



***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 25, 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-2010-0102
North Bay Hydro Distribution 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: Mr. Todd Wilcox
North Bay Hydro Distribution 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 North Bay Hydro Distribution 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 25, 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**

Vulnerable Energy Consumers Coalition (VECC)
Final Argument

1 The Application

- 1.1 North Bay Hydro Distribution Limited (“North Bay”, “the Applicant,” or “the Utility”) filed an application (“the Application”) with the Ontario Energy Board (“the Board” or “the OEB”), 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 3rd Generation Incentive Regulation, which provide for a formulaic adjustment to distribution rates and related charges.
- 1.2 As part of its Application, North Bay 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 Ratios

- 2.1 In response to the interrogatories¹ North Bay has verified the basis for the 2010 revenue to cost ratios and the transformer allowance adjustment used in the Application. VECC has reviewed the revenue to cost ratio adjustments proposed by North Bay and submits that:
- The adjustments are in accordance with the Board’s EB-2009-0270 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 and has provided ratepayer input to the review of the LRAM Claim.. Accordingly, VECC requests an award of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

¹ Board Staff #2 and #3

All of which is respectfully submitted this 25th day of January 2011