



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

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February 17, 2011

**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)**  
**Final Submissions: EB-2010-0116**  
**Tillsonburg Hydro Inc. – 2011 Electricity Distribution Rate Application**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition in the above noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

cc: Mr. Bryan Drinkwater  
Tillsonburg Hydro Inc.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch.B, as amended;**

**AND IN THE MATTER OF an Application by Tillsonburg Hydro Inc. pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for electricity distribution to be effective May 1, 2011.**

**FINAL SUBMISSIONS**

**On Behalf of The**

**VULNERABLE ENERGY CONSUMERS COALITION (VECC)**

**February 17, 2011**

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# Vulnerable Energy Consumers Coalition (VECC)

## Final Argument

### **1 The Application**

1.1 Tillsonburg Hydro Inc. ("Tillsonburg") filed an application ("the Application") with the Ontario Energy Board ("the Board"), under section 78 of the Ontario Energy Board Act, 1998 for electricity distribution rates effective May 1, 2011. The Application was filed in accordance with the OEB's guidelines for 3<sup>rd</sup> Generation Incentive Regulation, which provide for a formulaic adjustment to distribution rates and related charges. As part of its Application, Tillsonburg included an adjustment to the customer class revenue to cost ratios. The following section sets out VECC's final submissions regarding this aspect of the Application.

### **2 Revenue to Cost Ratio Adjustments**

2.1 In response to interrogatories<sup>1</sup> from VECC, Tillsonburg has corrected the allocation of miscellaneous revenues used in the revenue to cost ratio adjustment. Tillsonburg provided portions of but not a complete copy of the resulting revised Revenue to Cost Ratio Adjustment Work Form. However, it appears to VECC that:

- The associated adjustments are in accordance with the Board's EB-2009-0143 Decision, and
- The revised Revenue-Cost Ratio Adjustment Work Form has been completed appropriately.

Subject to Board Staff confirming the above, VECC submits that the rate adjustments, as calculated by the revised Work Form, are appropriate.

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<sup>1</sup> VECC #1

### **3 Recovery of Reasonably Incurred Costs**

- 3.1 VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an award of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

All of which is respectfully submitted this 17<sup>th</sup> day of February 2011.