



April 16, 2021

Ms. Christine E. Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Algoma Power Inc. – Compliance Plan Regarding Regulatory Liability for Dubreuil Distribution System (EB-2018-0271)**

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Algoma Power Inc. (“API”) is writing in respect of a condition contained in the OEB’s April 4, 2019 decision and order approving the sale of Dubreuil Lumber Inc.’s (“DLI”) distribution system to API (the “Decision”). In the Decision, the OEB approved a temporary licence condition requested by API, which would allow API time to bring the Dubreuil distribution system into compliance with OEB code provisions in a manner more consistent with the OEB’s compliance and enforcement role under the OEB Act.<sup>1</sup>

While the temporary licence condition extends to December 31, 2024, the Decision required API to file a compliance plan by April 1, 2021, describing its plan to address all circumstances that are not in compliance with regulatory requirements.

Since acquiring the Dubreuil distribution system, API confirms that it has undertaken extensive integration activity, including investigation into regulatory compliance issues, which has resulted in completion of the following activities:

1. API has replaced a number of oil-filled transformers in order to address environmental concerns.
2. API’s most recent annual audit for compliance with the Ontario Electrical Distribution Safety Regulation (Regulation 22/04) included the Dubreuil distribution system and determined that API was fully compliant with the Regulation.
3. API is in the process of constructing a new substation that will allow the existing Substation #2 to be decommissioned, improving public and worker safety and system reliability. API has also taken interim steps to ensure that there are no undue hazards associated with the existing Substation #2, in accordance with Regulation 22/04.

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<sup>1</sup>EB-2018-0271, Decision and Order, April 4, 2019, p.25

4. All operations, maintenance and emergency response activities in relation to the Dubreuil distribution system have been fully integrated into API's operations.
5. API has investigated all metering installations in Dubreuilville, has replaced all electricity meters with smart meters for residential and small commercial customers, and has replaced other metering equipment as required to ensure compliance with Measurement Canada requirements and OEB code requirements.
6. API has fully integrated the recently installed smart meters into its AMI infrastructure and offers customer choice between TOU and Tiered rates for eligible RPP customers.
7. API has started billing street lighting load in the Town of Dubreuilville, which was previously unbilled.
8. API has fully integrated the former DLI customers into its Customer Information System.
9. All customer service interactions, billing and other related processes for the former DLI customers are handled in the same manner as for other API customers, in compliance with all applicable OEB codes and requirements.
10. Customer counts, costs and asset information related to the former DLI customers and the Dubreuil distribution system have been fully integrated into API's RRR filings.

In consideration of the compliance related activities completed to date, as summarized above, API is not currently aware of any compliance matters that remain unresolved. A plan for addressing matters of non-compliance, as contemplated in the Decision, is therefore not required.

Sincerely,

Greg Beharriell, P.Eng.  
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