

January 30, 2013

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

## Re: Applications for 2014 Electricity Rates

On December 11, 2012, the Board issued a letter to all electricity distributors requesting certain information by February 1, 2013 in respect of the distributors' applications for 2014 distribution rates.

As the Board is also aware, EnWin last filed a rate application according to the cost of service methodology in September 2008 for rates effective May 2009 ("2009 COS"). EnWin was originally scheduled to file its next cost of service rate application in the summer of 2012 for rates effective May 2013, but was granted a one year deferral by the Board. In 2012, EnWin filed a rate application for 2013 rates according to the 3GIRM methodology. As set out in the Board's Notice of Application, that application "only made proposals of a mechanistic nature within the Board's guidelines."

Presently, EnWin is on the Board's 2014 Rebasing List, which is for distributors scheduled to file a cost of service rate application in 2013 for rates effective in 2014 ("2014 COS").

EnWin's plan for 2014 rates is being reassessed, taking into account:

- 1. The on-going economic hardship facing Windsor, as illustrated by persistently high unemployment for the past 5 years, which requires a delicate balancing of grid sustainment to support new and remaining industry, while holding the line to on rates to the extent possible for residents and businesses alike;
- 2. The Board's mounting cost of service filing requirements and hearing procedures and thus the mounting expenses to prepare various studies and reports to prepare and present the application;
- EnWin's success in finding efficiencies, as illustrated by the fact that distribution rates for a Residential ratepayer were \$32 in May 2006 and are expected to be \$32 in May 2013, all the while delivering strong operational and financial performance; and,

4. The Board's Renewed Regulatory Framework for Electricity Report ("RRFE Report") issued on October 18, 2012, which makes available 3 filing options, including an Annual Incentive Rate-setting ("Annual IR") methodology, which would allow EnWin to continue to hold the line on distribution rates for another year or more.

This reassessment of Windsor's wants and needs and how EnWin can best address them is on-going. The suitability of the nascent regulatory mechanisms that are currently being developed by the Board through the RRFE Report's working group and consultation process will play a significant role in influencing EnWin's decision.

EnWin expects that it will either file a 2014 COS or a 2014 Annual IR. EnWin understands that the Board has requested that distributors make that choice no later than April 26, 2013. EnWin will endeavour to meet that filing date, though the timing of EnWin's filing should be expected to depend on the timing of the finalization of the RRFE Report implementation details.

In addition to filing this letter with the Board, EnWin is also providing it to the active Intervenors from EnWin's 2009 COS. If the Board or any Intervenor has feedback on EnWin's selection of filing methodology for its application for 2014 rates, that feedback would be an appreciated contribution to the on-going reassessment.

Yours very truly, **ENWIN Utilities Ltd.** 

Per: Andrew J. Sasso

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cc: Association of Major Power Consumers in Ontario Consumers Council of Canada Ford Motor Company School Energy Coalition Vulnerable Energy Consumers Coalition