



PUBLIC INTEREST ADVOCACY CENTRE

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March 1, 2013

VIA EMAIL & Mail

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

Dear Ms.Walli:

**Re: Board File No. EB-2012-0342 - Natural Resource Gas Limited
Application for 2012 Rates under the Incentive Regulation Mechanism
Vulnerable Energy Consumers Coalition (VECC)
Comments on Draft Rate Order**

On February 7, 2013, the Board issued its Decision and Order on the referenced application. Among other things, the Board directed that NRG file with the Board and intervenors, a Draft Rate Order ("DRO") within 14 days of the decision. The Decision and Order also required that comments on the DRO be filed within 7 days of the filing of the DRO.

Although VECC has no record of having received a copy of the DRO, in checking the OEB website it became apparent that NRG filed the DRO with the OEB on February 12, 2013. Pursuant to discussion by e-mail with Board Staff, it appears that it was a simple oversight that VECC was not copied with the DRO. VECC first became aware of the DRO on February 27, 2013.

VECC therefore respectfully requests that its comments on the DRO be accepted for consideration at this time.

VECC first notes that while it can access the DRO in pdf format on the Board's website it is unable to open the Microsoft Excel formatted document on the website. Therefore VECC has performed its review based on the pdf document.

VECC requests that it be provided a copy of the Excel document.

VECC has focussed on the DRO with respect to the rates for and impacts upon Rate 1 Residential delivery bills.

VECC has reviewed the calculations for the volumetric adjustments and the calculations of the deferred revenue recovery rate rider and the shared tax savings rate rider and is satisfied with these calculations in respect of Rate 1 Residential customers with one caveat: VECC is unable

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to confirm the calculation of the "Current Revenue Requirement" of \$5,580,347 which first appears on page 2 of 3 on the DRO and appears frequently thereafter in the Attachments to the DRO. In checking the calculations, VECC has assumed that this figure is correct and bases its acceptance of the rate calculations on this assumption. VECC would appreciate an explanation as to how this "Current Revenue Requirement" has been calculated.

Thank you.

Yours truly,



Michael Janigan
Counsel for VECC

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Richard King, Counsel - richard.king@nortonrose.com