



PUBLIC INTEREST ADVOCACY CENTRE
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Michael Janigan
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January 29, 2013

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: Vulnerable Energy Consumers Coalition (VECC)
Haldimand County Hydro Inc. EB-2012-0129
Final Submissions of VECC

Please find enclosed the submissions of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Janigan
Counsel for VECC
Encl.

cc: Haldimand County Hydro Inc.
Lloyd Payne

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by Haldimand County Hydro Inc. for an order or orders approving or fixing just and reasonable distribution rates to be effective May 1, 2013.

FINAL SUBMISSIONS

On Behalf of The

Vulnerable Energy Consumers Coalition (VECC)

January 29, 2013

Public Interest Advocacy Centre

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Vulnerable Energy Consumers Coalition (VECC)

Final Argument

1 The Application

- 1.1 Haldimand County Hydro Inc. (“HCHI”, “the Applicant”, or “the Utility”) filed an application (“the Application”) with the Ontario Energy Board (“the Board” or “the OEB”), under section 78 of the *Ontario Energy Board Act, 1998* for electricity distribution rates effective May 1, 2013. The Application was filed in accordance with the OEB’s guidelines for 3rd Generation Incentive Regulation which provides for a mechanistic and formulaic adjustment to distribution rates between cost of service applications.
- 1.2 As part of its application, HCHI included an adjustment to the fixed and variable charges for the Residential customer class. The following section sets out VECC’s final submissions regarding this aspect of the application.

2 Fixed and Variable Charge Adjustments

- 2.1 In HCHI’s last cost of service application (EB-2009-0265) in 2010, HCHI proposed to change the fixed/variable ratio of the distribution revenue attributable to the Residential customer class from the existing 32% fixed/68% variable to 47% fixed/53% variable in the 2010 rate year. The parties agreed during the settlement conference that for the 2010 rate year the existing fixed/variable ratio would apply, with the increase to the proposed fixed variable split ratio to occur equally in increments of 5% over each of the subsequent three rate years, resulting in a 47% fixed/53% variable ratio in 2013 as shown in the table below.¹

	2010	2011	2012	2013
Fixed	32.14%	37%	42%	47%
Variable	67.86%	63%	58%	53%

- 2.2 VECC has reviewed the fixed and variable adjustments in 2013 proposed by HCHI for the Residential customer class and submits the adjustments are in accordance with EB-2009-0265 and have been implemented appropriately.

3 Recovery of Reasonably Incurred Costs

- 3.1 VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an order of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

¹ Application, Manager’s Summary, Pages 6-7

All of which is respectfully submitted this 29th day of January 2013.