



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

January 12, 2018

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-2017-0061 Milton Hydro Distribution Inc.
2018 Price Cap Application
VECC Response to Objection to VECC as an Intervenor**

VECC filed a letter of intervention in the above proceeding on January 11, 2018. On January 11, 2018 Milton Hydro filed a letter of objection to VECC's intervention on the basis that the proposed Standby Charge is not applicable to low-income or vulnerable customers being those customers in the Residential or General Service < 50 kW customer classes.

In VECC's view the introduction of the standby rates will affect the revenues and hence revenue to cost ratios for the relevant classes. While this does not affect VECC's constituency (i.e. residential customers) during the IR period, it will affect the overall revenue to cost ratio calculations at the time of Milton Hydro's next rebasing and therefore the decisions made now as to what is the "appropriate" standby rate will affect residential customers upon rebasing. It would be inefficient (and unfair to the potential standby customers) to revisit the basis for the rate again at the time of rebasing.

In considering the above, VECC submits the Board should accept VECC as an intervenor in this proceeding.

Yours truly,

A handwritten signature in black ink, appearing to read 'Cynthia Khoo', is written in a cursive style.

Cynthia Khoo
Counsel for VECC

Cc: Milton Hydro Distribution Inc.