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June 21, 2012

BY EMAIL & COURIER

Ms. Kirsten Walli **Board Secretary** Ontario Energy Board 2300 Yonge St, Suite 2701 Toronto ON M4P 1E4

Dear Ms. Walli:

## **Board File No. EB-2012-0033** Enersource Hydro Mississauga Inc. – 2013 & 2014 Cost of Service Application **Energy Probe – Comments on Draft Issues List**

Pursuant to Procedural Order No. 1, issued on June 14, 2012, this letter constitutes the submissions of Energy Probe Research Foundation (Energy Probe) for the Board's consideration in respect of the Draft Issues List circulated as Appendix B.

Issue 1.1 misses the point that the current third generation IRM approach effectively sets rates for four years – the COS rebasing year, followed by three years of IRM price cap. The Issue as stated does not address years 3 and 4 of the cycle; it implies that the Applicant can set rates for only two years and then come back in again.

To complete the record, Energy Probe submits there should be an additional issue added to the **Issues List:** 

"What is the appropriate approach to set rates for years 3 and 4 of the 4 year third generation IRM rate setting cycle?"

Under Rate Base, Energy Probe suggests an additional issue should be added to the Issues List:

"Is the Working Capital Requirement, or lead/lag, study appropriate?"

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Energy Probe has reviewed the submissions of the School Energy Coalition (SEC) in their letter to the Board filed earlier today and is in agreement with the SEC comments on the Draft Issues List, including SEC submissions on the Applicant's proposal for cost of service rates for 2014, being treated as a threshold issue.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh Case Manager

Swidt to the

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