



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

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

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

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

July 21, 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: Vulnerable Energy Consumers Coalition (VECC) Comments**  
**Welland Hydro-Electric System Corp. – 2009 Draft Rate Order**  
**Board File: EB-2008-0247**

As counsel for the Vulnerable Energy Consumers Coalition (VECC), I am writing to provide comments regarding Welland Hydro-Electric System Corp.'s (Welland) Draft Rate Order.

VECC has reviewed and concurs with Energy Probe's submissions regarding Welland's tax calculations. Apart from this, VECC has no submissions regarding the derivation of the revenue requirement used in the revised Draft Rate Order filed on July 17<sup>th</sup>, 2009.

Welland has not provided the derivation of the class percentages used to calculate the values for the "Updated C.A. Study Cost Proportions for 2009 Excluding the Transformer" column presented in Exhibit H- Revised. Furthermore, the proportions are different from those underlying a similar column presented in Exhibit K – Revised as part of its January 20, 2009 Supplementary Filing. As result, VECC is unable to confirm

whether the proposed allocation by customer class is consistent with the Board's direction even though both are purportedly based on the 2006 CA Study.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC

cc: Mr. Wayne Armstrong  
Welland Hydro-Electric System Corp.