

IN THE MATTER of the *Ontario Energy Board Act 1998*,
Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by West Coast Huron
Energy Inc. for an Order or Orders approving just and reasonable rates
and other service charges for the distribution of electricity, effective May
1, 2009.

AND IN THE MATTER OF supplemental evidence filed by West Coast
Huron Energy Inc. on September 16, 2009.

SUBMISSIONS
OF THE
SCHOOL ENERGY COALITION

1. Pursuant to Procedural Order #6 in this matter, these are the submissions of the School Energy Coalition ("SEC") on the supplemental evidence filed by the applicant, West Coast Huron Energy Inc. (WCHE), on September 16, 2009.
2. SEC's submissions are confined to the \$192,877 "transitional obligation" that WCHE has included as part of the Accrued Benefits Obligation ("ABO").
3. It is clear that this portion of the ABO is an out of period expense. WCHE stated, in response to an interrogatory from SEC that it trying to "recoup actual expenses incurred that had not been evaluated until the PRNB report was completed." [SEC IR#3] This obligation should have been recorded, however, when the CICA Section 3461 came into effect and was not. Allowing WCHE to recover the transitional obligation at this point, however, would constitute

retroactive ratemaking. Therefore, in SEC's submission, the \$192,877 "transitional obligation", which WCHE proposes to recover over nine years at \$21,432 per year, should not be allowed.

Working Capital Allowance

4. SEC agrees with Board Staff that the ABO does not involve a cash outlay in the current period and therefore there is no reason to amend WCHE's working capital.

All of which is respectfully submitted this 9th day of October, 2009.

John De Vellis
Counsel to the School Energy Coalition