



PUBLIC INTEREST ADVOCACY CENTRE
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November 19, 2008

VIA MAIL and 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: Vulnerable Energy Consumers Coalition (VECC)
EB-2008-0219
EGD 2009 Rates

Please find enclosed the comments of the Vulnerable Energy Consumers Coalition (VECC) on the proposed Issues List in the above-noted proceeding.

VECC has no significant concern with the Draft Issues List Attached to Procedural Order #1. However the interpretation of the scope of some issues has been placed into doubt by the letter of November 19, 2008 from Counsel to Enbridge.

It appears that Enbridge is seeking to narrow the scope of some issues, which as worded in the Procedural Order were sufficiently broad to cover intervenor concerns about the extent and depth of the Company's evidence for Phase 1.

We continue to reject the notion that Phase 1 is purely mechanical. As noted in our earlier letter on procedural matters, we believe that the detailed examination of the forecasts which determine how the formula-based Revenue Requirement per Customer is allocated to customers is a consequence of the IRM formulation that governs EGD's rates.

The Board should reject EGD's proposal, or in the alternative hold an Issues Conference at which these matters can be discussed and hopefully settled.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC