



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

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January 26, 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-2010-0068
Cambridge and North Dumfries Hydro Inc. – 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. John Grotheer
Cambridge and North Dumfries Hydro Inc.

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 Cambridge and North Dumfries Hydro Inc. 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 26, 2011

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Vulnerable Energy Consumers Coalition (VECC)
Final Argument

1 The Application

- 1.1 Cambridge and North Dumfries Hydro Inc. (“Cambridge”) 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 VECC notes that Cambridge appears to have completed the Worksheet C1.3 (Transformer Allowance) incorrectly (i.e., input the total billing kW as opposed to the kW eligible for the discount) and not used the approved discount. However, it appears that (despite these errors) the Worksheet calculates the appropriate rates for the GS 50-999 and GS 1,000-4,999 classes. Subject to confirmation (and correction) by Cambridge that this is the case, VECC submits that:
- The adjustments are in accordance with the Board’s EB-2009-0260 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.

All of which is respectfully submitted this 26th day of January 2011