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VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
Letter of Comment: EB-2009-0229
Hydro 2000 Inc. – 2010 Electricity Distribution Rate Application

As counsel for the Vulnerable Energy Consumers Coalition (VECC), I am writing to provide comments on Hydro 2000 Inc's 2010 Electricity Distribution Rate Application. VECC's review of the Application and its comments are limited to Hydro 2000's implementation of the Board's EB-2007-0704 Decision regarding cost allocation and the appropriate revenue to cost ratios.

In its Application (Sheet C1.1.1 of the Supplementary Filing Module) Hydro 2000 proposes to increase the revenue to cost ratios for both the Residential and the GS>50 classes relative to those approved for 2008. VECC submits that these increases are inconsistent with the Board's EB-2007-0704 Decision (pages 12-13). In that Decision Hydro 2000 was directed to adopt certain revenue to cost ratios for 2008. However, there was no direction provided in the Decision to alter the revenue to cost ratios for any of the classes in the subsequent years. VECC requests that the Board direct Hydro 2000 to maintain the revenue to cost ratio (and therefore the relative revenue allocation by customer class) at the same values as approved for 2008 rates for purposes of setting 2010 rates.

Thank you for the opportunity to comment.

Yours truly,

Michael Buonaguro
Counsel for VECC

cc: Hydro 2000 Inc.