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April 11, 2014

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2013-0155**  
**Niagara-on-the-Lake Hydro Inc. – 2014 Cost of Service Application**  
**Energy Probe – Comments on Draft Rate Order**

Pursuant to the Decision and Order, April 3, 2014 please find attached the Comments of Energy Probe Research Foundation (Energy Probe) in respect of the Draft Rate Order in the EB-2013-0155 proceeding for consideration of the Board.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: Jim Huntingdon, Niagara-on-the-Lake Hydro (By email)  
Philip Wormwell, Niagara-on-the-Lake Hydro (By email)  
Randy Aiken, Aiken & Associates (By email)  
Parties of Interest (By email)

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Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: [EnergyProbe@nextcity.com](mailto:EnergyProbe@nextcity.com) Internet: [www.EnergyProbe.org](http://www.EnergyProbe.org)

**Ontario Energy Board**

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

**AND IN THE MATTER OF** an application by Niagara-on-  
the-Lake Hydro Inc. for an order approving just and reasonable  
rates and other charges for electricity distribution to be  
effective May 1, 2014.

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**COMMENTS ON DRAFT RATE ORDER OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

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**April 10, 2014**

**NIAGARA-ON-THE-LAKE HYDRO INC.  
2014 RATES REBASING CASE  
EB-2013-0155**

**ENERGY PROBE RESEARCH FOUNDATION  
DRAFT RATE ORDER COMMENTS**

The following are comments on the Draft Rate Order ("DRO") filed by Niagara-on-the-Lake Hydro Inc. ("NOTL") on April 9, 2014 and corrected on April 10, 2014. Energy Probe notes that it did pass on some comments to NOTL based on the original DRO received dated April 9, 2014, in order to resolve some issues of concern, with the intent of making the process as efficient as possible.

**A. Impact of Removal of Account 1535**

Energy Probe has reviewed the impact in the draft rate order that reflects the removal of Account 1535 from the proposed recovery through the deferral and variance account rate riders. Energy Probe submits that NOTL has correctly reflected the withdrawal of the request to recover the balance of \$133,025 in this account from the Revised Table 9.3.9 in the DRO. It is further submitted that the calculation of the resulting rate riders is accurate.

Energy Probe notes that there were no changes in the distribution rates required as a result of the Board's Decision from those that resulted from the Settlement Agreement, other than the withdrawal for the request to clean Account 1535 noted above.

**B. Rate Impacts & Rate Schedules**

Energy Probe reviewed the rate impact and rate schedules in some detail on a spot check basis and found some inconsistencies across the various schedules. These differences were communicated to NOTL and they have provided corrected schedules. Energy Probe believes these schedules are now accurate, but relies on a more detailed review by Board staff to ensure accuracy and completeness.