



Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

December 13, 2010

Dear Ms. Walli:

Re: Request by Vulnerable Energy Consumers Coalition (VECC) to Intervene

**Niagara-on-the-Lake Hydro Inc.
2011 Distribution Rate Application EB-2010-0101**

Dear Ms. Walli,

Niagara-on-the-Lake Hydro Inc. respectfully requests that the Ontario Energy Board deny the request by VECC to intervene in our 2011 rate application. Our objection is based on the following information;

VECC has indicated that they represent the Federation of Metro Tenants Association of which we strongly believe has no connection to our small community. Our research also indicates that VECC represent the Ontario Coalition of Senior Citizens' Organizations (OCSCO). The OCSCO website lists a number of its members but we could not find any that reside, or have any representation in our community. Conversely, any such rate decision in our community will have no impact on the two associations listed.

For the past several years, our company has actively supported electrical conservation initiatives because we believe in the positive aspects for our customers and the province despite the knowledge that lower consumption erodes our revenue. No less than 97% of the LRAM data presented in our IRM application relates to Ontario Power Authority conservation programs that NOTL

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Hydro participated. The data provided came directly from that public authority. The O.E.B has directed LDC's to utilize an independent 3rd party to verify the results for which we have complied (at a substantial cost) in our application. We expect that O.E.B staff will further scrutinize the data. Finally, an intervenor with no representation in our community also wishes to examine this data at further significant cost.

We ask the OEB to reconsider granting intervenor status based on the lack of proven representation in our community and the excess scrutiny of the data in comparison to the materiality of the LRAM component in the application.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Huntingdon".

Jim Huntingdon
President