



Lakefront Utilities Inc.

October 18, 2023

Ms Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
PO Box 2319
Toronto, ON, M4P 1E4

Dear Ms. Marconi,

RE: Ultra-Low Overnight Time of Use Pricing Lakefront Utilities Inc. – Exemption Request EB-2022-0160

The Standard Supply Service code requires electricity distributors to provide eligible customers the option to elect to be charged on the basis of ultra-low overnight time-of-use pricing (ULO) for any billing period that begins on or after November 1, 2023.

Recently Lakefront Utilities Inc. (LUI) has been challenged with balancing ongoing regulatory requirements with daily operational responsibilities due to two senior staffing changes. In the past two months Lakefront has seen its Manager, Customer Billing as well as the Vice President, Finance (CFO) resign.

Lakefront, being a small utility in essence, lost significant internal knowledge of the substance of the ULO implementation changes to the billing system. Lakefront has recently promoted an internal candidate to the position of Manager, Customer Billing. Lakefront has also retained two retired individuals well versed in finance and regulatory aspects of the Ontario Electrical Industry as transition personnel to aid in assisting in the replacement of CFO functions.

Currently, however Lakefront is not fully able to state with certainty that the OEB requirement for November 1, 2023, implementation will be met with any degree of comfort. Lakefront is committed to endeavouring to meet the implementation requirement. Lakefront wishes to advise the OEB of this situation.

Please do not hesitate to contact me to request any further information.

Respectfully submitted,

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