



**PUBLIC INTEREST ADVOCACY CENTRE**  
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Michael Buonaguro  
Counsel for VECC  
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October 9, 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**  
**West Coast Huron Energy Inc.**  
**Board File: EB-2008-0248**

Please find enclosed the submissions of VECC with respect to the applicant's supplementary filing.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B, as amended;

**AND IN THE MATTER OF** an Application by West Coast Huron Energy Inc. pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for the delivery and distribution of electricity;

**AND IN THE MATTER OF** supplemental evidence filed by West Coast Huron Energy Inc. on September 17, 2009.

**SUBMISSIONS  
On Behalf of the  
VULNERABLE ENERGY CONSUMERS COALITION (“VECC”)**

**October 9, 2009**

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**Submissions of the Vulnerable Energy Consumers Coalition (“VECC”)**

1. VECC has reviewed the supplemental evidence, the IR responses, the submissions of Board Staff, and the submissions of the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 6, VECC makes the following submissions.
2. In its Decision and Order dated June, 17, 2009, the Ontario Energy Board (“the Board”) disallowed a \$150,000 expense claim made by West Coast Huron Energy Inc. (“WCHEI”) in respect of an Accrued Benefits Obligation (“ABO”) relating to Post Retirement Non-Pension Benefits (“PRNPB”).

3. However, the Board did allow WCHEI three months in which to provide adequate clarification and support in respect of its \$150,000 ABO claim.
4. Three months after the Board's decision, on September 17, 2009, WCHEI filed supplemental evidence in support of an ABO claim estimated to be \$342,877 at January 1, 2008. VECC notes that this new claimed amount is more than double the claim filed during the rates proceeding.
5. VECC's view is that WCHEI, having failed to support its initial request for \$150,000 during the hearing, was granted a rare privilege by the Board in allowing the Applicant a further three months to support its \$150,000 claim.
6. VECC submits that the new higher amount claimed is irrelevant and out of period; furthermore the increase in the original claim is not associated with current employees of WCHEI.
7. In VECC's view, there should be no advantage – in the sense of being able to significantly increase an expense after the hearing is over – to a utility that failed to adequately explain, clarify, and support its original claim during the hearing.
8. In addition VECC has reviewed and supports the submissions of the SEC with respect to the increase in the ABO amount claimed.

All of which is respectfully submitted on this 9<sup>th</sup> day of October, 2009.