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December 3, 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)**  
**Letter of Comment: EB-2009-0253**  
**Wellington North Power Inc. – 2010 Electricity Distribution Rate Application**

As counsel for the Vulnerable Energy Consumers Coalition (VECC), I am writing to provide comments on Wellington North Power Inc's 2010 Electricity Distribution Rate Application. VECC's review of the Application and its comments are limited to Wellington North's implementation of the Board's EB-2007-0693 Decision regarding cost allocation and the appropriate revenue to cost ratios.

In its Application (page 13) Wellington North proposes to increase the revenue to cost ratios for both the Residential and the GS<50 classes. VECC submits that these increases are inconsistent with the Board's EB-2007-0693 Decision (pages 29-30). In that Decision Wellington North was directed to increase the revenue to cost ratios for both the Street Lighting and Sentinel Lighting classes based on the fact that the current ratios for both classes were below the Board's established range. Wellington was also directed to apply the increased revenue to the other customer classes (implicitly those with ratios above 100%) as it wished.

There was no direction provided in the Decision to alter the revenue to cost ratios for the Residential or GS<50 classes, both of which are within the Board's recommended range. Indeed, the Board explicitly rejected a proposal by Wellington North to increase the ratio for the Residential class. VECC requests that the Board direct Wellington

North to maintain the revenue to cost ratios for the Residential and GS<50 classes at their current values (97.3% and 96.1% respectively) for purposes of setting 2010 rates.

Thank you for the opportunity to comment.

Yours truly,

Michael Buonaguro  
Counsel for VECC

cc: Wellington North Power Inc.