

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624

E-mail: randy.aiken@sympatico.ca

July 18, 2011

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

Dear Ms. Walli:

Re: EB-2010-0142 - THESL Draft Rate Order - BOMA's Comments

The Building Owners and Managers Association of the Greater Toronto Area ("BOMA") has reviewed the Draft Rate Order ("DRO") distributed by THESL on July 14, 2011. BOMA has no concerns with respect to the calculation of the revenue requirement or any of the revenue to cost ratio adjustments.

BOMA has also reviewed the comments of VECC filed earlier today and notes VECC's concern about recovering the revenue shortfall from a rate class (residential) that already has a higher revenue to cost ratio than other rate classes (Streetlighting and USL).

While having no direct impact on BOMA members in this circumstance, BOMA supports the position of VECC. When adjustments are needed for rate classes that are already within the Board approved ranges, BOMA submits that increases should be made to those classes that have the lowest ratios, until they move up to match the second lowest set of ratios. These classes should then be moved up in tandem until they reach the third lowest and so on. Similarly, if adjustments are needed that reduce the revenue to cost ratios because of a class or classes moving to the bottom of their respective ranges, then BOMA submits that the decreases should first apply to the rate class with the highest ratio. When this ratio is reduced to match the second highest ratio, then both classes should be lowered in tandem, and so on.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. Glen Winn, THESL