The Voice of Ontario's Electricity Distributors

June 6, 2013

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

Via web portal and by courier

Dear Board Secretary:

Re: Board File No. EB - 2012- 0383 Review of Cost Allocation Policy for Unmetered Loads

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interests of 75 publicly and privately owned LDCs in Ontario.

The EDA supports the recommendations made by the consultant in the report entitled "Review of Cost Allocation Policy for Unmetered Loads". The EDA agrees that distributors should continue to devote effort in explaining the OEB's cost allocation model and how it is used to develop charges for unmetered loads to their unmetered customers.

Distributors should continue to explain the distribution configuration system used to connect Streetlights and other Unmetered Loads to their customers. The EDA believes that the concerns of unmetered load customers regarding the consumption estimates used to bill the electricity consumption can be addressed by continued communication between distributors and unmetered load customers.

The EDA agrees that any change in technology used by unmetered loads impacting electricity consumption should be brought to the attention of distributors as soon as possible. The distributors can then update the electricity consumption estimates for billing purposes, if supported by evidence presented by unmetered load customers. However, the EDA would like to point out that the updated load profiles can only be implemented at the time of a distributor's rebasing.

Electricity Distributors Association

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Further, the EDA concurs with the consultant's recommendation that the OEB should assist LDCs in developing their own weighting factors for unmetered loads in the cost allocation methodology by providing examples of how to develop weighting factors for Services, Billing and Collecting.

Yours truly,

Teresa Sarkesian
Vice President, Policy and Government Affairs

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