



3240 Mavis Road
Mississauga, Ontario
L5C 3K1

Tel: (905) 273-9050
Fax (905) 566-2737

March 16, 2011

By RESS and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P. O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**RE: Amendment to Application for Adjustment to Mandated Time-of-Use
End Date
EB-2011-0028**

Background

On January 27, 2011, Enersource Hydro Mississauga Inc. ("Enersource") filed an application (the "Application") seeking an adjustment to Enersource's mandatory Time-of-Use ("TOU") date pursuant to Board File EB-2010-0218. Specifically, Enersource requested that the Ontario Energy Board (the "Board") adjust Enersource's mandatory TOU end date from August, 2011, such that all conversions to TOU pricing were to be concluded by the end of May, 2012.

On February 25, 2011, the Board published a Notice of Application and Written Hearing (the "Notice"). Among other things, the Notice described the Application as Enersource seeking an exemption from the June, 2011 TOU date and requesting a new TOU date of May, 2012 due to concerns with the time required in implementing TOU pricing with respect to demands on call centre response handling as well as the high risk of errors in converting such a large number of customers to TOU billing in a short period of time.

Enersource refers the Board to its acknowledgement in EB-2010-0218 that distributors might encounter extraordinary and unanticipated circumstances

during the implementation of TOU pricing and requested that distributors bring these matters to the Board's attention in order to assess the impact on the distributor's mandatory TOU date and whether any adjustment in that date is warranted.

Amendment to the Application

Enersource hereby brings to the Board's attention the fact that three prerequisite conditions for Enersource to be able to complete implementation of TOU rates by May, 2012 have not yet materialized. Specifically,

- the provincial Meter Data Management/Repository (the "MDM/R") is not yet stable; Enersource has built its interface systems to be compatible with version 7.0 of the MDM/R which has not yet been available for Enersource to begin enrollment testing; it would be imprudent for Enersource to conduct enrollment testing with a version of the MDM/R soon to be superseded;
- the Smart Metering Entity agreement between the IESO and Enersource has not yet been executed and, as such, represents an unquantifiable risk; and
- a comprehensive resolution of the issue of smart meter compliance with Measurement Canada ("MC") legislation has not been reached. Enersource has determined that it is an unacceptable business risk to operate in non-compliance with MC regulations.

The resolution of these conditions is outside of Enersource's control, but we continue to monitor and try to positively influence their progress.

Adjusted Mandatory TOU Date

For the reasons explained above, Enersource requests that the Board approve an indefinite exemption for both Enersource's mandatory TOU date, as well as the date by which TOU billing must be completed.

If you have any questions please do not hesitate to contact the undersigned.

Sincerely,

Original Signed by:

Gia M. DeJulio
Director, Regulatory Affairs
gdejulio@enersource.com
905-283-4098

cc. Dan Pastoric, Executive Vice-President and Chief Operating Officer
Tom Wasik, Director, Strategic Projects