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ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

April 14, 2009

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: Niagara-on-the-Lake Hydro Inc. – 2009 Draft Rate Order
Vulnerable Energy Consumers Coalition (VECC) Comments
Board File: EB-2008-0237

Please find below the Vulnerable Energy Consumers Coalition's (VECC) comments regarding the Draft Rate Order submitted by Niagara on the Lake Inc. on April 6, 2007. We apologize for the late filing, it was through inadvertence on the part of counsel.

VECC's only comment is with respect to the calculation of the cost of power for purposes of establishing the 2009 working capital allowance. On page 6 of the Draft Rate Order, Niagara on the Lake calculated the revised cost of power value using the Board's most recent projected RPP price forecast (\$0.0603 / kWh). However, as noted in the Board's decision (page 16), the Distributor expressed the view that the forecast HOEP price was more appropriate than the forecast RPP price. In its Decision, the Board did not provide any express direction as to which value should be used. As a result, VECC is of the view that Niagara on the Lake should have use the forecast HOEP value of \$0.0516 / kWh in its calculations.

Thank you for the opportunity to comment.

Yours truly,

Michael Buonaguro
Counsel for VECC

cc: Jim Huntingdon