



April 13, 2011

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

**Attention: Ms. Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: 2011 IRM Rate Application  
EB-2010-0079  
Submissions on Rate Model**

In the Board's Decision and Order, the Board invited EnWin to review the Board's rate models and draft Tariff of Rates and Charges. Enclosed are EnWin's concerns:

- 1) In the Revenue-to-Cost Ratio Model on Tab C1.5, it appears that the Proposed Revenue-to-Cost Ratio for General Service 50-4,999 kW has been modified from 1.33 to 1.32. This changes the impact of the R/C Ratio adjustments from \$0 to \$22,266. EnWin requests that the Board revise the model such that the net impact is \$0 in order to preserve the principle that LDCs should be held neutral during R/C Ratio adjustments.
- 2) In the Tax Model on Tab B1.1, it appears that several (but not all) of the Proposed Rate ReBal Base Service Charges in column D have been modified. It is not apparent to EnWin why these modifications were made for some rate classes and not others. EnWin requests that the Board review the entries in this column to ensure that the modified (and unmodified) entries are correct.
- 3) In the Tax Model on Tab J2.7, it appears that the applied for Rate Riders have changed for the Intermediate, Large Use Regular, Large Use 3TS and Large Use Ford Annex Classes. It is not clear to EnWin why these Rate Riders would differ from those sought in the Application. EnWin requests that the Board review the model to ensure the calculated Rate Riders are correct.
- 4) In the draft Tariff, the Rate Rider for Recovery of Late Payment Penalty Litigation Costs should be on a "per connection" basis for the Unmetered Scattered Load Service Class, the Sentinel Lighting Service Class, and the Street Lighting Service Class.

Other than the above noted items, the Rate Tariff and underlying Models appear to be correct.

As a separate matter, EnWin has received and reviewed the VECC cost claim and does not object to that claim.

Yours very truly,

**EnWin Utilities Ltd.**



Per: Andrew J. Sasso  
Director, Regulatory Affairs