



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

December 09, 2014

VIA E-MAIL

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

Dear Ms. Walli:

Re: EB-2014-0113 – St. Thomas Energy Inc. Draft Rate Order Comments

VECC has reviewed the comments of Board Staff and Energy Probe with respect to the Draft Rate Order of St. Thomas Energy. We are in general agreement with the comments of those two parties.

With respect to the MicroFit Charge of \$10.00, VECC is of the view that the Applicant agreed to modify the charge from the original proposal of \$5.40 as part of the discussions at the Technical Conference of September 22, 2014.

As we understand the issue the increase is related to the pass-through of billing costs that are incurred by St. Thomas Energy Inc. in order to bill micro-fit customers. In the absence of the increase we understand that other rate classes would be in the position of subsidizing micro-fit customers.

Board Staff have noted that there is *"no evidence on the record that the individual customers were notified of this proposed change."* In our submission while this may be true it is not fatal to the Applicant's proposal. The Board's notice requirements do not typically require that all classes be notified of specific rate changes. In any event notice once published does not require the application remain *in situ*.

Yours truly,

Michael Janigan
Counsel for VECC

cc: St Thomas - Robert Kent - rkent@sttenergy.com
Counsel - Andrew Taylor - ataylor@energyboutique.ca

1204-ONE Nicholas Street, Ottawa, ON K1N 7B7 Tel: 613-562-4002 Fax: 613-562-0007 piac@piac.ca www.piac.ca
Michael Janigan - Direct: 31 Hillside Avenue E, Toronto, ON M4S 1T4 Tel: 416-840-3907 mjanigan@piac.ca