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February 23, 2011

Aird & Berlis LLP Suite 1800, P.O. Box 754 Brookfield Place, 181 Bay Street Toronto, ON M5J 2T9

Attention: Fred Cass, Counsel to Ontario Power Authority (OPA)

Dear Mr. Cass:

## Re: Request to Reconsider Response to Low-Income Energy Network (LIEN) Interrogatory 10 Board File No. EB-2010-0279 Ontario Power Authority Proposed Fiscal 2011 Expenditure and Revenue Requirement

As you know, we are counsel to the Low-Income Energy Network (LIEN). We appreciate the OPA's detailed responses to LIEN's Interrogatories.

We request that the OPA reconsider its response to LIEN's Interrogatory 10. LIEN asked the OPA to describe each of the CDM programs for which the OPA partnered with Social Housing Services Corporation (SHSC), a member of LIEN, for the purposes as set out in the Memorandum of Understanding (MOU) in effect from December 22, 2005 to December 31, 2007. Further, LIEN requested that the OPA describe how the OPA fulfilled this MOU and why the OPA did not renew the MOU in 2008 and beyond. The OPA declined to answer LIEN interrogatory no. 10

The information sought by LIEN and SHSC would be helpful to the Ontario Energy Board (Board) when assessing the OPA's expenditure and revenue requirement in this proceeding.

SHSC has a wealth of experience and information available to assist the OPA in undertaking studies relating to social housing. SHSC could save the OPA from spending considerable funds to ascertain information available through SHSC. Further, by partnering with SHSC and taking advantage of SHSC's services, the OPA can share administration costs with SHSC.



For the reasons above, we ask that the OPA please reconsider its response.

Yours truly,

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Juli Abouchar Partner Certified as a Specialist in Environmental Law by the Law Society of Upper Canada

cc: client OEB attention: Batul Rahimtoola, Case Administrator OEB attention: Kirsten Walli, Board Secretary

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