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ONTARIO ENERGY BOARD
Niagara-on-the-Lake Hydro Inc.

October 30, 2008

13/11/08

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

EB-2008-0237

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OEB BOARD SECRETARY	
File No:	Sub File: <i>19</i>
Panel	<i>CS ON</i>
Licensing	<i>DB</i>
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VIA E-MAIL and Mail

**Re: AMPCO Late Request for Intervenor Status
Niagara-on-the-Lake Hydro Inc. Application for 2009 Electricity
Distribution Rates - Board File No EB-2007-0755**

Dear Ms. Walli,

We are in receipt of the Board's October 27th letter to AMPCO requesting clarification of its intervention motives. In our opinion, AMPCO's response of October 29 fails to demonstrate how our application would affect the interests of AMPCO's membership.

We understand the Board's role to ensure just and reasonable rates and we do not wish to deny any consumer within our community the opportunity to oppose or question any part of a rate application. However, we fail to comprehend how Ford Motor Company or Imperial Oil would be even remotely affected by our application. How will knowledge of change in NOTL Hydro operating costs affect Suncor or Arcelor-Defasco? As previously mentioned, NOTL Hydro does not have any large customers and our customers would be incensed to hear that they will ultimately absorb AMPCO's expected costs of \$5000 to \$10,000 for the purpose of allowing AMPCO to "...remain a consistent participant in Board proceedings related to utility regulation." AMPCO has over 40 very large customers across Ontario and has plenty of opportunity to intervene in those particular applications.

AMPCO's response focuses concern on the accuracy of distributors' Cost Allocation data. NOTL Hydro gathered and assembled our CAR data in 2006 based on best efforts and Board guidance. It is the Board's mandate to set just and reasonable rates and we are confident that the Board will thoroughly review and approve or adjust our CAR-related results in the best interest of NOTL customers.

Our community is experiencing difficult economic times with the recent closing of the Cangro fruit processing plant and the downturn in tourism. The NOTL Hydro application currently has 3 approved intervenors in addition to the Board. Saddling our small (7800) customer base with unwarranted intervenor costs is not in the best interest of this community. AMPCO suggests that we view their request as 'hostile' to our interests when in fact we believe the impending cost/benefit results will be hostile to our customers.

We trust that the Board will also agree with our position and deny this intervention in the best interest of NOTL Hydro customers.

Regards,

A handwritten signature in cursive script, appearing to read "J. Huntingdon".

Jim Huntingdon
President