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Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs

April 7, 2014

BY COURIER

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

Dear Ms. Walli:

EB-2012-0383 – Hydro One Comments on Amendments to the Distribution System Code (Minimum Requirements Addressing Unmetered Loads for Inclusion in Distributors' Conditions of Service)

Hydro One supports the Board's proposal to add a statement to the Distribution System Code section 2.4.6 which will list four minimum requirements respecting unmetered loads that distributors must include in their Conditions of Service. The sharing of accurate data is critical to ensuring fair and accurate cost allocation and rate setting. Furthermore, a more explicit understanding of mutual responsibilities between a utility and its customers, as well as defined processes and timelines for updating and maintaining energy and equipment profiles and related data, will improve the utility's knowledge of them, their equipment and all their service needs, inclusive of billing. This can only enhance the 'two-way' relationship, a very valuable aspect of which, is the identification and mutually satisfactory resolution of potential issues much earlier in the process, during the data-gathering and validation stages.

Hydro One also notes that all of its customers, including unmetered load customers, are afforded the opportunity to involve themselves in its distribution rate applications, when Hydro One normally stakeholders these prior to a submission filing. They may also intervene during the proceeding (as other customers do), to assist in the Board's review of any material impacts on the allocation of costs and setting of rates.

Thank you for the opportunity to offer these comments.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank