



February 28, 2011

Ontario Energy Board
P. O. Box 2319
2300 Yonge Street
27th Floor
Toronto, Ontario M4P 1E4

Attention: Ms. Kirsten Walli
Board Secretary

Dear Ms. Walli:

Re: 2011 Incentive Regulation Mechanism ("IRM") Distribution Rate Application
(EB-2010-0082) and Late Payment Generic Proceeding (EB-2010-0295)

Essex Powerlines received direction from the Board with regard to the Late Payment Generic Proceeding (EB-2010-0295) to recover the costs from customers based on 2009 RRR filing data. Essex would like to request that they use the customer data submitted during its 2010 cost of service application due to the change in the number of connections for the Street Lighting and Sentinel Lighting classes.

To use the 2009 RRR filing customer counts would result in the street light and sentinel lighting classes being under recovered. The 2009 RRR filing reported street light connections of 7,674 that were reduced to 2,643 in the 2010 cost of service proceeding. The 2009 RRR filing reported sentinel light connections of 393 that were reduced to 168 in the 2010 cost of service proceeding. Our billing systems have been adjusted to collect charges based on this new connection count. To assess costs and apply them based on the 2009 filing would result in an under-recovery overall and in particular in the street light and sentinel light customer classes. Please provide approval for Essex to recover the Late Payment assessment charges based on the 2010 cost of service connection counts for the street light and sentinel light customer classes.

Yours very truly

A handwritten signature in black ink, appearing to read "RE Dimmel". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Richard E. Dimmel
General Manager