



RECEIVED

OCT 12 2006

ONTARIO ENERGY BOARD

October 11, 2006

Kirsten Walli, Board Secretary  
Ontario Energy Board  
PO Box 2319,  
2300 Yonge St, Suite 2700  
Toronto, Ontario, M4P 1E4

**Re: Distribution System Code and Retail Settlement Code Amendments – (EB-2006-0226)**

In regard to proposed amendments to the Distribution System Code and Retail Settlement Code for the connection of embedded generation facilities, London Hydro Inc. has the following comments.

**Section 6.2.9.2 of the DSC** – London Hydro assumes the reference to “15 days” is 15 working days. Please confirm and adjust wording to clarify.

**Section 9 of the Connection Agreement** – Discusses a valid certificate of insurance. It must be clear that this is an ongoing condition of connection.

Does the lapse of insurance constitute a “material breach” as outlined in section 19.3 of the connection agreement?

Is the 60 days disconnection notice to long to operate without proper insurance coverage?

Clarification of the penalties associated with a lapse in insurance coverage is required.

**Section 14.2 of the Connection Agreement** – An added section worded similar to the following is a necessity “The customer will not be compensated or reimbursed by the Distributor for any lost revenue associated with lost generation opportunities caused by a Distributor’s outage, regardless of planned or unplanned or the outage duration.” to ensure the utility remains financially whole.

**Section 20.7 of the Connection Agreement** – Regarding errors in the original connection agreement, a new section is required worded similar to the following “If the change or error results in an adverse deviation from the existing connection agreement, a new connection study and agreement may be required”.

If you require any further information, please contact me directly.

Sincerely,

Ian McKenzie  
Regulatory Analyst  
Bus. (519) 661-5800 ext. 5579  
Fax (519) 661-2596  
[mckenziei@londonhydro.com](mailto:mckenziei@londonhydro.com)