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October 8, 2008

Ms. K. Walli
Board Secretary
Ontario Energy Board
26th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Innisfil Hydro Distribution Systems Limited
Board File EB-2008-0233

Innisfil Hydro Distribution Systems Limited (IHDSL) has received notice a late request has been filed to the Ontario Energy Board from the advocacy group AMPCO to register as an intervenor in our 2009 rate application.

We are requesting the intervenor request be denied on the following grounds:

1. IHDSL contends AMPCO does not have local representation in our service territory so therefore is not a stakeholder with regard to the public interest.
2. IHDSL does not have a large user customer class (over 5 MW). An estimated cost award of \$10k is equal to 27 months of fixed distribution costs for a GS>50 customer and will therefore be cross subsidized by the all of the other customer classes.
3. The request was filed late and therefore does not qualify.
4. Four intervenors will be registered to review IHDSL's 2009 rate application if AMPCO's special request is approved. Including the OEB staff, there would be five groups reviewing IHDSL's rate application for which IHDSL customers will be required to pay for. We believe this will result in unwarranted duplication and unnecessary costs to our small customer base and therefore not in the public interest.

If you require anything further please contact the undersigned at your earliest convenience.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Laurie Ann Coolidge".

Laurie Ann Coolidge, CMA, CPA
CFO/Treasurer