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ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7
Toronto Office: 34 King St E Suite 1102 Toronto Ont. M5C 2X8

March 16, 2010

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: Burlington Hydro Inc. – 2010 Draft Rate Order
Vulnerable Energy Consumers Coalition (VECC) Comments
Board File: EB-2009-0259

As counsel for the Vulnerable Energy Consumers Coalition's (VECC) I am writing to provide comments regarding Burlington Hydro's Draft Rate Order (DRO) circulated March 12, 2010. VECC's only comments are with respect to the calculation of Working Capital Allowance and Revenue to Cost Ratios used in the allocation of the Revenue Requirement to customer classes.

Working Capital Allowance

In Appendix B (page 14) Burlington Hydro sets out its updated Cost of Power calculation where the results are used to in the determination of the Working Capital Allowance. VECC notes that for three of the components (Transmission-Network; Transmission-Connection and Rural Rate Assistance) the load forecast used is the one filed in the original Application as opposed to the load forecast as approved by the Board and set out on page 3 of the DRO. Correcting the load forecast for these three cost components will increase the 2010 Rate Base and the resulting rates. VECC has not undertaken any calculation to determine the materiality of the correction.

Cost Allocation

On page 3 of Appendix C Burlington Hydro has set out the revenue to cost ratios that result from updating the Cost Allocation for the 2010 Revenue Requirement determined in accordance with the Board's Decision. VECC's only concern is with respect to the proposed ratio for the USL class. In the original Application the initial 2010 ratio was 103.6% and the Board accepted Burlington's proposal to leave the ratio unchanged. In the DRO the updated ratio is 99.4% and Burlington is proposing to increase it to 100%. VECC submits that, as a matter of principle, this proposal is inconsistent with the Board's Decision and the ratio used should be the updated value of 99.4%. However, VECC notes that given the dollars allocated to the USL class and small change involved the impact of not following the Board's Decision is likely to immaterial.

Yours truly

Original Signed by

Michael Buonaguro
Counsel to VECC