



PUBLIC INTEREST ADVOCACY CENTRE
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December 10, 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)
Notice of Intervention and Request for Expansion of Issues Eligible for
EB-2009-0250
ENWIN Utilities Ltd. – 2010 Electricity Distribution Rate Application

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

**ENWIN Utilities Ltd.
2010 Electricity Rate Application
Board File No. EB-2009-0221**

VECC's Interrogatories

Question #1

Reference: i) Application, page 8
ii) Ontario Energy Board, Filing Instructions for the 2010 3rd Generation Incentive Regulation Mechanism (IRM3), August 24, 2009, page 5
iii) Ontario Energy Board, Filing Instructions for the 2010 3rd Generation Incentive Regulation Mechanism (IRM3), Supplemental Filing Module, August 24, 2009, page 5

Preamble: Reference (ii) contains the following paragraph:
The rate generator model has been designed to be a very flexible tool for rate applications. The model that we make available has been generically formatted for most utilities for the common adjustments. Some utilities have additional requirements not shown in the generic model. For additional assistance applicants may contact the market operations hotline at market.operations@oeb.gov.on.ca and Board staff will respond in less than five business days.

Reference (iii) contains a similar paragraph.

- a) Please indicate whether or not ENWIN contacted the OEB as directed in the Filing Instructions to discuss how the IRM models could be refined to address the requirements of the Settlement Agreement.

- b) If ENWIN did not contact the Board, please explain why given the discretion granted in the Filing Guidelines.

- c) If ENWIN did contact the Board, please provide a copy of the initial correspondence sent to "Market Operations" and any subsequent correspondence between the OEB Staff and ENWIN.

- d) If ENWIN was advised that the generic model could not be adjusted to accommodate the requirements of the Settlement Agreement, please provide either: i) a copy of the correspondence if the advice was provided in writing/e-mail or ii) the name of the contact Staff person at the Board who provided the oral advice and summary of the rationale to why the accommodation could not be made.