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BY COURIER & RESS

Ms. Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 26th Floor, P.O. Box 2319
TORONTO, ON M4P 1E4

**Re: Board File No. EB-2014-0089
Kitchener-Wilmot Hydro Inc. - Licence No. ED-2002-0573
Application for Approval of 2015 Electricity Distribution Rates**

Dear Ms. Walli:

On November 6, 2014, the Ontario Energy Board issued its draft Rate Order (DRO) for the above mentioned Application. Kitchener-Wilmot Hydro Inc. (KWHI) has the following comments on the proposed DRO:

1. For the Street Lighting rate class (page 11 of the draft Tariff), the full description of the Global Adjustment Rate Rider is missing. The current description is “*2015 Applicable to Non-RPP customers only*”. The description should be changed to “*Rate Rider for Disposition of Global Adjustment Account (2015) – Effective until December 31, 2015 Applicable to Non-RPP customers only.*”
2. The description of the Rate Rider for Disposition of Deferral/Variance accounts (2015) for the Unmetered Scattered Load (USL) and Street Lighting (SL) rate classes (pages 5 & 6) is inconsistent with the description used for the other rate classes. For the USL & SL rate classes, the description says “... *effective from January 1, 2014 to December 31, 2014*” while for all other rate classes, the description says “... *effective until December 31, 2015*”.
3. The layout for the Standby Power Service Classification has been changed from KWHI’s 2014 Tariff (EB-2013-0147) on page 9 of the draft Tariff. This layout change has resulted in part of the rate class description being cut off. KWHI has attached a copy of page 9 of its 2014 Board-approved Tariff and suggests Board staff change the 2015 draft Tariff to match KWHI’s 2014 Tariff for this rate class.



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4. On page 10 of the draft Tariff, Specific Service Charges, two items have been misclassified to the Non-Payment of Account section from the Customer Administration section. These items are:

Service call – after regular hours
Specific Charge for Access to the Power Poles - \$/pole/year

Contact the undersigned should you require any further information.

Respectfully submitted,

Original Signed By:

Margaret Nanninga, MBA, CPA, CGA
Vice President Finance

Attachment

Kitchener-Wilmot Hydro Inc.
TARIFF OF RATES AND CHARGES
Effective Date January 1, 2014
Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0147

STANDBY POWER SERVICE CLASSIFICATION

This classification applies to an account with load displacement facilities that contracts with the distributor to provide emergency standby power when its load displacement facilities are not in operation. The level of the billing demand will be agreed to by the distributor and the customer, based on detailed manufacturer information/documentation such as name-plate rating of the load displacement facility. Further servicing details are available in the distributor's Conditions of Service.

APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

No rates and charges for the distribution of electricity and charges to meet the costs of any work or service done or furnished for the purpose of the distribution of electricity shall be made except as permitted by this schedule, unless required by the Distributor's Licence or a Code or Order of the Board, and amendments thereto as approved by the Board, or as specified herein.

Unless specifically noted, this schedule does not contain any charges for the electricity commodity, be it under the Regulated Price Plan, a contract with a retailer or the wholesale market price, as applicable. In addition, the charges in the MONTHLY RATES AND CHARGES – Regulatory Component of this schedule do not apply to a customer that is an embedded wholesale market participant.

It should be noted that this schedule does not list any charges or assessments that are required by law to be charged by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, charges for Ministry of Energy Conservation and Renewable Energy Program, the Provincial Benefit and any applicable taxes.

MONTHLY RATES AND CHARGES – Delivery Component – Approved on an Interim Basis

Standby Charge – for a month where standby power is not provided, the charge is based on the applicable General Service 50 to 4,999 kW or Large use Distribution Volumetric Charge applied to the contracted amount (e.g. nameplate rating of generation facility).