



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

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

January 20, 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-2010-0082  
Essex Powerlines Corporation – 2011 Electricity Distribution Rate  
Application**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition (VECC) in the above noted proceeding. We are filing these submissions now despite the extension in the procedural order as our submissions are limited to the issue of the proposed revenue to cost ratios, which are not, we believe, affected by the proposed filings for which the extension was granted.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

cc: Mr. Richard Dimmel  
Essex Powerlines Corporation

**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 Essex Powerlines Corporation 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 20, 2011**

**Michael Buonaguro**  
**Public Interest Advocacy Centre**  
34 King Street East  
Suite 1102  
Toronto, Ontario  
M5C 2X8

Tel: 416-767-1666  
E-mail: [mbuonaguro@piac.ca](mailto:mbuonaguro@piac.ca)

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

### **Final Argument**

#### **1 The Application**

- 1.1 Essex Powerlines Corporation ("Essex") 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, Essex 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 In response to interrogatories<sup>1</sup> from VECC and Board Staff COLLUS has clarified the basis for the 2010 rates to be used and incorporated the transformer ownership allowance in the determination of base distribution revenues. With these clarifications and corrections, VECC submits that:
- The adjustments are in accordance with the Board's EB-2009-0143 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 20<sup>th</sup> day of January 2011.

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<sup>1</sup> VECC #1 & #2 and Board Staff #1 and #2