



EB-2012-0148

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 Milton Hydro Distribution Inc. for an order or orders approving or fixing just and reasonable distribution rates and other charges, to be effective May 1, 2013.

BEFORE: Marika Hare
Presiding Member

DECISION AND ORDER
April 4, 2013

Introduction

Milton Hydro Distribution Inc. ("Milton Hydro"), a licensed distributor of electricity, filed an application with the Ontario Energy Board (the "Board") on September 14, 2012 under section 78 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B), seeking approval for changes to the rates that Milton Hydro charges for electricity distribution, to be effective May 1, 2013.

Milton Hydro is one of 77 electricity distributors in Ontario regulated by the Board. The *Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors* (the "IR Report"), issued on July 14, 2008, established a three year plan for 3rd generation incentive regulation mechanism ("IRM") (i.e., rebasing plus three years). In its October 27, 2010 letter regarding the development of a Renewed Regulatory Framework for Electricity ("RRFE"), the Board announced that it was extending the IRM plan until such time as the RRFE policy initiatives have been substantially completed. In a letter dated October 18, 2012, the Board stated its expectation that the three rate

setting methods set out in the *Report of the Board – Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach* would be available for the 2014 rate year.

As part of the plan, Milton Hydro is one of the electricity distributors that will have its rates adjusted for 2013 on the basis of the IRM process, which provides for a mechanistic and formulaic adjustment to distribution rates and charges between cost of service applications. Milton Hydro also sought approval for smart meter cost recovery and lost revenue adjustment mechanism (“LRAM”) recovery.

To streamline the process for the approval of distribution rates and charges for distributors, the Board issued its IR Report, *Supplemental Report of the Board on 3rd Generation Incentive Regulation for Ontario’s Electricity Distributors* on September 17, 2008 (the “Supplemental Report”), and *Addendum to the Supplemental Report of the Board on 3rd Generation Incentive Regulation for Ontario’s Electricity Distributors* on January 28, 2009 (collectively the “Reports”). Among other things, the Reports provide the relevant guidelines for 2013 rate adjustments for distributors applying for distribution rate adjustments pursuant to the IRM process. On June 28, 2012, the Board issued an update to Chapter 3 of the Board’s *Filing Requirements for Transmission and Distribution Applications* (the “Filing Requirements”), which outlines the application filing requirements for IRM applications based on the policies in the Reports.

Notice of Milton Hydro’s rate application was given through newspaper publication in Milton Hydro’s service area advising interested parties where the rate application could be viewed and advising how they could intervene in the proceeding or comment on the application. No letters of comment were received. The Notice of Application indicated that intervenors could be eligible for cost awards with respect to Milton Hydro’s proposed smart meter cost recovery and its request for LRAM recovery. The Vulnerable Energy Consumers Coalition (“VECC”) applied and was granted intervenor status in this proceeding. The Board granted VECC eligibility for cost awards in regards to Milton Hydro’s request for smart meter cost recovery and LRAM recovery. Board staff also participated in the proceeding. The Board proceeded by way of a written hearing.

While the Board has considered the entire record in this proceeding, it has made reference only to such evidence as is necessary to provide context to its findings. The following issues are addressed in this Decision and Order:

- Price Cap Index Adjustment;
- Rural or Remote Electricity Rate Protection Charge;
- Wholesale Market Service Rate;
- Smart Metering Entity Charge;
- MicroFIT Service Charge;
- Shared Tax Savings Adjustments;
- Retail Transmission Service Rates;
- Review and Disposition of Group 1 Deferral and Variance Account Balances;
- Review and Disposition of Lost Revenue Adjustment Mechanism; and
- Smart Meter Cost Recovery.

Price Cap Index Adjustment

As outlined in the Reports, distribution rates under the IRM are to be adjusted by a price escalator, less a productivity factor of 0.72% and a stretch factor.

On March 21, 2013, the Board announced a price escalator of 1.6% for those distributors under IRM that have a rate year commencing May 1, 2013.

The stretch factors are assigned to distributors based on the results of two benchmarking evaluations to divide the Ontario industry into three efficiency cohorts. In its letter to Licensed Electricity Distributors dated November 28, 2012 the Board assigned Milton Hydro to efficiency cohort 2, being the middle group and a cohort specific stretch factor of 0.4%.

The Board therefore has determined, on that basis, that the resulting price cap index adjustment is 0.48% (i.e. Change 1.6% - (0.72% + 0.4%)). The price cap index adjustment applies to distribution rates (fixed and variable charges) uniformly across customer classes.

The price cap index adjustment does not apply to the following components of delivery rates:

- Rate Riders;
- Rate Adders;
- Low Voltage Service Charges;

- Retail Transmission Service Rates;
- Wholesale Market Service Rate;
- Rural or Remote Rate Protection Charge;
- Standard Supply Service – Administrative Charge;
- Transformation and Primary Metering Allowances;
- Loss Factors;
- Specific Service Charges;
- MicroFIT Service Charge; and
- Retail Service Charges.

Rural or Remote Electricity Rate Protection Charge

On March 21, 2013, the Board issued a Decision with Reasons and Rate Order (EB-2013-0067) establishing that the Rural or Remote Electricity Rate Protection (“RRRP”) used by rate regulated distributors to bill their customers shall be \$0.0012 per kilowatt hour effective May 1, 2013. The draft Tariff of Rates and Charges flowing from this Decision and Order reflects this RRRP charge.

Wholesale Market Service Rate

On March 21, 2013, the Board issued a Decision with Reasons and Rate Order (EB-2013-0067) establishing that the Wholesale Market Service rate (“WMS rate”) used by rate regulated distributors to bill their customers shall be \$0.0044 per kilowatt hour effective May 1, 2013. The draft Tariff of Rates and Charges flowing from this Decision and Order reflects this WMS rate.

Smart Metering Entity Charge

On March 28, 2013, the Board issued a Decision and Order (EB-2012-0100/EB-2012-0211) establishing a Smart Metering Entity charge of \$0.79 per month for Residential and General Service < 50kW customers for those distributors identified in the Board’s annual *Yearbook of Electricity Distributors*. This charge will be in effect from May 1, 2013 to October 31, 2018. The draft Tariff of Rates and Charges flowing from this Decision and Order reflects this Smart Metering Entity charge.

MicroFIT Service Charge

On September 20, 2012, the Board issued a letter advising that the default province-wide fixed monthly charge for all electricity distributors related to the microFIT Generator Service Classification was to be updated to \$5.40 per month effective with the implementation of electricity distributors' 2013 rates applications. The draft Tariff of Rates and Charges flowing from this Decision and Order reflects the new default microFIT service charge.

Shared Tax Savings Adjustments

In its Supplemental Report, the Board determined that a 50/50 sharing of the impact of currently known legislated tax changes, as applied to the tax level reflected in the Board-approved base rates for a distributor, is appropriate.

The calculated annual tax reduction will be allocated to customer rate classes on the basis of the Board-approved base-year distribution revenue. These amounts will be refunded to customers over a 12-month period, through a volumetric rate rider using annualized consumption by customer class underlying the Board-approved base rates.

Milton Hydro's application identified a total tax sharing amount of \$10,632 resulting in a shared amount of \$5,316 to be recovered from rate payers. Milton Hydro noted that the calculated volumetric rate riders from the Tax-Sharing Workform indicate amounts with low levels of materiality for several of its customer rate classes. Milton Hydro requested that it be allowed to record the total amount to be refunded in Account 1595 to be disposed in a future rate application, when sufficient balances have accumulated to ensure that the intended disposition results are achieved.

In its submission, Board staff took no issue with Milton Hydro's proposal to record the Tax-Sharing amount of \$5,316 in Account 1595 for future disposition.

The Board approves Milton Hydro's request and directs Milton Hydro to record the tax sharing amount of \$5,316 in variance Account 1595 by March 31, 2013 for disposition at a future date.

Retail Transmission Service Rates (“RTSRs”)

Electricity distributors are charged for transmission costs at the wholesale level and subsequently pass these charges on to their distribution customers through the RTSRs. Variance accounts are used to capture timing differences and differences in the rate that a distributor pays for wholesale transmission service compared to the retail rate that the distributor is authorized to charge when billing its customers (i.e. variance Accounts 1584 and 1586).

On June 22, 2012 the Board issued revision 3.0 of the *Guideline G-2008-0001 - Electricity Distribution Retail Transmission Service Rates* (the “RTSR Guideline”). The RTSR Guideline outlines the information that the Board requires electricity distributors to file to adjust their RTSRs for 2013. The RTSR Guideline requires electricity distributors to adjust their RTSRs based on a comparison of historical transmission costs adjusted for the new Ontario Uniform Transmission Rates (“UTRs”) levels and the revenues generated under existing RTSRs. Similarly, embedded distributors whose host is Hydro One Networks Inc. (“Hydro One”) should adjust their RTSRs to reflect any changes in Hydro One’s Sub-Transmission class RTSRs. The objective of resetting the rates is to minimize the prospective balances in Accounts 1584 and 1586. In order to assist electricity distributors in the calculation of the distributors’ specific RTSRs, Board staff provided a filing module.

Milton Hydro is a partially embedded distributor whose host is Hydro One.

On December 20, 2012 the Board issued its Rate Order for Hydro One Transmission (EB-2012-0031) which adjusted the UTRs effective January 1, 2013, as shown in the following table:

2013 Uniform Transmission Rates

Network Service Rate	\$3.63 per kW
<u>Connection Service Rates</u>	
Line Connection Service Rate	\$0.75 per kW
Transformation Connection Service Rate	\$1.85 per kW

The Board also approved new rates for Hydro One Sub-Transmission class RTSRs effective January 1, 2013 (EB-2012-0136), as shown in the following table.

2013 Sub-Transmission RTSRs

Network Service Rate	\$3.18 per kW
<u>Connection Service Rates</u>	
Line Connection Service Rate	\$0.70 per kW
Transformation Connection Service Rate	\$1.63 per kW

The Board finds that these 2013 UTRs and Sub-Transmission class RTSRs are to be incorporated into the filing module.

Review and Disposition of Group 1 Deferral and Variance Account Balances

The *Report of the Board on Electricity Distributors' Deferral and Variance Account Review Report Initiative* (the "EDDVAR Report") provides that, during the IRM plan term, the distributor's Group 1 account balances will be reviewed and disposed if the preset disposition threshold of \$0.001 per kWh (debit or credit) is exceeded. The onus is on the distributor to justify why any account balance in excess of the threshold should not be disposed.

Milton Hydro's 2011 actual year-end total balance for Group 1 Accounts including interest projected to April 30, 2013 is a debit of \$1,813,107. This amount results in a total debit claim of \$0.0025 per kWh, which exceeds the preset disposition threshold. Milton Hydro proposed to dispose of this debit amount over a one-year period.

In its submission, Board staff noted that the principal amounts to be disposed as of December 31, 2011 reconcile with the amounts reported as part of the *Reporting and Record-keeping Requirements* ("RRR"). Board staff submitted that the amounts should be disposed on a final basis. Board staff further submitted that Milton Hydro's proposal for a one-year disposition period is in accordance with the EDDVAR Report.

The Board approves, on a final basis, the disposition of a debit balance of \$1,813,107 as of December 31, 2011, including interest as of April 30, 2013 for Group 1 accounts. These balances are to be disposed over a one year period from May 1, 2013 to April 30, 2014.

The table below identifies the principal and interest amounts approved for disposition for Group 1 accounts.

Account Name	Account Number	Principal Balance A	Interest Balance B	Total Claim C = A + B
LV Variance Account	1550	\$1,290	-\$362	\$928
RSVA - Wholesale Market Service Charge	1580	-\$781,071	-\$18,343	-\$799,414
RSVA - Retail Transmission Network Charge	1584	\$723,934	\$17,771	\$741,705
RSVA - Retail Transmission Connection Charge	1586	\$417,403	\$9,736	\$427,139
RSVA - Power (excluding Global Adjustment)	1588	-\$433,017	-\$17,754	-\$450,771
RSVA - Power – Global Adjustment Sub-Account	1588	\$1,643,297	\$63,859	\$1,707,157
Recovery of Regulatory Asset Balances	1590	\$0	-\$158	-\$158
Disposition and Recovery of Regulatory Balances (2008)	1595	\$410,811	-\$228,043	\$182,768
Disposition and Recovery of Regulatory Balances (2009)	1595	-\$31,408	\$35,160	\$3,752
Total Group 1 Excluding Global Adjustment Sub-Account				
Total Group 1				\$1,813,107

For accounting and reporting purposes, the respective balance of each Group 1 account approved for disposition shall be transferred to the applicable principal and interest carrying charge sub-accounts of Account 1595 pursuant to the requirements specified in Article 220, Account Descriptions, of the *Accounting Procedures Handbook for Electricity Distributors*. The date of the journal entry to transfer the approved account balances to the sub-accounts of Account 1595 is the date on which disposition of the balances is effective in rates, which generally is the start of the rate year. This entry should be completed on a timely basis to ensure that these adjustments are included in the reporting period ending June 30, 2013 (Quarter 2).

Review and Disposition of Lost Revenue Adjustment Mechanism (“LRAM”)

The Board’s *Guidelines for Electricity Distributor Conservation and Demand Management* (the “CDM Guidelines”) issued on April 26, 2012 outline the information that is required when filing an application for LRAM.

Milton Hydro filed a LRAM claim for 2010 OPA CDM programs persistent into 2011 and 2012 in the amount of \$107,762 including carrying charges of \$2,830. Milton Hydro proposed to recover the LRAM claim over a one-year period.

Board staff, in its submission, did not support Milton Hydro's request for recovery of an LRAM amount related to lost revenues in 2011 and 2012 from persisting impacts of 2010 CDM programs, in the amount of \$107,762 including carrying charges of \$2,830. Board staff submitted that Milton Hydro's request for LRAM is inconsistent with the Board's decision in Hydro One Brampton's 2012 IRM application (EB-2011-0174), where the Board disallowed LRAM claims for the rebasing year as well as persistence of prior year programs in and beyond the test year, on the basis that these savings should have been incorporated into the applicant's load forecast at the time of rebasing. Further, Board staff submitted that Milton Hydro's request is inconsistent with the 2012 CDM Guidelines, as Milton Hydro did not reflect the 2010 OPA CDM Program savings in its load forecast upon which 2011 rates were set, as the 2011 load forecast was based on actual data from 2001 to 2009. Board staff submitted that Milton Hydro had an updated load forecast approved in 2011 and that this load forecast is final in all respects. Board staff submitted that Milton Hydro's current LRAM request should be denied.

VECC submitted there was no explicit language in the complete Settlement Agreement or Decision (EB-2010-0137) for Milton Hydro's 2011 cost of service proceeding stating that CDM impacts were not included in the load forecast. VECC also submitted that Milton Hydro's rebased load forecast for 2011 approved by the Board is final in all respects and includes the CDM savings from 2010. As per the CDM Guidelines these savings should not be accruable in 2011 or beyond. VECC argued Milton Hydro's LRAM request is inconsistent with the Board's past and current CDM Guidelines and the Board's Decision in previous LRAM applications regarding similar requests. For these reasons, VECC submitted that Milton Hydro's LRAM request in this application should not be approved.

Milton Hydro replied that the 2010 OPA CDM program results were not available and therefore could not be included in Milton Hydro's load forecast. Milton Hydro also argued that its 2011 cost of service rate application (EB-2010-0137) did make it clear and obvious to all readers that Milton Hydro's load forecast was based on actual customer consumption and demand up to December 2009 and therefore there was no provision for 2010 Actual data and OPA CDM program reductions. Milton Hydro also submitted, the implementation of an LRAMVA clearly indicates that it is not the Board's intention to declare distributors load forecasts to be final in all respects. If distributors' load forecasts were final in all respects, as suggested by Board Staff and VECC, then there would be no requirement for the LRAMVA as there would not be any adjustments

allowed. Milton Hydro submits that its 2011 cost of service load forecast is not and cannot be declared final in all respects in order for Milton Hydro to adhere to the updated CDM Guidelines. As such, Milton Hydro's LRAM claim should be approved. While Board staff addressed a decision in Hydro One Brampton's 2012 IRM (EB-2011-0174) Milton Hydro notes that this continues to be an issue to Hydro One Brampton and is being addressed in its 2013 IRM reply submission (EB-2012-0135). Finally, Milton Hydro submitted that any decision other than approving Milton Hydro's LRAM claim and proposed rate riders is contrary to the Board's CDM Guidelines for the LRAM mechanism and the Board's commitment to keep distributors financially whole while implementing CDM programs.

Board Findings

Page 42 of Milton Hydro's evidence for 2011 rates states: "Milton Hydro's revenue forecast is based on the **forecasted** kWh, KW and customer counts for the 2010 Bridge Year and 2011 Test Year" ¹(emphasis added).

There is no mention in this portion of the evidence that the load forecast was based on actual customer consumption and demand. This in fact, would be inconsistent with a "forecast", which anticipates future loads, not actual loads from previous years. Milton Hydro, as an early implementer of CDM programs, should have been aware of the approximate potential forecast loss for 2011 as a result of conservation initiatives, even without the OPA report. Without an explicit statement that the 2011 forecast did not include the impact of CDM, which there is not, the Board finds that the 2011 forecast must have taken load loss as a result of CDM into consideration. Therefore, the Board finds that no LRAM is available for 2011 or 2012 to account for the persistent impact of CDM programs implemented in 2010.

Smart Meter Cost Recovery

Costs Incurred with Respect to Smart Meter Deployment and Operation

In the application, Milton Hydro sought the following approvals:

- A Smart Meter Incremental Revenue Requirement Rate Riders ("SMIRR") of \$0.31 per customer per month for the period of May 1, 2013 to April 30,

¹ EB2010-0137, page 42.

2015. These rate riders will collect the 2012 incremental revenue requirement related to smart meter costs to be incurred from January 1, 2012 to December 31, 2012, and in successive years until Milton Hydro rebases its rates through a cost of service application.

The smart meter costs for which Milton Hydro is seeking recovery in this application pertain to smart meters deployed since December 31, 2009; costs for smart meters deployed to that date, and the ongoing recovery of the capital costs and related OM&A expenses for these deployed meters which were reviewed and approved in Milton Hydro's 2011 cost of service application, EB-2010-0137.

In response to Board staff and VECC interrogatories, Milton Hydro withdrew its model and populated the Board Smart Meter Model Version 3.0 (Board staff IR # 13b and VECC IR# 5).

Milton Hydro filed a revised smart meter model and class-specific SMDRs and SMIRRs to reflect the updates noted in the Board staff and VECC interrogatories referenced above.

The revised class-specific SMDRs and SMIRRs calculated as a result of responses to Board staff and VECC interrogatories are summarized below:

Table 1: Original and Revised SMDRs and SMIRRs

Class	SMDR (\$/month, from May 1, 2013 to April 30, 2015)		SMIRR (\$/month, from May 1, 2013 to April 30, 2015)	
	Original	Revised	Original	Revised
Residential	\$0.00	\$0.05	\$0.31	\$0.08
GS <50 kW	\$0.00	(\$0.28)	\$0.31	\$0.07
GS >50 kW	\$0.00	\$0.00	\$0.31	\$0.00
Large Use	\$0.00	\$0.00	\$0.31	\$0.00

Prudence of Incurred Costs

Milton Hydro's costs in aggregate and on a per meter basis are summarized in the following table:

	EB-2010-0137	2010	2011	2012	2013	Total	
Capital	\$ 3,277,278	\$ 202,198	\$ 18,116	\$ -	\$ -	\$ 3,497,592	
OM&A	\$ 198,513	\$ 98,402	\$ 150,991	\$ -	\$ -	\$ 447,906	
Number of Smart Meters	20259	36	0	0	0	20,295	
							Total
							Average Per Meter
						Total (capex+opex)	\$ 3,945,498
						Capex Only	\$ 3,497,592
							\$ 194.41
							\$ 172.34

Both Board staff and VECC noted that Milton Hydro's costs per meter are within the ranges observed for other utilities in the combined proceeding related to smart meters conducted by the Board in 2007 (EB-2007-0063). Milton Hydro's costs are also below the sector average total cost of \$207.37 reported in the Board's *Sector Smart Meter Audit Review Report*, dated March 31, 2010 and the average total cost of \$226.92 reported by distributors in the Monitoring Report of Smart Meter Investment as at September 30, 2010.

The Board notes that authorization to procure and deploy smart meters has been done in accordance with Government regulations, overseen by the Fairness Commissioner, to select (a) vendor(s) for the procurement and/or installation of smart meters and related systems. There is thus a significant degree of cost control discipline that distributors, including Milton Hydro, are subject to in smart meter procurement and deployment.

The Board finds that Milton Hydro's documented costs, as revised in response to interrogatories and in Milton Hydro's reply submission, related to smart meter procurement, installation and operation, and including costs related to TOU rate implementation, are reasonable. As such, the Board approves the recovery of the costs applied for related to smart meter deployment and operation as of December 31, 2011, and the ongoing recovery of capital-related and operating expenses for 2012 and going forward until Milton Hydro's next cost of service application.

Level of Unaudited Costs

Milton Hydro's application complies with Guideline G-2011-0001 in that at least 90% of the smart meter costs sought for recovery are audited. VECC submitted that Milton Hydro's percentage of audited costs conforms to the Board's Guideline G-2011-0001.

The Board accepts Milton Hydro's Application as it is consistent the Board's policy and

practice as documented in Guideline G-2011-0001 in this regard.

Cost Allocation

Milton has calculated the class-specific smart meter revenue requirement using the following methodology:

- OM&A expenses have been allocated on the basis of the number of meters installed for each class;
- The Return and Amortization have been allocated on the basis of the capital costs of the meters installed for each class;
- PILS have been allocated based on the revenue requirement derived for each class before PILS; and
- Direct allocation by rate class of the SMFA revenue collected from the residential and GS < 50 kW rate classes (applicable only for the SMDR determination).

With the updated smart meter model filed in response to Board staff interrogatory # 13, the model calculates the following monthly SMDRs and SMIRRs:

	Uniform (Sheet 9)	Residential (Sheets 10A and 10B)	GS < 50 kW (Sheets 10A and 10B)
SMDR (in effect for 2 years)	\$0.03	\$0.05	(\$0.28)
SMIRR (in effect until Milton Hydro's next cost of service rates become effective)	\$0.08	\$0.08	\$0.07

While Board staff submitted that Milton Hydro's approach for allocating costs has been employed correctly, the results appear anomalous. Board staff submitted that this might be because the OM&A costs (\$252,308.55, out of a total of \$331,882.10, or over 75% of the deferred revenue requirement) were solely allocated to the Residential class, as the 36 new smart meters that were installed in 2010 were for that class.

However, Milton Hydro's evidence in the application and in response to interrogatories indicates that much of the capital costs and the OM&A costs have been for the installation and operation of additional repeaters and collectors to improve remote meter reading. These costs are therefore for common infrastructure used to serve all customers with smart meters. Board staff submitted that allocating 100% of the OM&A expenses to Residential customers is inappropriate in these circumstances. This is not

an error in Milton Hydro's approach, but is due to the fact that this application deals solely with a small residual amount and is a situation for which the Board-issued Smart Meter Model was not fully designed to handle.

Given the "common" nature of many of these costs, and given that the costs at issue in this application are only a small fraction of Milton Hydro's overall costs (the bulk of which have already been disposed) Board staff submitted that a uniform SMDR and SMIRR as calculated on sheet 9 of the Smart Meter Model would be preferable. For the SMIRR, there is no material difference between the uniform and allocated SMIRRs. For the SMDR, Board staff submits that a uniform SMDR of \$0.03 per month for the Residential and GS < 50 kW would be a more appropriate recovery of the costs on a cost causality basis, as opposed to the class-specific calculation which would see a refund of \$0.28 per month to GS < 50 kW, even though the OM&A costs would also be used to service customers in this class.

VECC submitted that since this application included only costs to install 36 smart meters for the residential class in 2010, Milton Hydro should have the data available at the customer level to appropriately allocate costs between customer classes and complete separate smart meter models and revenue requirements for each customer class. VECC also submitted Milton Hydro should provide, in its reply submissions, the information requested by VECC in IR#5, i.e. class specific revenue requirement models and revised SMDR and SMIRR rate riders based on full cost causality.

In the past the Board has noted that the principle of cost causality would support class-specific cost recovery, as there would be differing costs in different customer classes, due in large part to the costs of the meters themselves, and to the extent that accurate data was available from the utility's records. To this end, the Board's Guideline² indicates that a utility is expected to address the allocation of costs in its application seeking the disposition of smart meter costs recorded in accounts 1555 and 1556. In recent decisions, the Board has reviewed and approved an evolution of approaches for calculating class-specific rate riders.³

² On December 15, 2011, the Board issued *Guideline G -2011-0001: Smart Meter Funding and Cost Recovery – Final Disposition* ("Guideline G-2011-0001").

³ The Board's decisions with respect to PowerStream Ltd.'s 2010 and 2011 smart meter applications (respectively, EB-2010-0209 and EB-2011-0128) confirmed approaches for allocating costs and calculating class-specific rate riders for recovery of smart meter costs. The approach approved in Decision EB-2011-0128, or an analogous or improved approach is expected where data of adequate quality at a class level is available.

The Board considers the cost causality approach of class-specific models proposed by VECC to be more exacting and principled, and will accept it where the utility has calculated it and is reasonably confident with the underlying data at the customer class level. However, Milton Hydro submitted that a uniform SMDR and the SMIRR as calculated on Sheet 9 of the model and proposed by Board Staff is the appropriate method for recovery of Milton Hydro's remaining smart meter costs.

The Board approves Milton Hydro's methodology and the resulting SMDRs and SMIRRs as calculated in response to Board staff interrogatory # 13 to recover the historical and prospective revenue requirement on the approved smart meter costs.

Accounting Matters

In granting its approval for the historically incurred costs and the costs projected for 2012, the Board considers Milton Hydro to have completed its smart meter deployment. Going forward, no capital and operating costs for new smart meters and the operations of smart meters shall be tracked in Accounts 1555 and 1556. Instead, costs shall be recorded in regular capital and operating expense accounts (e.g. Account 1860 for meter capital costs) as is the case with other regular distribution assets and costs.

Milton Hydro is authorized to continue to use the established sub-account Stranded Meter Costs of Account 1555 to record and track remaining costs of the stranded conventional meters replaced by smart meters. The balance of this sub-account should be brought forward for disposition in Milton Hydro's next cost of service application.

Rate Model

With this Decision, the Board is providing Milton Hydro with a rate model (spreadsheet) and applicable supporting models and a draft Tariff of Rates and Charges (Appendix A) that reflects the elements of this Decision. The Board has reviewed the entries in the rate model to ensure that they are in accordance with the 2012 Board approved Tariff of Rates and Charges and the rate model was adjusted, where applicable, to correct any discrepancies.

THE BOARD ORDERS THAT

1. Milton Hydro Distribution Inc.'s new distribution rates shall be effective May 1, 2013.
2. Milton Hydro Distribution Inc. shall review the draft Tariff of Rates and Charges set out in Appendix A. Milton Hydro Distribution Inc. shall file with the Board a written confirmation assessing the completeness and accuracy of the draft Tariff of Rates and Charges, or provide a detailed explanation of any inaccuracies or missing information within **7 days** of the date of issuance of this Decision and Order.
3. If the Board does not receive a submission from Milton Hydro Distribution Inc. to the effect that inaccuracies were found or information was missing pursuant to item 2 of this Decision and Order, the draft Tariff of Rates and Charges set out in Appendix A of this Decision and Order will become final, effective May 1, 2013, and will apply to electricity consumed or estimated to have been consumed on and after May 1, 2013. Milton Hydro Distribution Inc. shall notify its customers of the rate changes no later than with the first bill reflecting the new rates.
4. If the Board receives a submission from Milton Hydro Distribution Inc. to the effect that inaccuracies were found or information was missing pursuant to item 2 of this Decision and Order, the Board will consider the submission of Milton Hydro Distribution Inc. and will issue a final Tariff of Rates and Charges.

Cost Awards

The Board will issue a separate decision on cost awards once the following steps are completed:

1. The Vulnerable Energy Consumers Coalition shall submit their cost claims no later than **7 days** from the date of issuance of the final Rate Order.
2. Milton Hydro Distribution Inc. shall file with the Board and forward to the Vulnerable Energy Consumers Coalition any objections to the claimed costs within **21 days** from the date of issuance of the final Rate Order.

3. The Vulnerable Energy Consumers Coalition shall file with the Board and forward to Milton Hydro Distribution Inc. any responses to any objections for cost claims within **28 days** from the date of issuance of the final Rate Order.
4. Milton Hydro Distribution Inc. shall pay the Board's costs incidental to this proceeding upon receipt of the Board's invoice.

All filings to the Board must quote file number **EB-2012-0148**, be made through the Board's web portal at, <https://www.pes.ontarioenergyboard.ca/eservice/> and consist of two paper copies and one electronic copy in searchable / unrestricted PDF format. Filings must clearly state the sender's name, postal address and telephone number, fax number and e-mail address. Parties must use the document naming conventions and document submission standards outlined in the RESS Document Guideline found at www.ontarioenergyboard.ca. If the web portal is not available parties may email their document to BoardSec@ontarioenergyboard.ca. Those who do not have internet access are required to submit all filings on a CD in PDF format, along with two paper copies. Those who do not have computer access are required to file 2 paper copies.

DATED at Toronto, April 4, 2013

ONTARIO ENERGY BOARD

Original signed by

Kirsten Walli
Board Secretary

Appendix A

To Decision and Order

Draft Tariff of Rates and Charges

Board File No: EB-2012-0148

DATED: April 4, 2013

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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

EB-2012-0148

RESIDENTIAL SERVICE CLASSIFICATION

This classification refers to the supply of electrical energy to detached, semi-detached and townhouse residential buildings as defined in local zoning bylaws. A residential service is a single-family unit used for domestic or household purposes, including seasonal occupancy. At Milton Hydro's discretion, residential rates may be applied to apartment buildings with 6 or less units by simple application of the residential rate by blocking the residential rate by the number of units. Further servicing details are available in the distributor's Conditions of Service.

Where the residential dwelling comprises the entire electrical load of a farm, it is defined as a residential service. Where the residential dwelling does not comprise the entire electrical load of the farm:

- The service will be defined as a General Service if the occupant derives his/her principal livelihood from the working of the farm;
- The service will be defined as a Residential Service if the occupant does not derive his/her principal livelihood from the working of the farm;
- Where the residential farm dwelling is supplied by one separately metered service and the electrical loads in other buildings are supplied by a different separately metered service, then the former is defined as a Residential Service and the latter is defined as a General 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	\$	15.00
Rate Rider for Disposition of Residual Historical Smart Meter Costs - effective until April 30, 2015	\$	0.03
Rate Rider for Recovery of Smart Meter Incremental Revenue Requirement - effective until the date of the next cost of service-based rate order	\$	0.08
Rate Rider for Smart Metering Entity Charge - effective until October 31, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0140
Low Voltage Service Rate	\$/kWh	0.0002
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kWh	0.0001
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kWh	0.0043
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0072
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0053

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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

EB-2012-0148

RESIDENTIAL SERVICE CLASSIFICATION**MONTHLY RATES AND CHARGES - Regulatory Component**

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION

This classification refers to a non-residential customer with an average peak demand below 50 kW over the past twelve months. For a new customer without prior billing history, the peak demand will be based on the customer's proposed capacity. 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	\$	15.97
Rate Rider for Disposition of Residual Historical Smart Meter Costs - effective until April 30, 2015	\$	0.03
Rate Rider for Recovery of Smart Meter Incremental Revenue Requirement - effective until the date of the next cost of service-based rate order	\$	0.08
Rate Rider for Smart Metering Entity Charge - effective until October 31, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0170
Low Voltage Service Rate	\$/kWh	0.0002
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kWh	0.0002
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kWh	0.0043
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0066
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0047

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

GENERAL SERVICE 50 TO 999 KW SERVICE CLASSIFICATION

This classification refers to a non-residential customer with an average peak demand equal to or greater than 50 kW and less than 1,000 kW over the past twelve months. For a new customer without prior billing history, the peak demand will be based on the customer's proposed capacity. 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.

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MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	75.81
Distribution Volumetric Rate	\$/kW	2.5259
Low Voltage Service Rate	\$/kW	0.0792
Minimum Distribution Charge – per KW of maximum billing demand in the previous 11 months	\$/kW	0.5713
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kW	0.0614
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kW	1.5689
Retail Transmission Rate - Network Service Rate	\$/kW	2.9715
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	2.1934

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

GENERAL SERVICE 1,000 TO 4,999 KW SERVICE CLASSIFICATION

This classification refers to a non-residential customer with an average peak demand equal to or greater than 1,000 kW and less than 5,000 kW, regardless of when the demand occurs, averaged over twelve months. For a new customer without prior billing history, the peak demand will be based on the customer's proposed capacity. 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	\$	874.23
Distribution Volumetric Rate	\$/kW	2.7588
Low Voltage Service Rate	\$/kW	0.0779
Minimum Distribution Charge – per KW of maximum billing demand in the previous 11 months	\$/kW	0.5713
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kW	0.0838
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kW	2.0771
Retail Transmission Rate - Network Service Rate	\$/kW	2.9225
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	2.1576

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

LARGE USE SERVICE CLASSIFICATION

This classification refers to a non-residential customer with an average peak demand equal to or greater than 5,000 kW, regardless of when the demand occurs, averaged over twelve months. For a new customer without prior billing history, the peak demand will be based on the customer's proposed capacity. 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	\$	3,650.64
Distribution Volumetric Rate	\$/kW	2.1856
Low Voltage Service Rate	\$/kW	0.0871
Minimum Distribution Charge – per KW of maximum billing demand in the previous 11 months	\$/kW	0.5713
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kW	0.0389
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kW	1.9326
Retail Transmission Rate - Network Service Rate - Interval Metered	\$/kW	3.1647
Retail Transmission Rate - Line and Transformation Connection Service Rate - Interval Metered	\$/kW	2.4130

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION

This classification refers to the supply of electricity to unmetered loads less than 50 kW including traffic signals and pedestrian X-walks signals/beacons, bus shelters, telephone booths, signs, Cable TV amplifiers and decorative lighting and tree lighting connected to Milton Hydro's distribution system, and similar small unmetered loads. 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)	\$	7.64
Distribution Volumetric Rate	\$/kWh	0.0162
Low Voltage Service Rate	\$/kWh	0.0002
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kWh	(0.0001)
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0066
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0047

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

SENTINEL LIGHTING SERVICE CLASSIFICATION

This classification refers to all services supported to supply sentinel lighting equipment. 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)	\$	2.37
Distribution Volumetric Rate	\$/kW	17.9504
Low Voltage Service Rate	\$/kW	0.0544
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kW	(0.0395)
Retail Transmission Rate - Network Service Rate	\$/kW	2.0228
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	1.5064

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

STREET LIGHTING SERVICE CLASSIFICATION

This classification refers to all services supplied to street lighting equipment owned by or operated for a municipality or the Province of Ontario. 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 (per connection)	\$	1.98
Distribution Volumetric Rate	\$/kW	8.6819
Low Voltage Service Rate	\$/kW	0.0532
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2014	\$/kW	0.0656
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2014		
Applicable only for Non-RPP Customers	\$/kW	1.5099
Retail Transmission Rate - Network Service Rate	\$/kW	2.0125
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	1.4755

MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0012
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
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EB-2012-0148

microFIT 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

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MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	5.40
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Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
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EB-2012-0148

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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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, charges for the Ministry of Energy Conservation and Renewable Energy Program, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

Customer Administration

Arrears certificate	\$	15.00
Statement of Account	\$	15.00
Easement Letter	\$	15.00
Credit Reference/credit check (plus credit agency costs)	\$	15.00
Account set up charge/change of occupancy charge (plus credit agency costs if applicable)	\$	30.00
Returned cheque (plus bank charges)	\$	15.00
Special meter reads	\$	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 Charges for non payment of account - At Meter During Regular Hours	\$	65.00
Disconnect/Reconnect Charges for non payment of account - At Meter After Hours	\$	185.00

Optional Interval/TOU Meter charge \$/month	\$	5.50
Specific Charge for Access to the Power Poles - \$/pole/year	\$	22.35
Clearance Pole Attachment charge \$/pole/year	\$	5.59

Milton Hydro Distribution Inc.
TARIFF OF RATES AND CHARGES
Effective and Implementation Date May 1, 2013

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EB-2012-0148

RETAIL SERVICE CHARGES (if applicable)

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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	1.0362
Distribution Loss Factor - Secondary Metered Customer > 5,000 kW	1.0149
Distribution Loss Factor - Primary Metered Customer < 5,000 kW	1.0258
Distribution Loss Factor - Primary Metered Customer > 5,000 kW	1.0048