

**Final Submission**  
**2011 IRM3 Electricity Distribution Rates**  
**Norfolk Power Distribution Inc.**  
**EB-2011-0049**

**Introduction**

On March 21, 2011 Norfolk Power Distribution Inc. (Norfolk) filed an application with the Ontario Energy Board (the “Board”) seeking approval for changes in distribution rates, effective May 1, 2011. The application is based on the 2011 3<sup>rd</sup> Generation Incentive Regulation Mechanism (IRM3).

As part of its application Norfolk requested that its currently approved Rates and Charges be declared interim. On April 19, 2011 the Board ordered Norfolk’s current Tariff or Rates and Charges to be made interim as of May 1, 2011.

Norfolk received interrogatories from Board Staff and the Vulnerable Energy Consumers Coalition (VECC). Norfolk provided responses to the interrogatories on April 20, 2011.

On April 27, 2011 Norfolk received a Submission from Board Staff. Norfolk has not received any other Submissions. Norfolk provides the following Reply Submission in regards to the interrogatories and Submission received.

**Submission**

**Application Models**

Board Staff provided interrogatories seeking confirmation of certain data provided in the models submitted by Norfolk. Through this process certain errors were identified and Board Staff has indicated they will make corrections to the models at the time of the Board decision. Norfolk agrees with the process and thanks Board Staff for doing so.

### **Transmission Rates**

Norfolk notes that Board Staff supported Norfolk's proposed reallocation of transmission volumes and associated charges for the purpose of re-calibrating its RTSRs. The intent of the proposed reallocation is to minimize the accrual of balances in variance accounts 1584 and 1586, which would otherwise occur due to a change in Norfolk's distribution system that no longer requires it to be embedded to Haldimand County Hydro. No interrogatories were received on the proposed changes in rates. Norfolk therefore requests the rates be approved as submitted.

### **LRAM / SSM Recovery**

Norfolk received interrogatories from VECC regarding the LRAM/SSM portion of its application. Norfolk believes it has fully responded to the interrogatories. In its submission Board Staff supported the approval of the LRAM and SSM amounts sought for recovery.

Norfolk's application for the recovery of the LRAM and SSM amounts is consistent with Board Guidelines and Norfolk submits the application should be approved as submitted.

All of which is respectfully submitted.



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