

May 3, 2011

EB-2010-0102

Ontario Energy Board
27 - 2300 Yonge Street
Toronto, ON
M4P 1E4

Attn: Board Secretary

Dear Ms. Walli:

Re: North Bay Hydro Distribution Ltd. Application for 2011 Electricity Distribution Rates Objections to the Cost Claim submitted by D. D. Rennick

I submit that the claim for costs in the above-noted matter is reasonable and should be allowed for the following reasons;

1. My interests as an individual ratepayer of North Bay Hydro Distribution Limited (NBHDL) and the direct interests of consumers of NBHDL are substantially the same. To suggest that I can not represent the direct interest of consumers in relation to the cost of regulated services without providing some type of additional evidence is not helpful.
2. A consultant is a professional who provides professional or expert advice in a particular area. My degree as a Chartered Accountant (1966) certainly qualifies me as an expert in the areas of accountancy and finance. In addition, my 30 years of business experience have provided me with the expertise to intervene in this matter on a level with other intervenors.
3. NBHDL has indicated that the complexity of the regulatory industry disqualifies me as an expert or a consultant. I understand that it is in management's interest to promote this picture but the fact of the matter is that the delivery of electricity is not a very complex task and the adoption of this type of condescending attitude to make a point is annoying.
4. I note that the Shared Tax Savings finally arrived at after the initial attempts by NBHDL and OEB board staff is the amount that I suggested in my filing of December 28, 2010.
5. The hourly rate requested is well below the range of \$170 - \$330 allowed by the Ontario Energy Board's Practice Direction on Cost Orders and as such is reasonable.
6. I meet the Cost Eligibility criteria of Section 3 and have followed the Cost Eligibility Process of Section 4 and have maintained the Principles in Awarding Costs of Section 5 of the Ontario Energy Board's Practice Direction on Cost Orders.

7. I suggest that the objection of NBHDL to my request for costs is without merit and ask that the claim be allowed as filed.

All of which is respectfully submitted.

I will forward hard copies of this submission by mail and an electronic copy of in PDF format will be submitted through the Ontario Energy Board's RESS.

E-mails will be sent to the following:

North Bay Hydro Distribution Limited
Todd Wilcox,

Vulnerable Energy Consumers Coalition
Michael Buonaguro

Yours very truly,

D. D. Rennick, C.A.