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April 2, 2015

Delivered by Courier and RESS

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

Attention: Kirsten Walli
Board Secretary

**Re: Applications for the Acquisition of Haldimand County Hydro Inc.
by Hydro One Inc. (EB-2014-0244)
Responses to Comments on Draft Rate Order**

Dear Ms. Walli:

Please find enclosed responses by Haldimand County Hydro Inc. ("HCHI") to Board Staff comments, issued March 30, 2015, on the draft Rate Order filed by HCHI on March 23, 2015.

An electronic copy in PDF format has been submitted through the Board's *Regulatory Electronic Submission System* ("RESS"). Similarly, an electronic copy in PDF format has been forwarded via email to the participating intervenors on record.

Yours truly,
HALDIMAND COUNTY HYDRO INC.

Original signed by

Jacqueline A. Scott
Finance Manager

Haldimand County Hydro Inc.
Applications for the Acquisition of Haldimand County Hydro Inc.
by Hydro One Inc.
EB-2014-0244
Responses to Board Staff Comments on Draft Rate Order

On March 12, 2015 the Ontario Energy Board (the “Board”) issued its Decision and Order (“Decision”) on Applications for the Acquisition of Haldimand County Hydro Inc. (“HCHI”) by Hydro One Inc. The Decision required HCHI to submit a draft Rate Order by March 23, 2015, reflecting the Board’s findings in the Decision. HCHI submitted a draft Rate Order and supporting documentation on March 23, 2015. The Decision provided for Intervenor and Board Staff to file any comments on the draft Rate Order with the Board by March 30, 2015. Comments on the draft Rate Order were received from Board Staff on March 30, 2015.

HCHI provides the following in response to Board Staff comments regarding the proposed Tariff of Rates and Charges.

Comment # 1

The descriptions for the Fixed and Variable Acquisition Rate Rider – effective until June 30, 2020, have been changed to Rate Rider per Hydro One Network’s [sic] Acquisition Agreement – effective until June 30, 2020.

Response

HCHI agrees with this comment.

Comment # 2

The description for Funding Adder for Renewable Energy Generation – effective until June 20 [sic], 2020, has been changed to Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order.

Response

HCHI agrees with this comment.

Comment # 3

A variable credit rate rider to the fifth decimal place of 0.00003 has been calculated for the Unmetered Scattered Load rate class.

Response

HCHI does not agree with this comment. Chapter 2 of the Board's *Filing Requirements for Electricity Distribution Rate Applications*, issued July 18, 2014, (at page 52) directs the following:

"Please note that monthly fixed charges must be shown to two decimal places while variable charges must be shown to four places. Distributors wishing to depart from this approach must provide a full explanation as to why they believe it is necessary."

In addition, the Board's electronic Incentive Regulation ("IRM") rate generator filing model, which includes the calculation of rates for rate riders, rounds rates to four decimal places. Accordingly, HCHI sees no reason to deviate from these existing guidelines and continues to submit that the variable credit rate riders round to the fourth decimal place for all affected rate classes.

Draft Rate Order

Attached as Appendix A is a draft Tariff of Rates and Charges reflecting these responses by HCHI to Board Staff comments.

All of which is respectfully submitted.

APPENDIX A
Draft Tariff of Rates and Charges

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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

EB-2014-0244

RESIDENTIAL SERVICE CLASSIFICATION

This classification applies to a customer's main place of abode and may include additional buildings served through the same meter, provided they are not rental income units. Residential includes Urban, Suburban and Farm customer's premises which can be occupied on a year-round and seasonal basis. Farm applies to properties actively engaged in agricultural production as defined by Statistics Canada. These premises must be supplied from a single phase primary line. The farm definition does not include tree, sod, or pet farms. Services to year-round pumping stations or other ancillary services remote from the main farm shall be classed as farm. 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, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

MONTHLY RATES AND CHARGES – Delivery Component

Service Charge	\$	17.01
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$	(0.17)
Rate Rider for Smart Metering Entity Charge – effective until October 31, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0248
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kWh	(0.0002)
Low Voltage Service Rate	\$/kWh	0.0004
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kWh	(0.0015)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kWh	0.0002
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0068
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0052

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

GENERAL SERVICE LESS THAN 50 kW SERVICE CLASSIFICATION

General Service does include farms supplied from polyphase primary lines. General Service includes commercial, industrial, educational, administrative, auxiliary and government services. It also includes combination services where a variety of uses are made of the service by the owner of one property. This classification applies to a non-residential account whose average monthly maximum demand is less than, or is forecast to be less than, 50 kW. 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.

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge	\$	26.94
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$	(0.27)
Rate Rider for Smart Metering Entity Charge – effective until October 31, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0190
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kWh	(0.0002)
Low Voltage Service Rate	\$/kWh	0.0004
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kWh	(0.0010)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kWh	0.0002
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0061
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0048

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION

General Service does include farms supplied from polyphase primary lines. General Service includes commercial, industrial, educational, administrative, auxiliary and government services. It also includes combination services where a variety of uses are made of the service by the owner of one property. This classification applies to a non-residential account whose average monthly maximum demand used for billing purposes is equal to or greater than, or is forecast to be equal to or greater than, 50 kW but less than 5,000 kW. Further servicing details are available in the distributor's Conditions of Service.

APPLICATION

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge	\$	83.61
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$	(0.84)
Distribution Volumetric Rate	\$/kW	3.9339
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kW	(0.0393)
Low Voltage Service Rate	\$/kW	0.1550
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kW	(0.1394)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kW	0.0195
Retail Transmission Rate – Network Service Rate	\$/kW	2.6016
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	2.0329

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION

This classification applies to an account taking electricity at 750 volts or less whose average monthly maximum demand is less than, or is forecast to be less than, 50 kW and the consumption is unmetered. Such connections include cable TV power packs, bus shelters, telephone booths, traffic lights, railway crossings, etc. The level of the consumption will be agreed to by the distributor and the customer, based on detailed manufacturer information/documentation with regard to electrical consumption of the unmetered load or periodic monitoring of actual consumption. 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.

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge (per connection)	\$	19.51
Rate Rider per Hydro One Networks' Acquisition Agreement (per connection) – effective until June 30, 2020	\$	(0.20)
Distribution Volumetric Rate	\$/kWh	0.0025
Low Voltage Service Rate	\$/kWh	0.0004
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kWh	(0.0015)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kWh	0.0002
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0061
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0048

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

SENTINEL LIGHTING SERVICE CLASSIFICATION

This classification refers to an account that is an unmetered lighting load supplied to a sentinel light. (Metered sentinel lighting is captured under the consumption of the principal service.) The consumption for these customers is assumed to have the same hourly consumption load profile as for Street Lighting. 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.

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It should be noted that this schedule does not list any charges, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

MONTHLY RATES AND CHARGES – Delivery Component

Service Charge (per connection)	\$	14.23
Rate Rider per Hydro One Networks' Acquisition Agreement (per connection) – effective until June 30, 2020	\$	(0.14)
Distribution Volumetric Rate	\$/kW	36.7261
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kW	(0.3673)
Low Voltage Service Rate	\$/kW	0.1099
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kW	(4.1655)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kW	0.6224
Retail Transmission Rate – Network Service Rate	\$/kW	1.8886
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	1.4910

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

STREET LIGHTING SERVICE CLASSIFICATION

This classification applies to an account for roadway lighting with a Municipality, Regional Municipality, Ministry of Transportation and private roadway lighting, controlled by photo cells. The consumption for these customers will be based on the calculated connected load times the required lighting times established in the approved OEB street lighting load shape template. 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.

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge (per connection)	\$	5.70
Rate Rider per Hydro One Networks' Acquisition Agreement (per connection) – effective until June 30, 2020	\$	(0.06)
Distribution Volumetric Rate	\$/kW	14.5882
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kW	(0.1459)
Low Voltage Service Rate	\$/kW	0.1130
Rate Rider for Application of CGAAP Accounting Changes – effective until April 30, 2019	\$/kW	(1.4430)
Funding Adder for Renewable Energy Generation – in effect until the effective date of the next cost of service based rate order	\$/kW	0.2152
Retail Transmission Rate – Network Service Rate	\$/kW	1.8791
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	1.4604

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

EMBEDDED DISTRIBUTOR SERVICE CLASSIFICATION FOR HYDRO ONE NETWORKS INC.

This classification applies to Hydro One Networks Inc., an electricity distributor licensed by the Board, and provided electricity by means of Haldimand County Hydro Inc.'s distribution facilities. 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.

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge	\$	464.17
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$	(4.64)
Distribution Wheeling Service Rate	\$/kW	1.4304
Rate Rider per Hydro One Networks' Acquisition Agreement – effective until June 30, 2020	\$/kW	(0.0143)
Retail Transmission Rate – Network Service Rate	\$/kW	2.9566
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	2.3933

MONTHLY RATES AND CHARGES – Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

microFIT GENERATOR SERVICE CLASSIFICATION

This classification applies to an electricity generation facility contracted under the Ontario Power Authority's microFIT program and connected to the distributor's distribution system. 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.

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MONTHLY RATES AND CHARGES – Delivery Component

Service Charge	\$	5.40
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Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

Effective and Implementation Date July 1, 2015

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EB-2014-0244

ALLOWANCES

Transformer Allowance for Ownership - per kW of billing demand/month	\$/kW	(0.60)
Primary Metering Allowance for transformer losses – applied to measured demand and energy	%	(1.00)

SPECIFIC SERVICE CHARGES

APPLICATION

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Customer Administration

Legal letter charge	\$	15.00
Credit reference/credit check (plus credit agency costs)	\$	15.00
Returned Cheque (plus bank charges)	\$	15.00
Account set up charge/change of occupancy charge (plus credit agency costs if applicable)	\$	30.00
Meter dispute charge plus Measurement Canada fees (if meter found correct)	\$	30.00

Non-Payment of Account

Late Payment - per month	%	1.50
Late Payment - per annum	%	19.56
Collection of account charge – no disconnection	\$	30.00
Disconnect/Reconnect Charge - At Meter During Regular Hours	\$	65.00
Disconnect/Reconnect Charge - At Meter After Regular Hours	\$	185.00
Disconnect/Reconnect at pole – during regular hours	\$	185.00
Disconnect/Reconnect at pole – after regular hours	\$	415.00
Install/Remove load control device – during regular hours	\$	65.00
Install/Remove load control device – after regular hours	\$	185.00

Other

Temporary service install & remove – overhead – no transformer	\$	500.00
Specific Charge for Access to the Power Poles – per pole/year	\$	22.35
Bell Canada Pole Rentals	\$	18.08
Norfolk Pole Rentals – Billed	\$	28.61

Haldimand County Hydro Inc.

TARIFF OF RATES AND CHARGES

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EB-2014-0244

RETAIL SERVICE CHARGES (if applicable)

APPLICATION

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Retail Service Charges refer to services provided by a distributor to retailers or customers related to the supply of competitive electricity

One-time charge, per retailer, to establish the service agreement between the distributor and the retailer	\$	100.00
Monthly Fixed Charge, per retailer	\$	20.00
Monthly Variable Charge, per customer, per retailer	\$/cust.	0.50
Distributor-consolidated billing monthly charge, per customer, per retailer	\$/cust.	0.30
Retailer-consolidated billing monthly credit, per customer, per retailer	\$/cust.	(0.30)
Service Transaction Requests (STR)		
Request fee, per request, applied to the requesting party	\$	0.25
Processing fee, per request, applied to the requesting party	\$	0.50
Request for customer information as outlined in Section 10.6.3 and Chapter 11 of the Retail Settlement Code directly to retailers and customers, if not delivered electronically through the Electronic Business Transaction (EBT) system, applied to the requesting party		
Up to twice a year		no charge
More than twice a year, per request (plus incremental delivery costs)	\$	2.00

LOSS FACTORS

If the distributor is not capable of prorating changed loss factors jointly with distribution rates, the revised loss factors will be implemented upon the first subsequent billing for each billing cycle.

Total Loss Factor – Secondary Metered Customer < 5,000 kW	1.0655
Total Loss Factor – Primary Metered Customer < 5,000 kW	1.0548
Total Loss Factor – Embedded Distributor – Hydro One Networks Inc.	1.0288