

Wellington North Power Inc.

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July 30, 2012

Ontario Energy Board
Attention: Kirsten Walli, Board Secretary
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Request to Transfer to Tranche 6 for IRM filing.
Case Number: EB-2012-0174.

Wellington North Power Inc. is in receipt of the Board's e-mail to all Licensed Distributors, dated July 26, entitled: "**Process for 2013 Incentive Rate Mechanism ("IRM") Distribution Rate Applications.**" In Table 1 of this letter, it identifies that Wellington North Power Inc. is included in Tranche 1 with a Filing Date of 31-Aug-12.

This letter is a request to the OEB asking that Wellington North Power Inc. is either:

1. Treated similar to those LDCs mentioned in Footnote 1 of Table 1 of the OEB's letter dated July 26, 2012 as Wellington North Power Inc. is also part-way through its 2012 Cost of Service proceeding with 2012 rates yet to be approved by the OEB;
2. Or, the LDC's 2012 IRM filing date is amended to 09-Nov-12 and to be included in Tranche 6.

Wellington North Power Inc. is putting forward these options to the OEB based upon the following factors:

- Wellington North Power Inc. is mid-way through its 2012 Cost of Service rate application (case EB-2011-0249). Currently, the LDC is responding to Supplemental Interrogatories which are due to be filed with the OEB on August 8, 2012. Furthermore, there is a scheduled Settlement Conference on August 22, 2012, with any Settlement Proposals to be filed by September 7, 2012.

At this time, the LDC is of the opinion that it cannot complete and submit an IRM filing by August 31, 2012 as well as undertake the necessary work required in preparing for the Settlement Conference and any resulting Settlement Proposals.


- Wellington North Power Inc. submitted its IRM Survey to the OEB on July 6, 2012. In this submission, the LDC checked all requests as "No" with the exception of Incremental Capital Claim which was selected as "Maybe". The LDC has assumed that given its IRM requests to be minimal, it would be included in a later tranche file date.
- Given that the 2012 rates for Wellington North Power Inc. have yet to be approved by the OEB, the LDC is unclear how any rate adjustments calculated through the IRM framework can be applied.
- Wellington North Power Inc. notes that Footnote #1 of Table 1 of the OEB's letter, dated July 26, 2012, lists LDCs that are currently involved in 2012 Cost of Service proceedings and "*the Board noted that Delivery charges based upon the IRM framework may be adjusted as part of these applications.*" Given that Wellington North Power Inc. is also an LDC that is involved in 2012 Cost of Service proceedings, could the same approach be applied to WNP?

As mentioned previously, Wellington North Power Inc. believes that it will be unable to achieve the IRM filing due date of August 31, 2012 given the commitments required to fulfill its 2012 Cost of Service proceeding; therefore, the LDC is requesting to the OEB to consider the options proposed, namely:

1. To be treated similar to other LDCs who are part-way through their 2012 Cost of Service proceeding;
2. Or, transfer WNP's IRM application to Tranche 6 with a filing due date of November 9, 2012.

If the Board has questions regarding this matter please contact Richard Bucknall at rbucknall@wellingtonnorthpower.com or myself at jrosebrugh@wellingtonnorthpower.com or call 519-323-1710.

Yours truly,



Judy Rosebrugh
Judy Rosebrugh President & CEO

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