



VIA RESS AND COURIER

March 14, 2008

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Staff Discussion Paper on Electricity Distributors: Customer Service, Rate Classification and Non-payment Risk, Board File Number EB-2007-0722**

As per your letter dated March 6, 2008, the Association of Major Power Consumers in Ontario (AMPCO) is interested in providing written comments on the staff discussion paper. I recognize that the Board has issued a decision on cost eligibility and ask respectfully that AMPCO also be considered eligible for a cost award.

#### **Participant's Interests and Receipt of Instructions**

AMPCO is a consumer interest advocacy organization that serves the interests of Ontario's major industries: forestry, chemical, mining and minerals, steel, petroleum products, cement, automotive and manufacturing industries and business consumers in general. AMPCO members are major investors, major employers and a major part of communities in which we operate, across Ontario.

AMPCO representatives receive their instructions from the AMPCO Board which is elected by the AMPCO members to represent their interests. The President of AMPCO has daily contact with many AMPCO members and communicates with the Executive and the Board of Directors on a frequent basis. Important issues are debated among Directors and members under the President's or the Chairman's facilitation, and policy decisions are made generally by consensus management. Instructions with respect to this proceeding will primarily come via this method. The AMPCO Board of Directors formally meets eight times per year and numerous other policy discussions take place during the year to identify and develop policy positions on important electricity and energy issues.

AMPCO communicates with members on current issues via newsletters and emails, as well as via the members-only section of the organization's website; members typically provide direct feedback on such issues via email and phone calls; as well, AMPCO holds two formal members' meetings per year, during which information on current issues is shared.

**Association of Major Power Consumers in Ontario**

[www.ampco.org](http://www.ampco.org)

372 Bay Street, Suite 1702  
Toronto, Ontario M5H 2W9

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AMPCO is a frequent participant in Ontario Energy Board ("OEB") proceedings in which matters of relevance to Ontario's large electricity consumers are being addressed. Our interest in this discussion paper relates to several sections, with particular interest in the definition for demand, management of non-payment risk, billing errors and customer classification and reassignment.

### **Participation**

AMPCO proposes to have its Technical Consultant, Wayne Clark, prepare comments on the staff discussion paper. Mr. Clark is well known to the Board and has been involved in a number of distribution related hearings and processes. A copy of his curriculum vitae is attached.

We request that copies of all documents and correspondence pertaining to this process be sent to Mr. Clark as follows:

Mr. Wayne Clark  
SanZoe Consulting Inc.  
25 Priest Avenue  
Minesing, ON L0L 1Y3  
Tel.: 705-728-3284  
Fax: 705-721-0974  
Cell: (705) 795-7823  
E-mail: [wayne.clark@explornet.com](mailto:wayne.clark@explornet.com)

We trust this letter will be sufficient to express AMPCO's interest in participating and that consideration be given to approving AMPCO's eligibility for a cost award. Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Adam White", with a long horizontal flourish extending to the right.

Adam White  
President

Copy to:  
Mr. Wayne Clark

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## WAYNE CLARK

### Proposed Position:

**Name of Firm.** SanZoe Consulting, Inc.  
**Profession:** Consultant/ Electrical Engineer  
**Date of Birth:** August 11, 1946  
**Years Experience:** 31 years **Nationality:** Canadian

### Membership in Professional Societies:

- Member, Professional Engineers of Ontario
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### Key Qualifications:

- Managed development of maintenance and capital programs for distribution, transmission and sub-transmission facilities.
  - Assisted a distribution utility in the development of an asset condition assessment and management program that is technically justified, properly programmed and documented for regulatory submission.
  - Provided project management and direction for the development and implementation of a Key Performance Indicator (KPI) reporting system.
  - Aided a regulatory authority in the development of distribution –specific utility safety standards.
  - Provided interim asset management services to a distribution utility.
  - Developed strategies for maintaining the value and service levels of a \$2.5B distribution system; initiated key programs to build foundations for ongoing asset sustainment and secured the regulatory support necessary.
  - Managed one million customers, 300-person/year CIS and Call Centre projects from process re-engineering and functions specifications through to “go-live.”
  - Restructured distribution system and customer operations in area serving 100,000 retail customers, with annual revenue of approximately \$140M; reduced operating, maintenance and administration costs by approximately 40% and working capital; double targets in first year and doubled net income in second year.
  - Managed the operation, development and delivery of retail information systems.
  - Assisted a distribution utility with project management support in the development and implementation of a large Enterprise Resource Planning (ERP) system.
  - Assisted a large utility in the procurement of specialized IT consulting services for a large assessment project.
  - Participated on client's behalf in regulatory development and rate application proceedings, as well as Wholesale Market Development.
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### Education:

- Bachelor of Applied Science, Electrical, University of Windsor, Canada, 1976
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### Employment Record:

#### 2000 – Present Independent Consultant

- Engagements cover a broad span of utility business areas including asset management, project management, information systems, utility R&D, demand response studies and

program development, regulatory development and intervention and wholesale market development.

- Clients include: Aquila Networks Canada, Electrical Safety Authority of Ontario, CEA Technologies, Association of Major Power Consumers in Ontario, Acres International, Hydro One and Toronto Hydro, City of Saskatoon, Independent Electricity System Operator (IESO), CVRD INCO, Algoma Steel, Wardrop International, Cap Gemini, Ontario Power Authority.

**2000                    Manager – Sustainment (Lines)**  
Hydro One (Ontario Hydro)

- Managed development of maintenance and capital programs for distribution and transmission lines.

**2000                    Manager – Distribution Development**  
Hydro One (Ontario Hydro)

- Managed development of maintenance and capital programs for distribution and subtransmission facilities (concurrent with above position).

**1999                    Manager – Distribution Network Asset Sustainment Strategies and Standards**  
Hydro One (Ontario Hydro)

- Developed strategies for maintaining the value and service levels of Hydro One's \$2.5B distribution system; initiated the key programs to build the foundations for ongoing asset sustainment and secure the regulatory support necessary for success.
- Led the main due diligence team on a major utility acquisition opportunity.

**1995-1998            Director- Customer Information Technology**  
Hydro One (Ontario Hydro)

- Managed one million customer, 300 person-year CIS and Call Centre projects from process reengineering and functional specifications through to go-live.

**1993-1995            Manager - Georgian Bay Hydro**  
Hydro One (Ontario Hydro)

- Restructured Ontario Hydro's distribution system and customer operations in an area of central Ontario serving 100,000 retail customers, with annual revenue of approximately \$140 million. Reduced operating, maintenance and administration costs by approximately 40%, and working capital by a similar amount. As a profit centre, doubled targets in the first year, and doubled net income again in the second year. Managed a full suite of business and operating functions comprising as high as 300 staff.

**1990-1993            Manager -Materials Management**  
Ontario Hydro

- Developed and managed a corporate wide effort to improve logistics and reduce inventories across Ontario Hydro Regions Branch. By the time the project was suspended in a 1993 restructuring, inventories were down over a third, and component variety was reduced about 10%.

**1993                      Manager – Retail Projects**  
Ontario Hydro

- Concurrent with the position above, oversaw project management of all new distributing stations, development of a new station standard design, and planning for Hydro's subtransmission and station network. In concert with service providers, re-engineered the process of designing and managing distributing station projects in Hydro.

**1988-1990              Manager - Retail Business Systems**  
Ontario Hydro

- Managed the operation, development and delivery of Hydro's retail information systems, including:
- Turnaround of a failing Work Management System (WMS) project
- Developed a PC strategy to complement mainframe systems, including version control, PC-mainframe links and common user interfaces.

**1987                      Manager – Distribution Planning and Design**  
Ontario Hydro

- Led a staff of approximately 50 engineering and technical personnel in the development of distribution planning, material and construction standards, as well as planning of the subtransmission and station network.

**1984-1986              Area Manager Positions (Fenelon Falls, Bowmanville, Cobourg)**  
Ontario Hydro

- Managed customer service, billing, lines and forestry operations in local areas. Merged two area operations into one.

**1981 – 1983            Lines Superintendent - Central Region**  
Ontario Hydro

- Directed a group of 50 trades and technical staff accountable for the distribution and transmission lines work in the region around Toronto. This included the planning and development of the distribution system in the area surrounding the GTA.

**1976-1980              Progressive Engineering Positions**  
Ontario Hydro

- Developed expertise in a number of engineering areas, as well as supervisory skills. Developed technical knowledge of overcurrent and overvoltage protection, protection and control, overhead and underground distribution, maintenance programming and practices, live line work methods, transformers and stray voltage phenomena.

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**Languages:**

Language	Speaking	Reading	Writing
English	Excellent	Excellent	Excellent

**Countries of Experience:**

- Canada

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**Certification:**

I, the undersigned certify that to the best of my knowledge and belief, these data correctly describe my qualifications my experience and me.

