

January 28, 2013

Ontario Energy Board  
P.O. Box 2319  
27th Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Norfolk Power Distribution Inc.  
2013 IRM3 Distribution Rate Application  
EB-2012-0151  
Reply Submission**

In accordance with the Notice of Application and Hearing, please find attached Norfolk's Reply Submission in the above proceeding.

Sincerely,



Jody McEachran  
Interim President & CEO

**Reply Submission  
Norfolk Power Distribution Inc.  
2013 IRM3 Rate Application  
EB-2012-0151**

**Introduction**

Norfolk Power Distribution Inc. (“Norfolk”) filed an application with the Ontario Energy Board (the “Board”) on October 12, 2012, seeking approval for changes to its distribution rates, to be effective May 1, 2013.

On December 14, 2012 Norfolk responded to interrogatories from Board Staff and the Vulnerable Energy Consumers Coalition (VECC). Based on interrogatories from Board Staff Norfolk made revisions to its Tax-Savings Workform and other models and resubmitted these to the Board with its interrogatory responses.

On January 14, 2013 Norfolk received a submission from Board Staff. Norfolk has not received any other submissions.

Norfolk provides the following reply submission in regards to the interrogatories and submission received.

**Submission**

In its submission Board Staff commented on the following issues raised in its interrogatories and addressed by Norfolk in its responses:

- Norfolk’s revised Tax-Savings Workform
- Proposed RTSRs including removal of RTSRs from the Embedded Distributor Class
- Disposition of Group 1 Variance Accounts, including a proposal to omit the Embedded Distributor Class from disposition of accounts 1584 and 1586.

Norfolk notes that for each of the above, Board Staff have indicated they do not have an issue with the manner in which Norfolk has addressed them in its application and interrogatory responses. However, as Board Staff indicated, it is noted that Norfolk’s application will be updated at the time of the Board’s decision based on any available updated Uniform Transmission Rates.

Norfolk received interrogatories from VECC regarding the LRAM/SSM and LRAMVA portion of its application. Norfolk believes it has fully responded to the interrogatories and has made its application consistent with Board Guidelines.

Norfolk therefore submits the application be approved as submitted.

All of which is respectfully submitted