

June 28, 2011

Ontario Energy Board Attn: Board Secretary's Office PO Box 2319 27th Floor, 2300 Yonge Street Toronto ON M4P 1E4

Re: E.L.K. Energy Inc.

2012 Electricity Distribution rates

Board File No. EB-2011-0099

As per the instruction of the letter of direction dated June 17, 2011 with regards to the 2012 Electricity Distribution Rates Board File No. EB-2011-0099, we submit:

E.L.K.'s return on equity and return on rate base for both 2009 and 2010 on both actual and deemed capital structures.

The return levels are believed to be above the level that underpins E.L.K.'s rates. It is nonetheless appropriate for the Board to defer rebasing of E.L.K.'s rates due to the significant implementation of smart metering infrastructure and the associated time of use pricing mandated by September 2011. E.L.K. Energy is currently in the midst of full enrollment testing. In addition, the maternity leave of the Director of Finance and Regulatory Affairs who would be a key contributor to the rate rebasing application with over ten years experience in the industry would have a direct impact on the rate rebasing application.

Please do not hesitate to contact me if I can be of further assistance:

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Mark Danelon, CA

Manager, Finance & Regulatory Affairs



Calculation Made from the Audited Financial Statement for E.L.K. Energy Inc. as follows:

	2010	2009
Net Income after tax	1,178,049	983,399
Shareholder's Equity	7,385,706	6,207,657
Return on Equity	16%	16%



Name of LDC: E.L.K. Energy Inc.

OEB Licence Number: ED-2003-0015

IRM Year One	2009
GDP-IPI Less Productivity	2.30% -1.00%
IRM Price Cap Adjustment	1.30%

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Distributors Rate Base	2009 IRM Yea	ar Three Improvement
Average Net Fixed Assets		
Average Gross Fixed Assets		\$ 8,259,194
Average Accumulated Depreciation		\$ -
Average Net Fixed Assets		\$ 8,259,194
Working Capital Allowance	\$	
Working Capital Allowance Base	ъ 15,535,838	
Working Capital Allowance Rate	15%	
Working Capital Allowance		\$ 2,330,376
Rate Base		\$ 10,589,570
Return on Rate Base		
Deemed ShortTerm Debt %	0.00%	\$ \$
Deemed Long Term Debt %	56.70%	\$ 6,004,286 \$
Deemed Equity %	43.30%	4,585,284
Short Term Interest	0.00%	\$
Long Term Interest	7.25%	\$



Return on Equity

Return on Rate Base

9.00%

435,311 412,676 847,986

OFF Ramp Test using ROE at time of rebasing

	\$
Rate Base	10,589,570
Deemed Equity %	43.30%
Return on Equity ROE at time of rebasing	9.00%
Off Ramp Dead Band - Upper +3.0%	12.00%
Off Ramp Dead Band - Lower -3.0%	6.00%

Maximum Allowed Return

Minimum Allowed Return

OFF Ramp Test using ROE for 2009 COS

	\$
Rate Base	10,589,570
Deemed Equity %	43.30%
Return on Equity ROE using ROE for 2009 COS	8.01%
Off Ramp Dead Band - Upper +3.0%	11.01%
Off Ramp Dead Band - Lower -3.0%	5.01%

Maximum Allowed Return

229,723 **Minimum Allowed Return**



Name of LDC: E.L.K. Energy Inc. **OEB Licence Number:** ED-2003-0015

2010 **IRM Year One GDP-IPI** 1.30% **Less Productivity** -1.00% **IRM Price Cap Adjustment** 0.30%

Distributors Rate Base	2010 IRM	Year Four Improvement
Average Net Fixed Assets		
Average Gross Fixed Assets		\$ 8,283,972
Average Accumulated Depreciation		\$ -
Average Net Fixed Assets		\$ 8,283,972
Working Capital Allowance		
Working Capital Allowance Base Working Capital Allowance Rate	\$ 15,582,446 15%	
Working Capital Allowance		\$ 2,337,367
Rate Base		\$ 10,621,339
Return on Rate Base]	
Deemed ShortTerm Debt %	0.00%	\$ \$
Deemed Long Term Debt %	60.00%	\$ 6,372,803 \$
Deemed Equity %	40.00%	4,248,535
Short Term Interest	0.00%	\$ \$
Long Term Interest	7.25%	462,028
Return on Equity	9.00%	\$ 382,368
Return on Rate Base		\$ 844,396

OFF Ramp Test using ROE at time of rebasing

	\$
Rate Base	10,621,339
Deemed Equity %	40.00%
Return on Equity ROE at time of rebasing	9.00%
Off Ramp Dead Band - Upper +3.0%	12.00%
Off Ramp Dead Band - Lower -3.0%	6.00%



Maximum Allowed Return

Minimum Allowed Return

OFF Ramp Test using ROE for 2010 COS

Rate Base 10,621,339 **Deemed Equity %** 40.00% Return on Equity ROE using ROE for 2010 COS 9.85% Off Ramp Dead Band - Upper +3.0% 12.85% Off Ramp Dead Band - Lower -3.0% 6.85%

545,937 **Maximum Allowed Return**

291,025 Minimum Allowed Return