



February 17, 2015

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**RE: PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE – EB-2014-0198 COMMENTS FROM CORNWALL ELECTRIC**

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On February 5, 2015, the Ontario Energy Board (the "Board") gave notice under section 70.2 of the Ontario Energy Board Act, 1998 of proposed amendments to the Distribution System Code (the "DSC") in relation to billing frequency, the use of estimated billing, and billing accuracy. The Board's Notice invited interested parties to submit written comments on the proposed amendments to the DSC by February 19, 2015. These are the comments of Cornwall Street Railway Light and Power Company Limited ("Cornwall Electric"). These comments are limited to the particular circumstance of Cornwall Electric in relation to the proposed amendments.

#### **BACKGROUND**

Cornwall Electric is a licenced distributor, ED-2004-0405. In its Distribution Licence, Cornwall Electric is exempted from the Retail Settlement Code, the Standard Supply Service Code and identified sections of the Distribution System Code. These exemptions, in part, relate to the fact that Cornwall Electric is not connected to the IESO controlled grid. Cornwall Electric's electricity supply is procured through long-term energy contracts with Hydro Quebec.

Cornwall Electric is not subject to time-of-use pricing and its customers do not have smart meters or interval meters.

#### **BILLING FREQUENCY AND ESTIMATED BILLING**

It has been a long standing practice at Cornwall Electric to invoice its residential customers on a bi-monthly basis and its commercial/industrial customers on a monthly basis. Residential meters

are read on a bi-monthly schedule and invoices are produced on the basis of the energy consumed during the two months. Residential customers are billed on a bi-monthly cycle. Commercial/Industrial meters are read on a monthly basis and invoices are produced on the basis of the energy consumed as well as the demand achieved during the billing period. Commercial/Industrial customers are billed monthly.

Cornwall Electric does not use smart meters or interval meters (time of use pricing is not available to Cornwall Electric and its customers), therefore a change to monthly billing will increase meter reading costs in addition to the Board acknowledged incremental costs due to bill production and mailing and possible system or processes changes.

Cornwall Electric does offer its customers a monthly equalized billing plan as well an e-billing solution.

Cornwall Electric only uses estimated readings on an exceptional basis and customer disconnects are not based on an estimated bill.

### **BILLING ACCURACY**

Cornwall Electric has no comments related to the Board's proposal to include billing the accuracy measure in the DSC with the target level for the performance measure.

### **COMING INTO FORCE**

The Board has proposed that the proposed amendments regarding estimated billing and billing accuracy come into force on the date they are published on the Board's website after having been made by the Board and that the proposed amendment regarding monthly billing (proposed section 2.6.1A) will come into force on December 31, 2016.

Upon receipt of final notice by Cornwall Electric that the amendment regarding monthly billing (section 2.6.1A) will come into force, Cornwall Electric will make an application to the Board for an exemption to section 2.6.1A of the DSC unless otherwise acknowledged by the Board.

Yours truly,

Original Signed by:

Douglas R. Bradbury  
Director, Regulator Affairs