



By E-mail & By Electronic Filing

April 7, 2009

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto ON M4P 1E4

Dear Ms Walli,

Bluewater Power Distribution Corporation ("Bluewater")

Draft Rate Order

Board File No.: EB-2008-0221

Our File No.: 339583-000028

In our capacity as solicitors for Canadian Manufacturers & Exporters ("CME"), we have reviewed the Draft Rate Order circulated by Bluewater Power ("Bluewater") on April 3, 2009. We find it to be in accordance with the Settlement Agreement which is attached as Appendix A to the Draft Rate Order.

The comments which follow are not intended to delay the issuance of the Rate Order Bluewater has drafted. Rather, they are provided as suggestions for enhancing, in future rate proceedings of the electricity distributors the Board regulates, the "Delivery Charge" impacts of the rates the Board considers and approves.

"Delivery Charge" impacts are obviously a matter of concern to the Board. They were referenced in the Notice of Application in this proceeding and the Board's Revenue Requirement Work Form, attached at Appendix C of Bluewater's Draft Rate Order, requires that delivery charge impacts for selected customers be displayed.

Since "Delivery Charge" impacts are a matter of significance for all customers, we suggest that a "Sub-total Delivery" line be added to the format of the customer impact information contained in Appendix N to the Settlement Agreement, along with a footnote to that line item indicating that the "Sub-total Delivery" line item includes "Monthly Fixed Charge, Distribution Charge, Deferral Account Disposition, Transmission Network, and Transmission Connection Charges".

With the addition of this information to the format of the customer impact material, readers thereof would be able to see the impact of the following:

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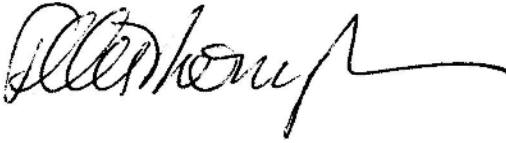
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- (a) Changes in Distribution Charges,
- (b) Changes in Delivery Charges, and
- (c) Changes in Total Bill.

We respectfully suggest that the addition of this information will enhance, for all customer classes, the transparency of the rate increase impact information pertaining to the rate increases which the Board approves.

Please contact me if there are any questions.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Peter C.P. Thompson', with a long horizontal flourish extending to the right.

Peter C.P. Thompson, Q.C.

PCT/slc

c. Bluewater Power Distribution Corporation
Intervenors EB-2008-0221
Paul Clipsham (CME)

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