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October 30, 2012

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

RE: EB-2012-0263 Reply - Bluewater Power Smart Meter Final Disposition Draft Rate Order

Dear Ms. Walli

Bluewater Power Distribution Corporation ("Bluewater Power") submitted a Draft Rate Order on October 23, 2012. The draft rate order included revised Residential and General Service <50 kW smart meter final disposition rate riders, proposed Tariff of Rates and Charges, and rate impacts for the Residential and General Service < 50 kW rate classes, all filed in accordance with the Decision dated October 18, 2012. Another matter included with the draft rate order was a proposed correction to the sunset date for a rate rider in the Large Use rate class approved previously as part of the 2012 IRM.

The Board Staff submission dated October 25, 2012 notes only one concern with the supporting documents, being that the residential customer bill impact should be revised to reflect no change in the Debt Retirement Charge at current and proposed rates. The revised residential bill impact included with this Reply Submission addresses this point, but the change does not impact the Proposed Tariff of Rates and Charges. Otherwise, Board Staff submitted that the Draft Rate Order and supporting documents accurately reflect the Board's decision. Board Staff also support the notion that the Tariff of Rates and Charges reflect a correction to the sunset date for a rate rider in the Large Use rate class approved previously as part of the 2012 IRM.

VECC did not provide any comments on the Draft Rate Order.

Bluewater Power requests that the Proposed Tariff of Rates and Charges filed on October 23, 2012 be deemed final.

Sincerely,

L. Dugas

Leslie Dugas
Bluewater Power Distribution Corporation
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cc: (*via email*)
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Ms. Shelley Grice, shelley.grice@rogers.com

Appendix 2-W
Bill Impacts

Customer Class: Residential									
Consumption		800 kWh							
	Charge Unit	Current Board-Approved			Proposed			Impact	
		Rate (\$)	Volume	Charge (\$)	Rate (\$)	Volume	Charge (\$)	\$ Change	% Change
Monthly Service Charge	Monthly	\$ 13.80	1	\$ 13.80	\$ 13.80	1	\$ 13.80	\$ -	0.00%
Smart Meter Rate Adder		\$ -	1	\$ -		1	\$ -	\$ -	
			1	\$ -		1	\$ -	\$ -	
Distribution Volumetric Rate	per kWh	\$ 0.0188	800	\$ 15.04	\$ 0.0188	800	\$ 15.04	\$ -	0.00%
Smart Meter Disposition Rider	Monthly		1	\$ -	\$ 1.9400	1	\$ 1.94	\$ 1.94	
LRAM & SSM Rate Rider (2011)	per kWh	\$ 0.0004	800	\$ 0.32	\$ 0.0004	800	\$ 0.32	\$ -	0.00%
LRAM & SSM Rate Rider (2012)	per kWh	\$ 0.0002	800	\$ 0.16	\$ 0.0002	800	\$ 0.16	\$ -	0.00%
			800	\$ -		800	\$ -	\$ -	
			800	\$ -		800	\$ -	\$ -	
Sub-Total A				\$ 29.32			\$ 31.26	\$ 1.94	6.62%
Deferral Acct Disp (2011)	per kWh	\$ 0.0012	800	\$ 0.96	\$ 0.0012	800	\$ 0.96	\$ -	0.00%
Deferral Acct Disp (2012)	per kWh	-\$ 0.0017	800	\$ (1.36)	-\$ 0.0017	800	\$ (1.36)	\$ -	0.00%
Rate Rider for Tax Change	per kWh	-\$ 0.0005	800	\$ (0.40)	-\$ 0.0005	800	\$ (0.40)	\$ -	0.00%
			800	\$ -		800	\$ -	\$ -	
Low Voltage Service Charge		\$ 0.0002	800	\$ 0.16	\$ 0.0002	800	\$ 0.16	\$ -	0.00%
Smart Meter Entity Charge						800	\$ -	\$ -	
Sub-Total B - Distribution (includes Sub-Total A)				\$ 28.68			\$ 30.62	\$ 1.94	6.76%
RTSR - Network	per kWh	\$ 0.0068	828	\$ 5.63	\$ 0.0068	828	\$ 5.63	\$ -	0.00%
RTSR - Line and Transformation Connection	per kWh	\$ 0.0057	828	\$ 4.72	\$ 0.0057	828	\$ 4.72	\$ -	0.00%
Sub-Total C - Delivery (including Sub-Total B)				\$ 39.04			\$ 40.98	\$ 1.94	4.97%
Wholesale Market Service Charge (WMSC)	per kWh	\$ 0.0052	828	\$ 4.31	\$ 0.0052	828	\$ 4.31	\$ -	0.00%
Rural and Remote Rate Protection (RRRP)	per kWh	\$ 0.0011	828	\$ 0.91	\$ 0.0011	828	\$ 0.91	\$ -	0.00%
Standard Supply Service Charge	Monthly	\$ 0.2500	1	\$ 0.25	\$ 0.2500	1	\$ 0.25	\$ -	0.00%
Debt Retirement Charge (DRC)	per kWh	\$ 0.0070	800	\$ 5.60	\$ 0.0070	800	\$ 5.60	\$ -	0.00%
Energy - RPP - Tier 1	per kWh	\$ 0.0740	600	\$ 44.40	\$ 0.0740	600	\$ 44.40	\$ -	0.00%
Energy - RPP - Tier 2	per kWh	\$ 0.0870	228	\$ 19.88	\$ 0.0870	228	\$ 19.88	\$ -	0.00%
TOU - Off Peak	per kWh	\$ 0.0630	530	\$ 33.40	\$ 0.0630	530	\$ 33.40	\$ -	0.00%
TOU - Mid Peak	per kWh	\$ 0.0990	149	\$ 14.76	\$ 0.0990	149	\$ 14.76	\$ -	0.00%
TOU - On Peak	per kWh	\$ 0.1180	149	\$ 17.60	\$ 0.1180	149	\$ 17.60	\$ -	0.00%
Total Bill on RPP (before Taxes)				\$ 114.38			\$ 116.32	\$ 1.94	1.70%
HST		13%		\$ 14.87	13%		\$ 15.12	\$ 0.25	1.70%
Total Bill (including HST)				\$ 129.25			\$ 131.45	\$ 2.19	1.70%
Ontario Clean Energy Benefit ¹				-\$ 12.93			-\$ 13.14	-\$ 0.21	1.62%
Total Bill on RPP (including OCEB)				\$ 116.32			\$ 118.31	\$ 1.98	1.70%
Total Bill on TOU (before Taxes)				\$ 115.87			\$ 117.81	\$ 1.94	1.67%
HST		13%		\$ 15.06	13%		\$ 15.32	\$ 0.25	1.67%
Total Bill (including HST)				\$ 130.93			\$ 133.13	\$ 2.19	1.67%
Ontario Clean Energy Benefit ¹				-\$ 13.09			-\$ 13.31	-\$ 0.22	1.68%
Total Bill on TOU (including OCEB)				\$ 117.84			\$ 119.82	\$ 1.97	1.67%
Loss Factor (%)		3.56%		3.56%					

¹ Applicable to eligible customers only. Refer to the Ontario Clean Energy Benefit Act, 2010.

Note that the "Charge \$" columns provide breakdowns of the amounts that each bill component contributes to the total monthly bill at the referenced consumption level at existing and proposed rates.

Applicants must provide bill impacts for residential at 800 kWh and GS<50kW at 2000 kWh. In addition, their filing should cover the range that is relevant to their service territory, class by class. A general guideline of consumption levels follows:

Residential (kWh) - 100, 250, 500, 800, 1000, 1500, 2000

GS<50kW (kWh) - 1000, 2000, 5000, 10000, 15000

GS>50kW (kW) - 60, 100, 500, 1000

Large User - range appropriate for utility

Lighting Classes and USL - 150 kWh and 1 kW, range appropriate for utility.

ASSUMES RPP AND TOU COMMODITY PRICES AS OF NOVEMBER 1, 2012