



June 16, 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: APPLICATION BY CORNWALL STREET RAILWAY LIGHT AND POWER COMPANY LIMITED  
FOR AN EXEMPTION FROM THE PROVISIONS OF THE DISTRIBUTION SYSTEM CODE  
REQUIRING MONTHLY BILLING**

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Please find accompanying this letter two (2) copies of an application by Cornwall Street Railway Light and Power Company Limited ("Cornwall Electric") for an exemption from the provisions of the Distribution System Code requiring monthly billing.

If you have any questions in connection with the above matter, please do not hesitate to contact the undersigned at (905) 994-3634.

Yours truly,

*Original Signed by:*

Douglas Bradbury, P.Eng,  
Director Regulatory Affairs

Enclosure

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**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, (Schedule B);

**AND IN THE MATTER OF** an Application by Cornwall Street Railway Light and Power Company Limited for an Order or Orders including an exemption from the provisions of the Distribution System Code requiring monthly billing

**Cornwall Street Railway Light and Power Company Limited  
("Cornwall Electric")**

**Application for an Exemption to Provisions of the  
Distribution System Code**

**June 16, 2015**

## **APPLICATION**

1. The Applicant is Cornwall Electric, Cornwall Electric is an Ontario corporation carrying on the business of owning and operating electricity distribution facilities in Ontario.
2. Cornwall Electric requests an exemption from the provisions of the Distribution System Code (the "Code") pertaining to billing frequency, namely sections 2.6.1 A.
3. Cornwall Electric requests that the Board establish the exemption to begin on April 15, 2015, the date on which the subject requirements came into force, and to remain in place indefinitely.
4. Cornwall Electric requests that this proceeding be conducted by way of a written hearing.
5. Cornwall Electric also requests an interim exemption be granted by the Board as of April 15, 2015 (the date on which the aforementioned requirements came into force) until such time the Board renders a final decision in this application.

## INTRODUCTION

On September 18, 2014, the Board issued a *Draft Report of the Board on Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance* (the "draft Report"). The draft Report also noted that with smart meters deployed to virtually all residential customers, the Board's expectation was that all customers receive bills with actual consumption data, with limited exceptions<sup>1</sup>. As well in the draft Report the Board stated "By undertaking this initiative, the Board expects to take advantage of the recent upgrades to the electricity system and investments in smart meters to provide additional benefits for customers"<sup>2</sup>.

On February 5, 2015, the Board issued a Notice of Proposal to Amend a Code (EB-2014-0198). The Board's proposed amendments related to billing frequency, the use of estimated billing and billing accuracy requirements for all electricity distributors. This Notice of Proposal invited interested parties to submit written comments on the proposed amendments to the Distribution System Code. Cornwall Electric provided written comments on February 17, 2015 and is attached hereto as Appendix A.

On April 15, 2015 the Board issued the Amendments to the Code.

In its Notice of Amendments on April 15, 2015, the Board noted that "*some distributors argued that they should be exempt from some of these proposed amendments because of other exemptions they currently have in place for other codes or provisions of the DSC. ... These distributors can also apply for a licence exemption. For any exemption application, distributors will have to satisfy the OEB that the code provision should not apply to them.*"

## EXEMPTION REQUEST

Cornwall Electric is hereby requesting an amendment to its Distribution Licence to provide an exemption to Section 2.6.1 A of the Distribution System Code.

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<sup>1</sup> Notice of Proposal to Amend a Code (EB-2014-0198) issued on February 5, 2015, page 2

<sup>2</sup> Draft Report of the Board on Electricity and Natural Gas Distributors' Residential Customer Billing, September 28, 2014, page 2

*2.6.1A A distributor shall issue a bill to each non-seasonal residential customer and each general service < 50kW customer on a monthly basis.*

As referenced earlier, in the draft Report, the Board noted that by undertaking this initiative, the Board expects to take advantage of the recent upgrades to the electricity system and investments in smart meters to provide additional benefits for customers.

Cornwall Electric is not connected to the Ontario electricity grid and is therefore not a participant in the Ontario electricity market. Time of use pricing is not available to Cornwall Electric. Cornwall Electric does not use smart meters or interval meters consequently time of use pricing is not available to Cornwall Electric's customers. Subsequently, the investments in smart meters referenced in the draft Report does not apply to Cornwall Electric.

As stated in Cornwall Electric's written comments (Appendix A), 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 does not have a general service < 50kW customer class).

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

## **PROPOSED LICENCE AMENDMENTS**

The Licensee is exempt from the provisions of Section 2.6.1A of the Distribution System Code, requiring monthly billing for residential and general service < 50 kW customers.