



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

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January 19, 2011

**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)**  
**Final Submissions: EB-2010-0093**  
**Innisfil Hydro Distribution Systems Limited – 2011 Electricity Distribution**  
**Rate Application**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition (VECC) in the above noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

cc: Ms. Laurie Ann Cooledge  
Innisfil Hydro Distribution Systems Limited

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch.B, as amended;**

**AND IN THE MATTER OF an Application by Innisfil Hydro Distribution Systems Limited pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for electricity distribution to be effective May 1, 2011.**

**FINAL SUBMISSIONS**

**On Behalf of The**

**VULNERABLE ENERGY CONSUMERS COALITION (VECC)**

**January 19, 2011**

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## **Vulnerable Energy Consumers Coalition (VECC)**

### **Final Argument**

#### **1 The Application**

- 1.1 Innisfil Hydro Distribution Systems Limited ("Innisfil") filed an application ("the Application") with the Ontario Energy Board ("the Board"), under section 78 of the Ontario Energy Board Act, 1998 for electricity distribution rates effective May 1, 2011. The Application was filed in accordance with the OEB's guidelines for 3<sup>rd</sup> Generation Incentive Regulation, which provide for a formulaic adjustment to distribution rates and related charges. As part of its Application, Innisfil included an adjustment to the customer class revenue to cost ratios. The following section sets out VECC's final submissions regarding this aspect of the Application.

#### **2 Revenue to Cost Ratio Adjustments**

- 2.1 VECC has reviewed the revenue to cost ratio adjustments proposed by Innisfil and submits that:
- The adjustments are in accordance with the Board's EB-2008-0233 Decision, and
  - The Revenue-Cost Ratio Adjustment Work Form has been completed appropriately.

#### **3 Recovery of Reasonably Incurred Costs**

- 3.1 VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an award of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

All of which is respectfully submitted this 19<sup>th</sup> day of January 2011.