

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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July 9, 2008

VIA MAIL & E-MAIL

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

Dear Ms. Walli:

Re: Hydro One Networks I(HON)

2009 Uniform Transmission Rate Adjustment

Comments of the Vulnerable Energy Consumers Coalition (VECC)

Board File No EB-2008-0113

VECC has reviewed Hydro One Networks' May 20th, 2008 Application regarding the above matter and does not take issue with the calculations provided by HON regarding the proposed 2009 Uniform Transmission Rates and the revenue shares for the four Ontario transmitters.

VECC notes that part of the rationale for the uniform transmission rate adjustment is the expectation that continued use of the existing uniform transmission rates would result in an over-payment to customers of the \$56.7 M of Earnings Sharing resulting from the 2006 excess earnings. In VECC's view the Board should require HON to report (early in 2009) regarding the actual amount repaid to customers as of December 31, 2008 as part of the company's application for 2009/2010 rates.

We apologize for filing these comments late; it was entirely inadvertent on our part.

Yours truly.

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Michael Buonaguro Counsel for VECC