



PUBLIC INTEREST ADVOCACY CENTRE
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October 8, 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: Vulnerable Energy Consumers Coalition (VECC)
Hydro Ottawa Limited – 2011 Electricity Distribution Rate Application**

Having previously discussed the matter with Energy Probe, and having reviewed their submissions on the Threshold Issue submitted to the Board on October 7, 2010, VECC agrees with and adopts the submissions filed on behalf of Energy Probe.

More specifically, VECC agrees with Energy Probe's conclusion that Hydro Ottawa has not justified why an early rebasing is required, nor has Hydro Ottawa demonstrated that it cannot adequately manage its resources and financial needs during the one year remaining in its IRM plan. Accordingly VECC agrees with the submission that that the Board should find that there is no justification or need for Hydro Ottawa to terminate the 3rd Generation IRM plan in advance of its scheduled rebasing application for the 2012 test year.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC