



December 7, 2010

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27th Floor P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Ottawa River Power Corporation**  
**OEB File No. EB-2009-0165**

Ottawa River Power Corporation ("ORPC") wishes to amend its reply submission in regard to its Cost of Service Application section 7.2 as follows:

**7.2 Proposed Ratios**

As stated above, VECC is generally supportive of ORPC's proposed revenue to cost ratios. Nonetheless, because VECC supports a different starting point for cost allocation that yields different results, its comments with regards to the direction each class' revenue to cost ratio should take departs from those proposed by ORPC<sup>49</sup>. The table below (Table #9) contrasts the adjustment proposed by VECC with that of ORPC.

**Table #9 – Revenue to cost ratios**

<b>Customer Class</b>	<b>ORPC</b>	<b>VECC</b>
Residential	Moved to 1.07 from 1.11 (over 4 years)	1.06
GS<50	Remains at 0.88	0.84
GS>50	Remains at 1.03	Lowered to an unspecified value over 1.06 from 1.03

Street Lighting	Moved towards floor boundary of 0.70 from 0.30 (over four years)	0.38
Sentinel Lighting	Moved to floor boundary of 0.70 from 0.47	0.70
USL	Moved to floor boundary of 0.80 from 0.05	Lowered to at least 1.22

OPRC notes that VECC's proposed values for residential, GS <50, street lighting and sentinel lighting are very similar. VECC's bullet point about reducing USL to 1.22 is unclear, as USL is currently at 0.05. VECC also refers to reducing the GS>50 to 1.06, however, this too is currently below this value at 1.03. Accordingly, ORPC submits that its proposed revenue to cost ratios should be adopted by the Board.

Please distribute to all parties involved in this proceeding.

Should you require any further information, please do not hesitate to contact Mr. Doug Fee at the number below.

Yours very truly,



Douglas Fee  
President & C.E.O.