM&A	$148,347	$166,110	$314,457
Projected OM&A (May 1 to December 31, 2011)	$258,765	$451,157	$709,922
Total costs to date (including EB-2011-0209)[3]	**$11,530,757**	**$43,370,017**	**$54,900,774**
Total actual costs in EB-2011-0128	**$10,332,314**	**$6,580,175**	**$16,912,489**
Total unaudited costs in EB-2011-0128[3]	**$1,198,443**	**$5,375,124**	**$6,573,567**
Unaudited costs, as % of total program costs to date	**10%**	**12%**	**12%**
Unaudited costs, as % of costs included in EB-2011-0128	**10%**	**45%**	**28%**

Board Findings

The Board finds the unaudited actual costs documented by PowerStream in the application to be appropriate for recovery. Though PowerStream's documented unaudited costs exceed 10% of total program costs to date by a modest amount, the Board does not believe that the level of unaudited costs in this application is high enough to warrant the additional expense and delay associated with an additional proceeding. The Board notes that no concerns were raised with the unaudited costs, nor were any issues raised with respect to the nature of the costs incurred by PowerStream. On the contrary, Board staff noted that the nature, type and quanta of costs incurred during the unaudited period were consistent with the audited costs in this application. The Board also notes that no costs have been disallowed in prior PowerStream smart meter proceedings covering the South Rate zone, and the Board has considered this fact in reaching its conclusion that it is reasonable in the current circumstances to accept a larger proportion of unaudited costs. With respect to the North Rate zone, the area which has not been reviewed in the past by the Board, the unaudited costs are only 10% of the total costs to date (and of the current application).

[3] Does not include forecasted OM&A.

The establishment of the 10% threshold provides the ability to assess the reasonableness of a relatively small percentage of yet to be audited costs in comparison to a much larger percentage of audited costs. The fact that some of those costs have been dealt with in prior applications does not diminish their value in terms of comparability to the subsequently incurred costs found in this application. The Board agrees with Board staff's position that the 10% threshold for unaudited costs in each application should apply to the total costs incurred to date in the smart meter deployment program at the time of the application.

Forecasted Costs and the Date of Disposition

PowerStream seeks final recovery of costs incurred in the installation of smart meters up to April 30, 2011. These costs include $500,000 of forecast one-time OM&A costs for anticipated repairs to customer-owned equipment for 225 meters not yet installed as of April 30, 2011. These one-time expenses were included for recovery in the Smart Meter Disposition Rate Rider ("SMDR") calculation but were for activities anticipated to take place after the date of disposition. PowerStream indicated that it had 3141 meter installations remaining for the 2011 calendar year.

Board staff submitted that PowerStream's application is inconsistent with Board policy in two ways: (i) capital and OM&A costs are not aligned with respect to date of disposition; and (ii) the claim that the application be treated as the final disposition of smart meter costs when PowerStream plans to add the remaining meters, yet to be installed, as capital additions in its next cost of service application. Board staff submitted that PowerStream should be consistent with the alignment of dates for all costs presented in the application. Board staff suggested that PowerStream elect to either:

a) Treat this application as a stand-alone smart meter cost recovery application to dispose of costs up to April 30, 2011. This would require the removal of all forecasted expenses for meters installed beyond April 30, 2011 from the SMDR and SMIRR calculations; or
b) Treat this application as the final disposition of costs. In this case, PowerStream would forecast the costs of installing the remaining meters through to December 31, 2011 for inclusion in the SMDR and update the SMIRR calculation to account for the ongoing revenue requirement of all meters (both forecasted and installed).

Board staff submitted that if PowerStream expected any material differences in the costs per meter or in the overall installation costs of the remaining smart meters, the company should seek to recover only costs for meters installed up to April 30, 2011.

VECC submitted that this application should be treated as a stand-alone smart meter cost recovery application, and not the final disposition of smart meter costs, because the level of unaudited costs is significant. VECC suggested that the Board only allow recovery of audited costs and that December 31, 2010 be used as the date of disposition.

PowerStream responded that April 30, 2011 should be used as the date of final disposition. PowerStream noted that as of April 30, 2011 it had installed over 100% of the required smart meters based on the mandated number of customers at the start of the smart meter implementation program. PowerStream noted that it adds approximately 5,000 to 6,000 new residential and GS < 50 kW customers per year and that, as a practical matter, it is necessary to establish a cut-off point where smart meter implementation is deemed complete and all further additions are part of the distributor's normal business activities.

As there is limited evidence on the record regarding the level of costs for repair work to customer owned property, Board staff submitted that PowerStream should continue to track the $500,000 in forecasted one-time repair costs in account 1556 for a future true up with rate payers, in the event that the Board approves the inclusion of these costs in the amounts to be disposed as part of this application. PowerStream agreed with Board staff's suggestion noting that it had primarily included the one-time expenses as part of the SMDR calculation due to concern over the availability of account 1556 as a means of tracking costs following final disposition.

Board Findings

The Board finds that April 30, 2011 is the appropriate date for the disposition of costs and directs that all forecasted costs associated with the installation of meters after that date be removed from the SMDR and SMIRR calculations. The Board agrees with PowerStream that, as a practical matter, a cut-off date must be selected for smart meter deployment, and the Board will consider this application to be PowerStream's final disposition of costs for smart meter deployment with the exception of the $500,000 in forecast repair and maintenance expenses which the Board expects will continue to be tracked in account 1556 and included in PowerStream's rebasing application expected in 2012 for 2013 rates. The Board provided its expectations with respect to the accounting of costs associated with this particular type of activity in its decision with reasons on the combined smart metering proceeding (EB-2007-0063).[4]

Cost Allocation Methodology

In PowerStream's prior application for smart meter cost recovery (EB-2010-0209), the Board made the following determination:

> The Board finds that a cost allocation approach based on class specific revenue requirement calculations offset by class specific smart meter funding to be inconsistent with previous Board decisions, and that there has been no clear requirement to track costs by class. The Board notes that historical funding collected from customer classes other than Residential and GS<50 kW is not material. The Board finds that a class specific calculation of the residual amounts for disposition of smart meter costs for each rate class is unwarranted, as there is insufficient benefit given the additional complexity.
>
> The Board also finds the cost allocation approach submitted by Board staff and accepted by PowerStream to be reasonable. In making this finding the Board is mindful that full cost causality should be the guiding principle. However, the Board accepts the argument advanced by PowerStream in its reply submission that VECC's proposal for full cost causality would result in significant directional swings for customers in the future. This volatility should be generally avoided.

In the current application, PowerStream allocated the revenue requirement as follows:

- Return (deemed interest plus return on equity) and Amortization have been allocated between the customer classes based on the capital costs of the meters installed for each class.
- OM&A has been allocated based on the number of meters installed for each class.

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[4] Decision with Reasons (EB-2007-0063), Replacement and Repair Costs, page 17, August 8, 2007.

- PILs have been allocated based on the revenue requirement allocated to each class before PILs.

Board staff submitted that PowerStream had correctly applied the cost allocation methodology approved by the Board in EB-2010-0209 and that a change in cost allocation methodology was not warranted at this time.

As part of their IRs, VECC requested PowerStream to complete a separate smart meter revenue requirement model for the residential and GS < 50 kW customer classes in each rate zone and to recalculate the SMDR, SMIRR and bill impacts using the class specific revenue requirements.[5] Table 5 and Table 6, below, compare the recalculated SMDRs for the North and South rate zone, respectively, to the original calculations provided by PowerStream in the application. A summary of the updated bill impact calculations is reproduced in Table 7. The net result is a shift in costs from the residential to the GS<50 kW customer class.

Table 5 - True-up Allocation and SMDR Calculation (North rate zone)[6]

Per Application				VECC 3(a)	
Customer Class	**Number of Customers**	**True-up Allocation**	**Monthly Charge**	**True-up Allocation**	**Monthly Charge**
Residential	64,830	$ 201,871	$ 0.52	$ 76,930	$ 0.20
GS<50 kW	5,886	$ 60,245	$ 1.71	$ 228,296	$ 6.46
Total	**70,716**	**$ 262,116**		**$ 305,226**	

Table 6 - True-up Allocation and SMDR Calculation (South rate zone)[7]

Per Application				VECC 4(a)	
Customer Class	**Number of Customers**	**True-up Allocation**	**Monthly Charge**	**True-up Allocation**	**Monthly Charge**
Residential	226,121	$ (258,936)	$ (0.19)	$(3,471,650)	$ (2.56)
GS<50 kW	24,190	$(1,832,228)	$ (12.62)	$ 1,486,286	$ 10.24
Total	**250,311**	**$(2,091,164)**		**$(1,985,364)**	

[5] Responses to VECC IRs (EB-2011-0128), IRs 3, 4 and 5, September 9, 2011.
[6] Ibid, Table VECC 3-2, page 7.
[7] Ibid, Table VECC 4-2, page 9.

Table 7 - Bill Impact Summary of Proposed Cost Allocation Methodologies for each rate zone[8]

	Per Application				Per VECC IR# 5			
	Residential		GS< 50		Residential		GS< 50	
	$	%	$	%	$	%	$	%
PowerStream South	$ (0.13)	(0.1)%	$(8.72)	(3.4)%	$ (2.46)	(2.4)%	$ 13.84	5.5%
PowerStream North	$ 2.27	2.0%	$ 7.44	2.8%	$ 2.01	1.8%	$ 11.38	4.4%

VECC submitted that the differences between the two cost allocation methodologies were significant and that full cost causality should be the guiding principle. VECC submitted that smart meter cost recovery should be done by a class specific rate rider to reflect the costs for each customer class. VECC also submitted that a separate model should be completed for the GS > 50 kW customer class and that any funds collected from customers of that class be returned, with carrying charges, to those customers. Board staff submitted that the calculations shown in PowerStream's responses to VECC IRs 3, 4 and 5 mirror the methodology that the Board determined was unwarranted in the EB-2010-0209 proceeding.

PowerStream did not submit any objections to the methodology proposed by VECC. PowerStream submitted that, should the Board approve VECC's approach, it would require direction from the Board regarding the treatment of smart meter funding adder amounts collected from the GS > 50 kW and Large Use customer classes.

Board Findings

In PowerStream's prior application the Board did not approve VECC's cost allocation approach, in part because the differences between the two approaches were not significant enough to warrant the additional complexity. This is not the case in this application as the differences here are significant. The Board finds that PowerStream should adopt the cost allocation methodology proposed by VECC. The Board notes that VECC's proposal may not be appropriate or feasible for all distributors as the necessary data may not be readily available. Since PowerStream has the necessary data, has provided the calculation and did not object to this approach, the Board concludes a change in cost allocation methodology is appropriate for this application.

The Board directs PowerStream to allocate the smart meter adder amounts collected from the GS > 50 kW and Large Use customer classes evenly to the residential and GS

[8] Ibid, Table VECC 5-5, page 11.

< 50 kW classes when calculating the true-up for the SMDR. The Board concludes this approach is appropriate because the amounts involved are not significant enough to warrant a more precise allocation. To be clear, PowerStream should reduce the class specific revenue requirements for each subject class by the amount of the class-specific revenues that have been collected through the adder, plus the additional revenues allocated to each of the subject classes from the non-participating classes.

Carrying Charges on OM&A and Amortization

The Board notes that PowerStream has not requested recovery of carrying charges on OM&A and amortization expense for its historical costs. Given that carrying charges have been applied by PowerStream to the revenues collected from customers, it is open to the company to include these carrying charges for recovery when filing its draft Rate Order following the issuance of this Decision. The Board is of the view that the application of carrying charges should be symmetrical. The Board also notes that an FAQ for the Board's Accounting Procedures Handbook, issued in August 2008, contemplated the application of carrying charges on OM&A and Amortization expense.

It is the Board's expectation that Board staff (and VECC if it so wishes), will review and confirm the calculations supporting the revised residual class-specific revenue requirements and provide any comments they may have with respect to the application of carrying charges in the event that PowerStream includes such charges for recovery in its draft Rate Order.

IMPLEMENTATION

The Board expects PowerStream to file detailed supporting material, including all relevant calculations showing the impact of this Decision on PowerStream's class-specific smart meter revenue requirements and the determination of the updated SMDR and SMIRR.

PowerStream requested an implementation date of November 1, 2011 for its new rates. Given the filing date and the time required to process an application of this nature, the Board has determined that an implementation date of December 1, 2011 is appropriate. In developing its draft Rate Order, PowerStream is directed to establish the SMDR based on a five month recovery period to April 30, 2012 and to accommodate within the SMDR the applicable revenue requirement amounts related to the month of November.

The SMIRR shall be effective and implemented on December 1, 2011. The Board notes that this rider is based on an annual revenue requirement and will be in effect until the effective date of PowerStream's next cost of service rate order.

COST AWARDS

The Board may grant cost awards to eligible stakeholders pursuant to its power under section 30 of the Ontario Energy Board Act, 1998. The Board will determine eligibility for costs in accordance with its *Practice Direction on Cost Awards*. When determining the amount of the cost awards, the Board will apply the principles set out in section 5 of the Board's *Practice Direction on Cost Awards*. The maximum hourly rates set out in the Board's Cost Awards Tariff will also be applied.

All filings to the Board must quote the file number, EB-2011-0128, be made through the Board's web portal at www.errr.ontarioenergyboard.ca, and consist of two paper copies and one electronic copy in searchable / unrestricted PDF format. Filings must clearly state the sender's name, postal address and telephone number, fax number and e-mail address. Parties must use the document naming conventions and document submission standards outlined in the RESS Document Guideline found at www.ontarioenergyboard.ca/OEB/Industry. If the web portal is not available, parties may email their documents to the address below. Those who do not have internet access are required to submit all filings on a CD in PDF format, along with two paper copies. Those who do not have computer access are required to file 7 paper copies.

All communications should be directed to the attention of the Board Secretary at the address below, and be received no later than 4:45 p.m. on the required date.

ADDRESS:
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
Attention: Board Secretary
Tel: 1-877-632-2727 (toll free)
Fax: 416-440-7656
E-mail: Boardsec@ontarioenergyboard.ca

THE BOARD ORDERS THAT:

1. PowerStream shall file with the Board, and shall also forward to VECC, a draft Rate Order attaching a proposed Tariff of Rates and Charges reflecting the Board's findings in this Decision and Order, within 7 days of the date of this Decision and Order. The draft Rate Order shall also include customer rate impacts and detailed supporting information showing the calculation of the final rates.

2. VECC and Board staff shall file any comments on the draft Rate Order with the Board and forward to PowerStream within 5 days of the date of filing of the draft Rate Order.

3. PowerStream shall file with the Board and forward to VECC responses to any comments on its draft Rate Order within 5 days of the date of receipt of the submission.

4. VECC shall file with the Board and forward to PowerStream its cost claim within 21 days from the date of this Decision and Order.

5. PowerStream shall file with the Board and forward to VECC any objections to the claimed costs within 35 days from the date of this Decision and Order.

6. VECC shall file with the Board and forward to PowerStream any responses to any objections for cost claims within 42 days of the date of this Decision and Order.

7. PowerStream shall pay the Board's costs incidental to this proceeding upon receipt of the Board's invoice.

DATED at Toronto, November 21, 2011

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary