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June 6, 2006

Peter O'Dell
Assistant Board Secretary
Ontario Energy Board
PO Box 2319
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2300 Yonge Street
Toronto ON M4P 1E4

Dear Mr. O'Dell:

RE: Cost Allocation Review: Staff Proposal Regarding Rate Classifications and Associated Load Data Requirements
File Number EB-2005-0317

In accordance with your letter dated May 26, 2006, the following are the written comments of Paula Zarnett on behalf of the Canadian Cable Telecommunications Association ("CCTA") and Rogers Cable Communications Inc. ("Rogers").

Rogers is an integrated cable and communications company that receives electricity for its power supplies from local distribution companies ("distributors" or "LDCs") throughout Ontario. Other cable and communications companies, some of whom are members of CCTA, similarly receive electricity for their power supplies from the LDCs in whose service territories they operate. Most LDCs serve cable power supplies as an unmetered scattered load ("USL"). Rogers and CCTA therefore have an interest in the treatment which USL receives in the cost allocation informational filings.

1. Staff has proposed that Run 1 not treat USL as a separate rate class, unless a separate rate class or subclass was intended in the distributor's 2006 approved rates. The overall load shape for the GS<50 kW rate classification would therefore be applied to USL in Run 1 by the distributors that do not have a separate rate class or subclass for USL in their 2006 approved rates.

   Rogers and CCTA believe that this approach provides the Board with a good foundation for understanding the changes that would result from treatment of USL as a separate class, and therefore supports this recommendation.

2. Staff has set out that the planned rate classifications to be modeled in Run 2 include the introduction of a full separate rate class for Unmetered Scattered Loads.

   Rogers and CCTA believe that this appropriately reflects the direction of the Board for this cost allocation review.

3. Staff has proposed that a deemed load profile, constructed from the combined load shapes of each type of load included in the USL class, be constructed. It is our understanding that the load shapes of each type of load would be consistent among distributors, but that the total load shape would vary amongst distributors based on the proportion that each type of load represents of the total USL for that distributor.

Rogers and CCTA believe that this approach provides a good basis for the available data on each type of USL connection to be reflected in the load shapes of each distributor, and therefore supports this recommendation.

4. Staff has proposed a single separate USL rate classification, to include both photo-sensitive and non-photo-sensitive loads.

Rogers and CCTA concur that this approach to classification will achieve its stated goal of simplicity in rate classification.

5. Staff has proposed that the total kWh consumption of each type of unmetered scattered load for purposes of development of the utility-specific load shape and demand allocators will be the kWh consumption estimate used by the distributor for billing purposes in the test year. Staff has indicated in its proposal that this approach is being adopted in the absence of better data at this time.

Rogers and CCTA support this approach for purposes of the current informational filings. For the longer term, we believe it is in the interest of all electricity customers for a consistent approach to estimation of USL consumption to be developed. We believe that in the case of cable power supplies and battery mats, such an approach will produce estimates that have only a small margin of error in either direction, when supported by field verification and good record maintenance, thus confirming that the expense associated with metering is unnecessary.

Rogers has worked extensively with individual LDCs in recent years to: (1) improve understanding of the electricity usage of its connections; (2) develop load estimation and monitoring approaches that are acceptable to the LDC and the customer; (3) confirm that consumption by USL customers can be fairly, accurately and reasonably estimated; and (4) demonstrate that there is no justification for imposing unnecessary metering costs on USL customers.

It is our hope that these efforts will have the support of the Board, and the continued support of LDCs as the cost allocation methodology develops over time. It is also our hope that no steps will be taken that would undermine the process that the Board began in EDR 2006 (RP-2004-0188) and which continues in this cost allocation proceeding to: (1) develop an accurate, fair and consistent approach to treatment and estimation of USL consumption; and (2) properly assess the recommendation in the September 2005 Board

Staff Discussion Paper that a new class be created for unmetered scattered load.

6. Staff has proposed that those LDCs with battery mat load in the test year should obtain information on the number and installed capacity of battery mats from the local cable company.

   As the only cable company currently installing battery mats, Rogers is pleased to support these efforts by providing the necessary data, and recommends that the approach developed to create a load shape for battery mats be accepted by the Board.

7. Staff has proposed that distributors using a 2004 test year make no adjustment for battery mats, since no battery mats were in use in Ontario prior to 2005.

   Rogers and CCTA recommend that this proposal be accepted by the Board. The recommended approach reflects the load in the LDCs in the test year, and is consistent with the proposed approach to loads in all customer classes for the informational filings.

8. Staff has proposed that the approaches to the load and load shape for non-photo-sensitive USL, battery mats, and photo-sensitive USL be used by all distributors in Run 2 of the model, and by those distributors in Run 1 of the model where the approved 2006 rates treat USL as a separate rate class. For most distributors Run 1 should treat USL as part of the GS<50 kW rate classification.

   Rogers and CCTA support this proposal.

Rogers and CCTA thank the Board for the opportunity to participate in this process and to offer views on Staff's proposals. We commend Staff and the stakeholders involved in Phase 3 of the Cost Allocation Review initiative for their efforts.

On behalf of Rogers and CCTA,

Paula Zarnett per

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