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BY E-MAIL

April 18, 2011

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Ste. 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Hydro One Brampton Networks Inc.
2011 Distribution Rate Application
Comments on Draft Rate Order
Board File No. EB-2010-0132**

Please find attached Board Staff's comments on draft Rate Order filed by Hydro One Brampton Networks Inc. on April 11, 2011. Please forward the comments to Hydro One Brampton Networks Inc. and to all other registered parties to this proceeding.

Sincerely,

Original signed by

Silvan Cheung
Advisor – Applications & Regulatory Audit

Encl.

**Hydro One Brampton Networks Inc. (“HOBNI”)
2011 Cost of Service (EB-2010-0132)**

Board Staff Comments on Draft Rate Order

On April 4, 2011, the Board issued its Decision on HOBNI’s rate application. The Decision required the Applicant to submit its draft Rate Order within seven days of the issuance of the Decision. The Applicant submitted its draft Rate Order and supporting documentation on April 11, 2011. Board staff submits that HOBNI has appropriately reflected the Board’s findings in all areas except for the two noted below.

Tariff of Rates and Charges

Board staff notes that in Appendix A of the draft Rate Order, two rate riders, the Global Adjustment Sub-Account Disposition and the Deferral/Variance Account Disposition (2010), appear for the Unmetered Scattered Load Service (“USL”) class. Staff notes that these two rate riders were not listed on the current (2010) Tariff of Rates and Charges. Board staff submits that HOBNI should provide an explanation as to why these riders appear on the proposed 2011 Tariff when they appear to relate to the deferral and variance account disposition from the 2010 IRM application (EB-2009-0199) for which the Board did not approve separate rate riders for the USL class.

Green Energy Act Plan

Board staff notes that HOBNI provided the revised revenue requirement for Green Energy Plan expenditures in Appendix I. However, HOBNI did not provide the revenue requirement for the provincial ratepayer’s share. Board staff submits that the revenue requirement for the provincial ratepayer’s share (similar to Appendix I) should be provided in its response.

- All of which is respectfully submitted -