



September 14, 2005

Mr. John Zych Board Secretary Ontario Energy Board Box 2319, 2300 Yonge Street 26th Floor Toronto, ON M4P 1E4

Dear Mr. Zych:

Re: Cost Allocation Review Project #EB-2005-0317

The Regional Municipality of York (York Region) would like to bring a number of items relating to street and traffic lighting to the Boards attention for consideration in the upcoming Cost Allocation Review process.

As noted in our letter dated February 2, 2005, York Region affirms the proposed interim solution presented in Section 10.2 of the Electricity Distribution Rate Handbook. However, the interim solution only addresses traffic signals, and appears to have left out street lights. Distributors in York Region also apply customer service charges for street lights on a per connection point basis. To summarize the issue, the letter states the following: "We feel that Section 10.2 Part 2 should be expanded in two ways as follows:

- 1. The application of any monthly service charge on a per connection point basis, not just the General Service <50kW monthly service charges, should warrant inclusion under Part 2.
- 2. An LDC applying elevated distribution rates in place of monthly service charges should reduce these to the General Service <50kW distribution rates."

The Region would like to see the issue of variability and inconsistency among distributors as it relates to traffic signals and street lights be addressed in the upcoming Cost Allocation Review process. Ultimately the Region would like to see distributors apply one monthly service charge equal to the small commercial service charge to all unmetered locations.

Thank you for your consideration to this matter.

Sincerely,

Tracey Forrest

Manager, Corporate Energy Services

TF/MJ

Copy to: Barry Crowe, Director, Property Services