



January 14, 2011
via RESS and email

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St., 27th Floor
Toronto, ON, M4P 1E4

Dear Ms. Walli:

RE: Proposed Revisions to the Ontario Energy Board Cost Assessment Model (the "Model") to reflect the Proposed Amendment to Ontario Regulation 16/08
Board File: EB-2010-0362

The Coalition of Large Distributors (CLD) comprises Enersource Hydro Mississauga Inc., Horizon Utilities Corporation, Hydro Ottawa Limited, PowerStream Inc., Toronto Hydro-Electric System Limited, and Veridian Connections Inc.

The CLD supports the proposed revisions to the Model to reflect the amendments made as of January 1, 2011 to Ontario Regulation 16/08, which amendments added two classes of persons who are liable to pay an assessment with respect to expenses incurred and expenditures made by the Ontario Energy Board (the "Board"). These two classes are (i) licensed gas marketers (but not broader public sector procurement agents that engage in gas marketing to only members of the broader public sector), and (ii) licensed retailers who retail electricity to low-volume consumers (but not broader public sector procurement agents that retail electricity to only members of the broader public sector).

The Board's proposed apportionment of the total amount to be recovered by the cost assessments is reasonable, and may even positively influence the behaviour of the two new classes of payers. That is, the proposed combination of apportioning costs based on a combination of two factors, one being the number of customers and two being the average number of complaints received by the Board's Consumer Relations Centre, may encourage electricity retailers and gas marketers to work even harder to minimize customer complaints. This outcome would be good for the collective Ontario natural gas and electricity industries.

Although not included in the recent amendments to O. Reg. 16/08, another class of persons that has increased its contributions to the Board's costs and expenditures is licensed unit sub-meter providers. The CLD respectfully requests the Board to monitor the activities and costs affiliated with this class of persons, and keep the government apprised of this information, particularly if costs continue to increase. This may prompt a further amendment to O. Reg. 16/08, adding licensed unit sub-meter providers to be liable for a portion of the Board's assessment in the future.

Thank you for the opportunity to comment on this consultation.

Yours truly,

(Original signed on behalf of the CLD by)

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