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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)
EB-2009-0270
North Bay Hydro Distribution Limited – 2010 Electricity Distribution
Rate Application

We have reviewed the draft rate order and only have one comment, which is with respect to the issue of Revenue to Cost Ratios.

In reading the draft rate order there appears to be no discussion about the movement in revenue to cost ratios, nor any illustration of how certain classes have been moved. While Appendix I illustrates the end point for the purposes of setting 2010 rates, VECC would suggest:

- a) a short paragraph in the summary section confirming that classes below the low end of the Board's range of Revenue to Cost ratios are being moved 50% towards the lower end in 2010, with the remaining 50% of movement occurring in two 25% steps in 2011 and 2012 respectively,
- b) confirmation that the starting revenue to cost ratios from the application have been modified slightly in accordance with the settlement, and
- c) a column in Appendix I showing the adjusted starting revenue to cost ratios for each class, such that the reader can see which classes have had their ratios moved and to what extent (i.e. it should be clear from the chart

in Appendix I which classes have been moved 50% towards their lower range).

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC