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October 30, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St.
Toronto, ON

Dear Ms. Walli:

Re: EB-2017-0038
Erie Thames Powerline Corp. (ETPL) 2018 Distribution Rates
VECC Submission on delayed implementation of rate change

On October 25, 2018 the Board informed parties that ETPL would be unable to implement a rate order immediately following the Board's decision on its Application. No reasons were provided by either the Board or the Applicant for ETPL having to implement rates as late as January 1, 2019. However, we are of the understanding that it relates to a personnel issue at the Utility. It is also unclear but we assume the Utility is seeking to recover any lost revenue for the billing periods of November and December.

In the normal course VECC would argue against allowing these amounts to be recovered as the delay in implementing rates is a matter within the Utility's control and there will be a negative impact on customers. However, given the reasons for the delay and the long delays incurred by ETPL in having its application reviewed as part of the Board's pilot "proportionate review" process we have no objections to the Utility's proposal in this instance.

Yours truly,

M. Garner

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