

December 6, 2012

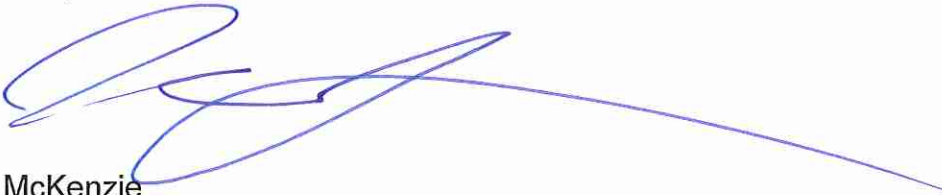
Ontario Energy Board
PO Box 2319
2300 Yonge St
Toronto, ON M4P 1E4
Attn: Board Secretary

**RE: Brant County Power Inc. (BCP) – 2013 3rd Generation IRM Rate Application
EB-2012-0108**

Please find attached responses to Board Staff Submissions on our 2013 distribution rates based on 3rd Generation IRM.

If you have any questions regarding this application, please do not hesitate to contact me directly.

Sincerely,



Ian McKenzie
Director of Finance and Regulatory Affairs

Reply Submission

Brant County Power is replying to various submissions' around our deferral and variance account balances. We hope that this completes the record and allows the OEB to make a final decision.

RSVA – 1588 Cost of Power and Global Adjustment Accounts

Board Staff have raised concerns around the interest relating to the above accounts for Dec. 31, 2010. Board Staff have provided a table summarizing the 2013 IRM continuity schedule and Appendix M or BCP's settlement agreement re: EB-2010-0125 (2011 CoS rate application).

BCP has investigated the discrepancy and does not have a complete answer for the identified discrepancy. We have reviewed our files and can't replicate the Appendix M schedules. BCP's 2013 continuity schedule is accurate and reflects the Boards direction on the treatment of these accounts.

BCP does point out that the combined total of the interest in the two accounts do reconcile to the same total, so we are only dealing with an allocation issue.

RSVA – 1586 Connection Charges Variance (Dec. 31, 2011)

The IRM rate model has a transposition error in tab 5, cell BO 27.

The original value was entered as \$914,717 and should have been \$917,417. BCP is providing an updated electronic IRM model to correct this error which reconciles the identified differences.

Customer Bill Impacts

BCP is still of the belief that the original requested timeframe of a 2 year disposition window is appropriate. Numerous other variance accounts owed from customers are spread over this same period.

BCP submits that if a 2 year period is permissible and appropriate to collect outstanding balances then this same period is appropriate to remit any balances owing to customers. This would essentially allow for netting out of deferral accounts that would smooth customer impacts and balance the cash position of the LDC (which BCP acknowledges is not a mandate of the Board, however is a functional management requirement).

BCP has supplied the bill impacts we are requesting (a 2 year disposition period) and the model provided by the OEB and completed by BCP allows for various customer classes impacts to be calculated.

BCP is of the view that providing a completed rate model does provide the required rate impacts.

All of which is respectfully submitted.