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BY COURIER

March 1, 2011

Ms. Kirsten Walli
Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, ON., M4P 1E4

Dear Ms. Walli

EB-2011-0021 - Hydro One Remote Communities Inc Request for an Exemption from Specific DSC Amendments – Application and Evidence Update Filing

I am attaching two (2) paper copies of the Hydro One Remote Communities Inc.'s ("Remotes") updated Application for exemptions to certain sections of the Distribution System Code that was filed with the Board on December 23, 2010.

As discussed with Board staff on February 9, 2011, the Application includes a brief description of the unique nature of Remotes' service area and customers, as well as describing how the current collection practices are meeting the needs of its customers. The Application also includes requests for exemption from eight sections of the current DSC that have been grouped into the categories of Payment Arrangements, Opening and Closing of Accounts and Standard Timelines. There is also a section discussing Future Considerations where Remotes describes the need for exemptions from specific sections in the proposed code amendments from the EB-2007-0722 Notice dated February 8, 2011.

Due to the unique nature of Remotes' customer base and service territory, Remotes is unable to follow standard practices for customer collections plus the timelines established in the DSC do not give customers in its service territory sufficient notice. Hydro One Remote Communities Inc. ("Remotes") supports the intent of these changes and believes that its existing collection practices are designed to meet the intent of the Board's Distribution System Code. Given the many areas where Remotes requires exemptions from the Code, Remotes requests that the Board consider exempting Remotes from the DSC.

Please direct any questions relating to this application to the undersigned at 416 345-6408 or ruth.greey@HydroOne.com.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK
Susan Frank

1 **1. INTRODUCTION**

2
3 On July 2, 2010, the Ontario Energy Board (“the Board”) amended the Distribution
4 System Code (“the DSC”) to introduce changes designed to reduce customer
5 disconnections by requiring distributors to offer customers flexible payment options and
6 more time and opportunity to make bill payments. Hydro One Remote Communities Inc.
7 (“Remotes”) supports the intent of these changes and believes that its existing collection
8 practices are designed to meet the intent of the Board’s changes to the DSC. However,
9 due to the unique nature of Remotes’ customer base and service territory, Remotes is
10 unable to follow standard practices for customer collections without incurring
11 significantly increased costs. Remotes is also concerned that the timelines established in
12 the DSC will not give customers in its service territory sufficient notice and will
13 negatively impact Remotes’ ability to work with local Band Councils and communities to
14 collect overdue accounts. Remotes therefore requests exemptions from the following
15 Sections of the DSC:

- 16 • Section 2.7.1.2 Payment Arrangement Down Payment of up to 15%
- 17 • Section 2.7.2 Minimum Length of Payment Arrangements
- 18 • Section 2.8.1 Opening and Closing of Accounts, customer confirmation in writing
- 19 • Section 4.2.2.3 Expiry of notice
- 20 • Section 4.3.3.1 (a) Deemed Date of Delivery of Notice
- 21 • Section 6.1.2.1 Agreement in Writing
- 22 • Section 6.1.2.2 Verbal Agreement
- 23 • Section 7.10 Reconnection Standards

1 **2. BACKGROUND: HYDRO ONE REMOTE COMMUNITIES**

2
3 A wholly-owned subsidiary of Hydro One Inc., Remotes was incorporated in August
4 1999. Remotes is licensed (ED 2003-0037 and EG-2003-0138) to generate and distribute
5 electricity within 21 communities in Northern Ontario. Remotes is 100% debt-financed
6 and is operated to break even, with a net income of zero based on actual results. Due to
7 the lack of grid connection, Remotes generates its own electricity to fulfill its obligations
8 under Section 29 of the *Electricity Act, 1998*.

9
10 The communities Remotes serves are small and isolated, scattered across roughly half of
11 Ontario's land mass. A list of the communities and map of the service territory are
12 located at Appendix A. Fifteen communities are First Nation reserves, and the other six
13 are provincial communities, located mainly along the CN Rail line. The smallest
14 communities have fewer than 40 customers, the largest fewer than 500. In total, Remotes
15 serves approximately 3,500 residential, small commercial, government and seasonal
16 customers.

17
18 Due to their isolation and the vast distances that separate them, the cost to serve these
19 communities is high. Thirteen communities are accessible only by air for most of the
20 year. As a result, transportation of fuel, equipment and staff are a key driver in Remotes'
21 costs. In order to manage the high cost of transportation, Remotes plans its work to take
22 advantage of winter roads to move equipment and fuel, and coordinates its field
23 operations to reduce the number of flights required by staff. To do this, work is bundled
24 to reduce the transportation costs. For example, distribution connections, service
25 disconnections, layouts and collection activities are not generally performed as single
26 items of work, but are grouped together into a single trip.

27
28 The communities' isolation limits economic opportunities. Most of Remotes' customers
29 are economically disadvantaged and are low income. Unemployment is high and, for

1 community members in the work force, employment opportunities are mainly part-time
2 or seasonal. The inaccessibility of the communities means that cost of goods for
3 residents is high. Gasoline, construction materials for homes, cars and groceries must all
4 be transported over winter roads or by plane. A carton of milk can cost \$14, and fresh
5 fruit and vegetables are luxuries. Residents continue to have a close attachment to the
6 land, and rely on the traditional spring and fall hunts for much of their food. The Band
7 Office and other community services are closed to accommodate the broad participation
8 of community members in the traditional hunts.

9
10 Some communities do not have post offices. In these communities, mail is delivered to
11 “neighboring” communities and is intermittently flown into the communities. Where
12 post offices do exist, mail is flown in more regularly; but even in communities with
13 regular mail service, mail can be delayed if planes cannot land due to fog or inclement
14 weather. Internet and telephone banking are available, but residents must fly out of the
15 communities to set up bank accounts. As a result, approximately 40 per cent of Remotes’
16 customers do not have bank accounts. Most communities have Northern Stores, which
17 sell a broad range of products and also operate as quasi-banks, cashing cheques for
18 residents and offering prepaid credit cards for sale. Only about half of Remotes’
19 customers have telephones. Although community residents without telephone services
20 can make phone calls from the Band Office, and messages can be left at the Band Office
21 for residents, it is not possible to easily reach many residents by phone.

22
23 To keep rates for residential and commercial services comparable to rates paid in the rest
24 of the Province, rates for residential and commercial customers are subsidized in three
25 ways: through Rural or Remote Rate Protection monies, accounting for approximately
26 two-thirds of Remotes Revenues; through a cross-subsidy from Standard A or
27 Government customer rates, which are set above the average cost of service; and through
28 capital funding from Indian and Northern Affairs Canada, which pays for the cost of new
29 electrical infrastructure on remote First Nation Reserves.

1 **3. HYDRO ONE REMOTE COMMUNITIES' COLLECTION PRACTICES**
2

3 Remotes has developed collection practices that respond to the needs of its customers and
4 the unique challenges posed by the isolation of its service territory. Over the past seven
5 years, Remotes has reduced outstanding residential arrears from \$3.2M in December of
6 2003 to \$0.8M in December of 2010. The aging profile of accounts receivable has also
7 improved significantly: in December 2003, 63% of arrears were older than 119 days,
8 whereas in December 2010, only 16% of arrears are older than 119 days. A detailed table
9 of Remotes' Aging Accounts Receivable from 2003-2010 can be found at Appendix B.
10

11 To reduce the transportation cost associated with collection and disconnection activities,
12 trips are organized by community. As permitted by Section 13.2(d) of its Distribution
13 licence, Remotes works closely with local Band Councils and local Social Assistance
14 Offices when planning and undertaking collection trips. Working with the local
15 community is required, as Band Councils have the legal right to bar outside parties from
16 reserve. Working closely with the Band Council also ensures that customers have
17 opportunities to access available community support and that the local government can
18 advise Remotes of sensitive situations such as Elders or cases of particular hardship.
19 Many customers do not pay their bills during the winter months, but Remotes does not
20 disconnect electricity services during the winter months because of the harsh winter
21 conditions.
22

23 Service disconnection trips are undertaken from April to October and are scheduled in
24 January of each year. In February, initial notices for collection trips are sent to
25 individuals in arrears and to the local Band Council. Early notification ensures that
26 customers receive the notices before trips begin in April despite potential delays in mail.
27 The initial notices encourage customers to make payment arrangements by calling
28 Remotes' billing staff. The notices also inform customers that payment arrangements
29 must be made by the Friday before the disconnection trips to avoid a service

1 disconnection, as field staff are not authorized to make payment arrangements.
2 Additional notices are sent at regular intervals leading up to the trip. If other customers
3 fall behind in their payments, they too are sent notices and are included in updated lists
4 sent to the Band office and the Social Service office on reserve. If customers enter into
5 payment arrangements and make payments leading up to the date of the trip, they are not
6 disconnected. Those who default on payment arrangements remain on the disconnection
7 list.

8
9 One month prior to the trip, reminder letters are sent to customers who have not yet
10 contacted the office to make payment arrangements. A letter and disconnection list, are
11 faxed to the First Nation Chief and Council and to the local Social Services office. A
12 poster including the date of the trip is sent to the Band Council to post in a prominent
13 location in the community, such as the Band Office or Northern Store. Radio
14 announcements to inform community members of the date of the trip are often read over
15 the local radio station.

16
17 Final notices are sent to customers two days before the trip. The day of the trip, a final
18 disconnection list is faxed to the Band Office and is given to field staff to perform service
19 disconnections. Disconnection trips may be rescheduled at the request of the Chief and
20 Council to accommodate events in the community (funerals or celebrations, for example)
21 or due to inclement weather conditions that prevent planes from landing. As a courtesy,
22 field staff report to the First Nation Band Office to let them know they will be starting to
23 disconnect customers. Field staff will take payment if a customer gives them cash or
24 another form of payment, but are not authorized to establish payment arrangements. If
25 customers call in to verify payments, they are taken off the list, and the field crew is
26 notified not to disconnect or to reconnect the customer if disconnection has already
27 occurred.

1 **4. SPECIFIC EXEMPTION REQUESTS**
2

3 Remotes supports the intent of the Board's amendments to the DSC and believes that it
4 can follow most of the rules set out therein. There are, however, certain areas where
5 Remotes submits that the rules as set out will significantly increase the costs to serve its
6 isolated territory and will strain relationships that Remotes has worked hard to build with
7 Band Councils and community members. The rules from which Remotes seeks relief can
8 be divided into three main areas: Payment Arrangements, Opening and Closing of
9 Accounts, and Standard Timelines. For clarity and brevity, Remotes has grouped these
10 exemption requests into these categories and discusses them below.

11
12 **Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

13 Remotes routinely makes payment arrangements with customers in arrears. Until 2006,
14 Remotes entered into long term (one year or longer) payment arrangements with
15 customers. Because customers tend not to pay during the winter months, outstanding
16 balances grew over more than one winter and were consequently very large. Band
17 Councils and customers complained that the amounts owing were too large to be paid off.
18 In 2007, Remotes revised the payment arrangement options offered to customers.
19 Remotes now begins the collection process earlier and no longer offers payment
20 arrangements longer than four months to residential customers. Customers are also
21 required to pay at least 50% of the balance owing in order to avoid disconnection.

22
23 Appendix C shows a comparison of total and average arrears for customers on the
24 disconnection list for fly-in communities in 2005 and 2010. In the small community of
25 Fort Severn for example, there were 61 customers with balances owing, with an average
26 balance of \$2,269.55. The total amount owed was \$138,442, which far exceeds available
27 supports within the community. In 2010, 28 customers had outstanding balances, with an
28 average balance of \$520.69. The total amount owing is \$14,579. Remotes notes that
29 even though Band Councils do not necessarily support service disconnections, since 2007

1 Remotes has not received a letter of complaint from a Band Council regarding its
2 residential collection activities.

3 Because Remotes' customers do not tend to pay their electricity bills during the winter
4 months, Remotes does not support offering longer-term payment arrangements with
5 small upfront payments. In Remotes' experience, its customers do not follow the
6 requirements for payment arrangements during the winter months and are left with
7 balances that are unmanageably large the following year. Appendix D shows the
8 seasonality of payments for Remotes' air access residential customers. Remotes has
9 founds that its current approach has left fewer customers disconnected and has enabled
10 customers to manage their accounts. Remotes has also found that the Social Assistance
11 Office and Band Office are able to manage requests for support with the smaller balances
12 that result from its current approach than with its previous collection experience.

13
14 **Opening and Closing of Accounts: Sections 2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2**

15 Within the First Nation reserves where Remotes supplies electricity, houses are
16 community assets. Houses are owned by the Band and are held for the benefit of Band
17 members: members do not pay rent and do not have a right of tenancy. Residents can
18 move with as little as 24 hours' notice. Residents tend to move frequently, when better
19 homes are available or to move closer to extended family within the communities.

20
21 Requests for service and notification of moves do not generally come from individuals,
22 but from the Band Council (usually the Band Housing Manager), which is responsible for
23 assigning housing to community members. When customers move into new or different
24 homes, Remotes is usually informed of the name of the customer by the Band Housing
25 Manager.

26
27 Remotes notes that it has experienced very few disputes with customers as to who is
28 responsible for paying accounts. Remotes does not transfer arrears from one customer to

1 another, or from a residential customer to the Band Council. Remotes does transfer
2 accounts for vacant homes to the Band Council following a discussion with the Band
3 Council Housing Manager if the Band agrees to take over payment for the service until
4 the home is occupied.

5
6 Remotes does not currently send staff who are qualified to disconnect services to read
7 meters when account holders change. The work associated with new account holders is
8 performed remotely. When Remotes is notified by the Band Housing Manager that a
9 new customer has moved into a house, the local meter reader reads the meter and faxes
10 the reading to Remotes' Thunder Bay office. New customers are sent a welcome
11 package from the Thunder Bay office that includes general information about the
12 company, information about customer rates and a summary of the Conditions of Service.

13
14 Remotes does not expect that individual customers will respond to a written request to
15 confirm that they are the new account holder within 15 days, if at all. Remotes notes that
16 First Nations have a tradition of oral culture. In its experience, customers do not respond
17 quickly to written requests of this type and may not understand the need to sign an
18 agreement for service. Remotes notes that only about half of its customers have
19 telephone service and that even if it is possible to speak to new customers over the phone,
20 Remotes does not currently have the ability to record and store customer telephone calls.

21
22 Remotes believes that scheduling staff who are qualified to disconnect service to read the
23 meter and to get authorization from the customer when accounts change hands would
24 increase costs to set up new accounts and could result in service delays for new
25 customers. Remotes has developed a form for employees of the Housing Branch of Band
26 Council and plans to request that the Band Housing Manager ask new customers to sign
27 the form and fax it back to the Thunder Bay office. However, Remotes is not at all
28 confident that the required paperwork will be completed and forwarded, as the Band
29 Housing Manager does not work for Remotes. Remotes cannot adhere to the new rules

1 without incurring significant costs. Accordingly, Remotes requests, and respectfully
2 submits that it would be appropriate for the Board to grant Remotes, an exemption from
3 Sections 2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2 of the DSC.

4
5 **Standard Timelines Sections 4.2.2.3, 4.3.3.1 (a), and 7.10**

6 To reduce the cost of collection trips, Remotes organizes customer collections and
7 disconnections by community. Two trips to each community are organized each year.
8 Customers are given early notice of the dates for the trips so that payment arrangements
9 can be negotiated and so that customers can arrange for assistance from local Social
10 Service offices.

11
12 Remotes supports the rules in the DSC requiring early notification of customers in
13 arrears. Remotes also understands the need for customers to have time to work with the
14 Social Assistance office and, going forward, with Remotes' LEAP agency to determine if
15 assistance is available to avoid service disconnection. Remotes' understanding is that the
16 rules regarding the deemed dates that notice is delivered and the length of notice required
17 are intended to establish minimum notice periods. Accordingly, Remotes requests an
18 exemption from Section 4.3.3.1 (a).

19
20 Remotes is not at all confident that all of its customers in arrears will access the LEAP
21 agency within the timeframes established in the DSC. Accordingly, Remotes proposes to
22 continue to give customers a longer notice period and to integrate access to Remotes'
23 LEAP agency into its existing customer notifications. Remotes is concerned, however,
24 that if its connection notices expire, customers in a single community may end up on
25 different timelines, requiring Remotes to make more frequent and costly trips to
26 communities to perform service disconnections.

1 Remotes is also concerned that if disconnection notices expire, Remotes may not be able
2 to continue to respond to requests from Chief and Council to change the date of
3 collection trips and may not be able to offer more flexibility to customers who miss the
4 ten-day window to contact Remotes' LEAP agency. Remotes therefore requests that the
5 Board grant an exemption from 4.2.2.3, Expiry of Notice.

6
7 Remotes organizes its field operations to reduce the number of flights to the
8 communities. Remotes currently reconnects customers who pay their bills following a
9 disconnection when there is other work in the community or when a crew is in a
10 "neighboring" community and arrangements can be made to reconnect the customer.
11 Remotes submits that its collections process gives customers ample time to pay prior to
12 the disconnection trips and that it cannot meet this standard without incurring
13 significantly higher costs. Accordingly, Remotes requests an exemption from Section
14 7.10, Standards for Reconnection.

15 16 **5. FUTURE CONSIDERATIONS**

17

18 On February 8, 2011 the Board proposed further changes to the Distribution System Code
19 to offer increased flexibility to low-income customers (EB-2007-0722). Remotes
20 supports the intent of the Board's amendments and understands the need to offer low-
21 income flexible payment options. Remotes is concerned that it will not be able to adapt
22 its business processes to follow standard rules without incurring significantly higher costs
23 and negatively impacting its customers.

24
25 Specifically, Remotes supports Hydro One Network's recommended changes to the
26 proposed DSC amendments related to the Revised Updated Proposed Low-Income and
27 other Customer Service Amendments to the Distribution System Code (EB-2007-0722)
28 as submitted by Hydro One Networks on February 28, 2011.

1 Additionally, Remotes notes that the proposed amendments regarding payment
2 arrangements in Sections 2.7.1.3 and 2.7.2 appear to be based on the assumption that the
3 distributor could balance the extra time to pay with a more strict enforcement of the
4 cancellation provisions in Section 2.7.4.3 than Remotes would practically be able to
5 undertake. In order to avoid extremely high bad debt expenses, Remotes would need to
6 perform collection and disconnection trips year round, and would need to be far less
7 flexible than it is today about missed bills. Remotes therefore respectfully requests
8 exemptions from Sections 2.7.1.3 and 2.7.2 of the Code as they apply to low-income
9 customers. Remotes requests that these additional exemptions be considered through this
10 proceeding.

11
12 Compared to most distributors, Remotes serves a unique group of customers. The
13 majority of Remotes' customers would likely qualify as low income. Based on Statistics
14 Canada information for Ontario, Remotes assumes that, for most distributors, low income
15 customers are a minority of the customer base. Similarly, most of Remotes customers
16 regularly miss bill payments without being subject to disconnection. For example, in a
17 recent assessment of its security deposits, Remotes reviewed 1,321 residential accounts.
18 Of these, only 23 customers regularly paid their bills within 60 days of receiving them.
19 Had Remotes applied the more stringent rules of payment outlined in the DSC, even
20 fewer customers would be deemed to have a good payment history.

21
22 Remotes service territory, business and customers are unique. In order to maintain good
23 working relationships with local Band Councils, Remotes must behave with sensitivity
24 and with flexibility to the needs of its customers and of the communities. Given the
25 nature of Remotes business, and the increasing requirement that the Board standardize
26 customer service rules across the province, Remotes suggests that the continued stringent
27 application of the Distribution System Code to Remotes' service territory is inappropriate
28 and requests that the Board consider exempting Remotes from the DSC.

SERVICE AREA MAP

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The attached map is a representation of Remotes' service territory. It is not a substitute for the written description in the licence. Remotes is licensed to serve 21 communities in Ontario. The generating station in Armstrong also serves the Whitesands Reserve and the settlement of Collins through a single distribution system and generation station.

Communities Served by Hydro One Remote Communities Inc

- Armstrong
- Bearskin Lake
- Big Trout Lake
- Biscotasing
- Collins
- Deer Lake
- Fort Severn
- Gull Bay
- Hillsport
- Kasabonika Lake
- Kingfisher Lake
- Landsdowne House
- Marten Falls
- Oba
- Sachigo Lake
- Sandy Lake
- Sultan
- Wapakeka
- Weagamow
- Webequie
- Whitesand

1 **MAP OF REMOTES' SERVICE TERRITORY**



2

3 The communities of Whitesand and Collins are served through the Armstrong
4 Distribution System.

Appendix B
Accounts Receivable Aging - Residential
2003 -2010

2003

Revenue Class	Data	January		February		March		April		May		June		July		August		September		October		November		December		
		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	
Residential	Sum of 0 - 21 DAYS	486,032.70	16%	498,446.39	15%	540,261.81	16%	430,638.36	12%	435,637.47	12%	381,106.76	11%	296,993.44	9%	350,993.22	10%	383,803.28	12%	349,360.87	10%	419,460.75	12%	324,636.14	10%	Under
	Sum of 22 - 59 DAYS	412,278.50	13%	435,873.21	13%	419,183.84	12%	451,172.99	13%	458,755.71	13%	427,009.35	13%	351,247.27	10%	297,046.94	9%	420,933.75	12%	323,433.28	10%	345,096.76	10%	456,573.39	14%	119 days
	Sum of 60 - 119 DAYS	477,664.02	15%	505,455.89	15%	536,119.29	16%	589,401.12	17%	562,345.91	16%	544,735.54	16%	532,482.24	16%	510,839.06	15%	446,380.68	13%	409,426.14	12%	441,352.65	13%	389,862.30	12%	37%
	Sum of 120 - 239DAYS	566,761.07	18%	567,735.75	17%	625,676.29	18%	671,958.51	19%	705,319.54	20%	721,098.43	21%	793,775.99	24%	826,698.16	25%	796,852.44	24%	773,131.01	23%	687,509.24	20%	586,807.92	18%	
	Sum of 240 - 1YEAR	461,269.44	15%	449,959.27	14%	447,972.98	13%	437,832.40	12%	386,608.65	11%	368,476.07	11%	402,258.31	12%	418,990.11	12%	460,173.65	14%	513,614.58	15%	520,147.57	15%	468,412.64	15%	Over 119
	Sum of 1 - 2YEARS	496,306.95	16%	563,601.97	17%	612,815.00	18%	660,896.57	19%	663,178.13	19%	626,739.32	18%	641,947.26	19%	630,950.36	19%	608,861.44	18%	620,682.10	19%	590,399.23	18%	606,598.84	19%	Days
	Sum of 2 + Years	230,641.49	7%	244,167.55	7%	270,614.58	8%	292,869.85	8%	301,764.49	9%	321,698.44	9%	333,892.52	10%	337,970.60	10%	336,436.13	10%	351,966.97	11%	352,941.35	11%	367,205.94	11%	63%
Total Residential		3,130,954.17		3,265,240.03		3,452,643.79		3,534,769.80		3,513,609.90		3,390,863.91		3,352,597.03		3,373,488.45		3,333,431.37		3,341,614.95		3,356,907.55		3,200,097.17		

2004

Revenue Class	Data	January		February		March		April		May		June		July		August		September		October		November		December		
		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	
Residential	Sum of 0 - 21 DAYS	399,208.18	15%	452,779.11	16%	360,594.69	12%	338,618.21	12%	365,553.96	13%	282,612.08	10%	282,246.98	10%	328,421.33	11%	295,520.24	11%	256,043.38	9%	353,836.38	13%	352,871.70	12%	Under
	Sum of 22 - 59 DAYS	380,245.68	15%	415,997.32	15%	464,753.35	16%	435,199.86	15%	404,708.66	14%	384,509.57	14%	351,184.17	12%	276,898.28	10%	283,061.43	10%	305,840.40	11%	299,975.85	11%	399,482.59	14%	119 days
	Sum of 60 - 119 DAYS	403,028.69	16%	497,287.08	18%	520,572.95	18%	575,676.39	20%	541,248.34	19%	510,013.36	18%	513,987.21	18%	478,423.34	17%	401,893.06	15%	373,493.11	14%	375,584.95	14%	371,347.76	13%	40%
	Sum of 120 - 239DAYS	467,114.33	18%	461,782.72	16%	537,370.21	18%	543,578.86	19%	570,167.07	20%	653,313.56	23%	694,959.11	24%	749,314.74	26%	697,759.26	25%	663,147.88	24%	613,276.26	22%	556,122.33	20%	
	Sum of 240 - 1YEAR	345,724.91	13%	369,280.11	13%	351,223.70	12%	323,734.52	11%	294,092.36	10%	280,753.17	10%	282,506.27	10%	296,575.47	10%	347,511.09	13%	407,479.84	16%	407,479.84	15%	413,436.98	15%	Over 119
	Sum of 1 - 2YEARS	391,787.60	15%	422,600.23	15%	448,911.76	15%	470,667.41	16%	464,216.00	16%	462,907.99	16%	442,613.80	16%	442,022.29	15%	430,767.65	16%	419,423.81	15%	407,164.89	15%	418,090.03	15%	Days
	Sum of 2 + Years	202,519.08	8%	217,816.00	8%	232,188.98	8%	248,162.54	8%	260,329.59	9%	262,711.01	9%	272,710.67	10%	287,709.59	10%	291,633.13	11%	296,796.51	11%	306,336.92	11%	320,584.18	11%	60%
Total Residential		2,589,628.47		2,837,542.57		2,915,615.64		2,935,637.79		2,900,315.98		2,836,820.74		2,840,214.21		2,859,365.04		2,748,147.86		2,743,505.97		2,763,655.09		2,830,935.57		

2005

Revenue Class	Data	January		February		March		April		May		June		July		August		September		October		November		December		
		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	
Residential	Sum of 0 - 21 DAYS	421,052.87	14%	492,991.60	16%	347,431.72	11%	385,280.32	13%	424,165.70	13%	282,612.08	10%	282,246.98	10%	328,421.33	11%	295,520.24	11%	256,043.38	9%	353,836.38	13%	352,871.70	12%	Under
	Sum of 22 - 59 DAYS	391,314.77	13%	363,393.27	12%	495,398.47	16%	378,360.96	12%	364,544.36	12%	224,510.25	8%	197,698.59	8%	224,510.25	8%	197,698.59	8%	224,510.25	8%	225,728.04	9%	351,130.65	13%	119 days
	Sum of 60 - 119 DAYS	437,162.90	14%	517,956.48	16%	527,042.96	16%	515,652.57	17%	516,691.60	16%	510,013.36	18%	513,987.21	18%	478,423.34	17%	401,893.06	15%	373,493.11	14%	375,584.95	14%	371,347.76	13%	40%
	Sum of 120 - 239DAYS	543,196.82	18%	535,298.58	17%	559,777.87	17%	559,835.29	18%	581,417.29	18%	510,013.36	18%	513,987.21	18%	478,423.34	17%	401,893.06	15%	373,493.11	14%	375,584.95	14%	371,347.76	13%	
	Sum of 240 - 1YEAR	433,160.83	14%	387,717.67	12%	375,869.48	12%	346,758.12	11%	336,369.55	11%	436,826.16	16%	428,115.69	17%	434,826.16	16%	432,227.34	18%	394,221.66	16%	344,358.18	13%	334,048.21	12%	
	Sum of 1 - 2YEARS	460,628.54	15%	502,063.45	16%	554,005.57	17%	521,603.79	17%	553,520.82	18%	541,896.45	18%	521,603.79	17%	553,520.82	18%	541,896.45	18%	521,603.79	17%	553,520.82	18%	541,896.45	18%	Over 119
	Sum of 2 + Years	332,756.78	11%	345,965.92	11%	354,473.46	11%	365,776.23	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	379,169.57	12%	Days
Total Residential		3,019,273.51		3,145,386.97		3,213,999.53		3,073,267.28		3,155,878.89		2,836,820.74		2,840,214.21		2,859,365.04		2,748,147.86		2,743,505.97		2,763,655.09		2,830,935.57		

2006

Revenue Class	Data	January		February		March		April		May		June		July		August		September		October		November		December		
		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	
Residential	Sum of 0 - 21 DAYS	437,045.21	16%	477,959.01	16%	344,694.24	11%	388,457.05	12%	287,905.19	10%	269,679.97	10%	260,592.18	10%	232,108.67	9%	257,789.30	11%	313,643.76	12%	307,972.54	12%	387,052.08	14%	Under
	Sum of 22 - 59 DAYS	300,079.99	11%	333,638.93	11%	479,817.61	16%	394,407.03	13%	326,795.67	11%	293,756.91	11%	224,416.40	9%	189,978.15	8%	197,644.43	8%	218,509.92	9%	264,330.75	10%	368,324.88	13%	119 days
	Sum of 60 - 119 DAYS	356,602.66	13%	432,886.92	15%	448,545.31	15%	526,515.79	17%	441,213.18	15%	321,682.14	12%	301,846.43	12%	279,963.73	11%	218,075.92	9%	210,589.71	8%	242,389.06	9%	299,194.26	11%	38%
	Sum of 120 - 239DAYS	347,718.28	12%	327,782.92	11%	398,672.82	13%	436,895.57	14%	475,323.35	16%	436,104.42	16%	428,115.69	17%	434,826.16	16%	432,227.34	18%	394,221.66	16%	344,358.18	13%	334,048.21	12%	
	Sum of 240 - 1YEAR	406,118.82	15%	384,733.57	13%	337,036.49	11%	300,286.92	10%	280,256.21	9%	206,510.36	8%	209,291.63	8%	242,359.60	10%	277,487.63	11%	329,063.77	13%	339,219.66	13%	339,084.08	12%	Over 119
	Sum of 1 - 2YEARS	605,299.80	22%	629,714.07	21%	687,012.87	22%	717,203.35	23%	754,556.04	26%	747,144.27	28%	724,468.11	29%	711,364.33	29%	677,214.29	27%	696,749.47	27%	688,545.13	25%	688,545.13	25%	Days
	Sum of 2 + Years	347,096.43	12%	365,186.43	12%	358,914.35	12%	366,780.22	12%	377,261.51	13%	381,530.61	14%	379,958.70	15%	359,731.51	15%	351,136.45	14%	372,571.32	15%	380,461.46	14%	380,461.46	14%	62%
Total Residential		2,799,961.19		2,951,901.85		3,054,693.69		3,130,545.93		2,910,711.15		2,656,408.68		2,528,689.14		2,453,362.54		2,445,725.40		2,517,209.92		2,567,590.98		2,796,710.10		

2007

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**Comparison of Disconnection/Collection Lists by
 Community for 2005-2010**

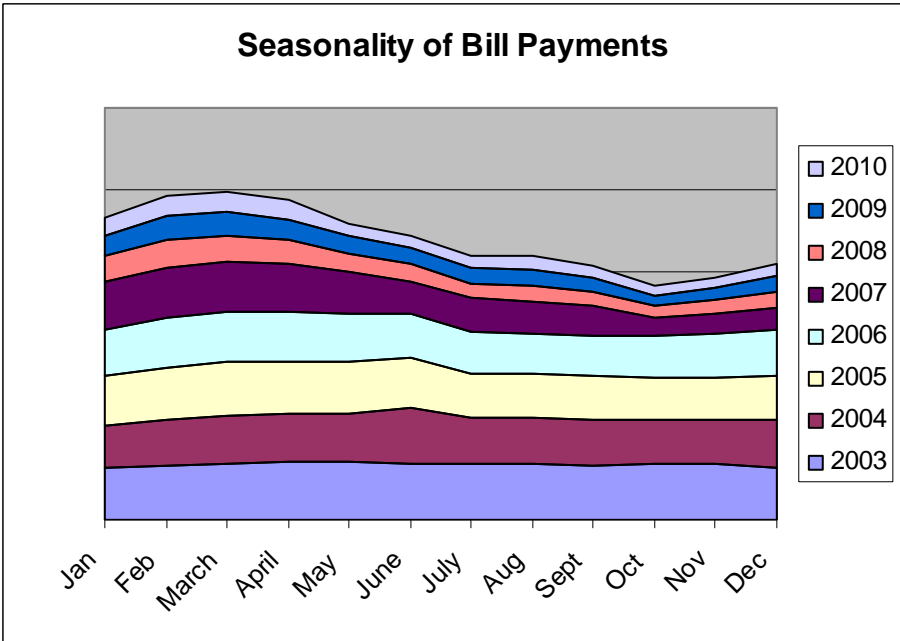
	Bearskin Lake		Big Trout		Deer Lake		Fort Severn		Kasabonika	
	2005	2010	2005	2010	2005	2010	2005	2010	2005	2010
Customers on List	51	78	65	31	67	9	61	28	78	22
Community Total	\$ 74,408	\$ 47,750	\$ 45,146	\$ 19,235	\$ 92,492	\$ 5,909	\$ 138,443	\$ 14,579	\$ 32,246	\$ 8,483
Average by Customer	\$1,459	\$612	\$695	\$620	\$1,380	\$657	\$2,270	\$521	\$413	\$386

	Kingfisher		Landsdowne		Sachigo		Sandy Lake		Wapekeka	
	2005	2010	2005	2010	2005	2010	2005	2010	2005	2010
Customers on List	27	12	39	13	74	32	157	146	18	38
Community Total	\$ 20,059	\$ 4,950	\$ 59,135	\$ 11,771	\$ 69,913	\$ 19,283	\$ 179,577	\$ 113,099	\$ 23,606	\$ 13,986
Average by Customer	\$743	\$412	\$1,516	\$905	\$945	\$603	\$1,144	\$775	\$1,311	\$368

	Weagamow		Webequie	
	2005	2010	2005	2010
Customers on List	39	61	73	32
Community Total	\$ 26,369	\$ 24,526	\$ 104,383	\$ 10,529
Average by Customer	\$676	\$402	\$1,430	\$329

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SEASONALITY OF BILL PAYMENTS



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