



June 7, 2013

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Suite 2700
Toronto, ON, M4P 1E4

Dear Ms. Walli:

Re: Review of Cost Allocation Policy for Unmetered Loads, EB-2012-0383

The Coalition of Large Distributors (the “CLD”) comprises Enersource Hydro Mississauga Inc., Horizon Utilities Corporation, Hydro Ottawa Limited, PowerStream Inc., Toronto Hydro Electric System Limited, and Veridian Connections Inc. The CLD appreciated being able to participate in the Unmetered Loads Working Group and welcomes the opportunity provided by the Ontario Energy Board (the “OEB” or the “Board”) to comment on Elenchus Research Associates Inc.’s report entitled *Review of Cost Allocation Policy for Unmetered Loads* (the “Report”).

The CLD is supportive of the recommendations contained in the Report and agrees that changes to the current Cost Allocation Policy for Unmetered Loads and the associated Cost Allocation model are not warranted at this time. We would note that many Local Distribution Companies have been meeting regularly with their municipalities and other unmetered load customers to assist in understanding the regulatory process, the Cost Allocation model and the impacts on rates and will continue to do so.

The CLD also agrees that any changes to the Board’s Cost Allocation Policy and associated model should only be done after consultation with all affected stakeholders.

The CLD would recommend that the report include under Elenchus’ recommendations in section 7.5 e) Terminology and Definitions – Board Staff’s Responsibility, the following recommendation:

- Ensure that each LDC’s rate order uses the appropriate term with respect to the fixed service charges for the Unmetered Scattered Load Classes (“USL”), consistent with the billing determinant used to calculate the rate.

For example, a rate order should not refer to \$/connection if in fact it should be \$/device, based on the calculation. This situation has arisen due to conflicting definitions of the term ‘connection’ and the addition of this recommendation would align and standardize rate orders with the definitions in the Report. While this will not change the rates for the USL classes, it will assist in reducing any confusion.

The CLD also notes that Figure 4.2, the representation of the daisy-chain configuration is incomplete.

Yours truly,

(Original signed on behalf of the CLD by)

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