

August 15, 2013

Ms. Kirsten Walli  
Ontario Energy Board  
PO Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, Ontario M4P 1E4

**Re: Consultation on Proposed Revisions to Regulated Price Plan Manual: Changes to the Calculation of the Final Variance Settlement Amount for Consumers that Leave the Regulated Price Plan (EB-2013-0273)**

Dear Ms. Walli,

Entegrus Powerlines Inc. (“Entegrus”) is appreciative of the opportunity to provide comments in relation to the Board’s proposed revisions to the final RPP variance settlement amount (“FVSA”). Entegrus supports the adoption of the proposed revisions to the FVSA calculation methodology as described within the Board’s letter dated August 2, 2013 (the “Letter”). Entegrus believes that the new methodology effectively mitigates the risk of cross subsidization/charges between RPP and non-RPP customers.

Entegrus notes that the revised calculation methodology contains one potential limitation. This relates to customers who move from one distributor service territory to another. Particularly, RPP customers who relocate to a new service territory and depart RPP supply within 12 months would be unduly penalized. This would occur because the successor distributor (the “Successor”), unless otherwise notified from the previous distributor, would be left to infer on the customer’s previous RPP status. This inference could result in the Successor concluding that the Final Settlement Consumption Period was for a continuous period of less than 12 months, resulting in a lower charge or credit.

Entegrus agrees that distributors, in consultation with their Customer Information System service providers, should be able to administer the revised FVSA calculation. Entegrus respectfully requests that the Board grant distributors up to a two month transition period to properly integrate and test the accuracy of the revised calculation methodology.



All of which is respectfully submitted,

*[Original Signed By]*

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Dan Charron, President – Entegrus Powerlines Inc.  
Chris Cowell, Chief Financial & Regulatory Officer  
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