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November 5, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON, M4P 1E4

Re: Request for an Accounting Decision Change EB-2011-0176 - Innisfil Hydro Distribution Systems Limited ("IHDSL")

Dear Ms. Walli:

In IHDSL's 2012 IRM EB-2011-0176 Decision and Order, the Board approved a 2010 LRAM Claim of \$10,466.00 (consisting of \$10,185.48 for LRAM and \$280.38 for carrying charges). The Decision and Order directed IHDSL to record the debit amount of \$10,466.00 in Account 1595 for future disposition as the calculated rate riders associated with the claim were not material. IHDSL has recorded the LRAM debit amount in account 1595 as directed.

On April 26, 2011 updated Guidelines for Electricity Distributor - Conservation and Demand Management were issued which introduced the LRAMVA variance account of 1568. IHDSL prepared its LRAM calculation for the 2011 CDM results with its COS application EB-2011-0139 and recorded the calculated amount to Account 1568.

IHDSL understands that the timing of the 2012 decision preceded the updated Conservation and Demand Management Guidelines issued on April 26, 2011, however with the 2010 LRAM recorded in Account 1595 and the 2011 LRAM recorded in Account 1568, IHDSL has inconsistencies in recording LRAM. Furthermore, with the 2010 LRAM amount recorded in Account 1595, IHDSL will not be in a position to request disposition of this amount until our next rebasing in 2017.

With the clarifications now outlined in the Conservation and Demand Management Guidelines for LRAMVA, IHDSL is respectfully requesting that the Board consider an Accounting Decision Change for EB-2011-0176 to transfer the 2010 LRAM amount of \$10,466.00 from Account 1595 to Account 1568.

I would be pleased to provide any further information on this request.

Respectfully submitted,

A handwritten signature in blue ink that reads "Brenda L Pinke".

Brenda L Pinke
Regulatory/Conservation Manager

c: Laurie Ann Cooledge, CFO/Treasurer Innisfil Hydro Distribution Systems Limited