



PUBLIC INTEREST ADVOCACY CENTRE
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July 17, 2012

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: EB-2012-0161 PowerStream Inc.

VECC makes the following submissions in respect to the issues list proposed in Procedural Order No. 1 (July 6, 2012).

In VECC view, the Board should use a standard issues list. This list should only be modified for unique features of an application. Both Ottawa Hydro Limited's 2012 cost of service rate case (EB-2011-054) and Enersource Inc.'s 2013 rate application (EB-2012-0033) use slightly variant forms of a standard issues list. Most of the difference in the issues of these two applications relate to material differences in their proposals.

The use of semantically different forms of issues list that do not convey any substantive difference to the standard cost of service application can lead to unnecessary arguments and make it more difficult for parties to discern whether an application contains any unique proposals (as is the case for example in the Enersource application).

The Ottawa Hydro Issues list approved by the Board provides a comprehensive form of an issues list and should, in VECC's submission, be used as a standard form. The unique issues in this application are: (1) rate year change; (2) rate harmonization; and (3) no LRAM/SSM proposal. The standard form issues list should be modified for these issues.

VECC also takes the position that at the beginning of the process the issues list should interpreted broadly. It is our experience that as the evidence is examined in detail the scope of the issues narrow naturally during the course of the proceeding.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', with a long horizontal stroke extending to the right.

Michael Janigan
Counsel for VECC

Encl.
cc. PowerStream Inc.
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