

December 2, 2013

Board Secretary Ontario Energy Board P.O. Box 2319 27<sup>th</sup> Floor 2300 Yonge Street Toronto ON M4P 1E4

## Re: Orangeville Hydro Limited 2014 Rate Application EB-2013-0160 Procedural Order No. 1 Comments

Dear Ms. Walli:

Orangeville Hydro Limited ("OHL") is filing these comments in accordance with Procedural Order No. 1 in the above noted matter.

OHL notes that the draft Issues List differs from the form of issues list the Board has adopted in cost of service applications for electricity distributors in previous years. OHL understands that this is due to the Board's new approach to rates as set out in the RRFE. OHL has prepared its application in accordance with the RRFE, and is prepared to accept the draft Issues List without change on that basis.

However, OHL notes that this is its first application under the RRFE and that no other LDCs have brought an application under the RRFE before now. OHL respectfully requests that the Board take these facts into consideration when assessing any of the new issues arising under the RRFE.

Further to the Board's RESS filing guidelines, an electronic copy of our comments has been submitted through the OEB e-Filing Services. Two hard copies of our comments are being sent by courier. If you have any questions, please do not hesitate to contact me at 519-942-8000 or jhoward@orangevillehydro.on.ca.

Orangeville Hydro Limited

read

Jan Howard Manager of Finance & Rates