



ECMI
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Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4
ATT: Kirsten Walli, Secretary

February 25, 2008.

Dear Ms. Walli,

**Revised Proposed Amendments to the Affiliate Relationships Code for
Electricity Distributors and Transmitters
Board File No: EB-2007-0662**

In accordance with the OEB's e-mail and web posting of February 11, 2008 ECMI submits its comments on the Revised Proposed Amendments to the Affiliate Relationships Code for Electricity Distributors and Transmitters, also dated February 11, 2008.

Three paper copies are enclosed. Electronic copies in both Adobe Acrobat and Word have been sent this date to boardsec@oeb.gov.on.ca.

Requested contact details are as follows:-

Roger White, President
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Respectfully submitted for the Board's consideration,

Original signed by R. White

Roger White
President

**ECMI comments on
Revised Proposed Amendments to the Affiliate Relationships Code for
Electricity Distributors and Transmitters
Board File No: EB-2007-0662**

1. GENERAL AND ADMINISTRATIVE PROVISIONS,
Section 1.1 Purpose of the Code

b) preventing a utility from cross-subsidizing affiliate activities;

The proposed changes to 1.1 b appear to create confusion. ECMI suggests that the following wording be considered as it may be clearer with the apparent intent of the draft Code.

b) " preventing a utility from cross subsidizing NON-CONTRACTED activities OF an affiliate";

Further, ECMI has included the draft Code word "preventing" in this definition because ECMI assumes that the authors of the draft Code have rejected ECMI's earlier submission on the absolute standards that the word "preventing" creates. (See ECMI submission date October 25, 2007).