



Direct Dial: 416.862.4825
File: 6427

Sent by Electronic Mail and RESS Filing

August 1, 2014

Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Low-Income Energy Network Supplementary Comments
Board File No. EB-2012-0410 - Rate Design for Electricity Distributors**

Enclosed please find LIEN's supplementary comments on rate design for electricity distributors.

LIEN makes this supplementary submission to clarify LIEN's position, having reviewed the submissions of others and spoken with other intervenors.

Yours truly,

Matt Gardner

Encl.

Document #: 752128



Low-Income Energy Network

LIEN has now read the submissions of other parties, in particular the submissions of GEC, BOMA and the Ontario Clean Air Alliance.

The Board asked only for the parties' feedback on the three options to implement fixed rates, so LIEN endeavoured to be helpful to the Board in that limited regard. Since LIEN has now had a chance to review the submissions of others and spoken with other intervenors, we feel it is important to clarify LIEN's position. **LIEN does not support a fixed rates approach as the preferred way to address decoupling** and supports GEC and OCAA's position that fixed rates should not be used for decoupling.

LIEN re-emphasizes that LIEN does not outright endorse the Board's option 1, but not having the necessary information to be able to evaluate options 2 and 3, option 1 is most preferable, subject to finding out more information that may lead LIEN to support either option 2 or option 3 (more likely).

Again, LIEN recommends that the Board provide: **(1) information regarding the percentage of utility distribution costs that are fixed, if they are, typically by utility, less than 100% of the total distribution costs; and (2) an explanation why such information was not considered significant from a ratemaking point of view.**

LIEN's position is that the Board needs to obtain and provide the parties with the information above before the parties, and in particular LIEN, are able to definitively endorse any of the options.

LIEN submits that the Board should also consider investigating LIEN's modified option 3 (as set out in LIEN's submission), which is similar to one of GEC's recommendations.

Document #: 750830

c/o Advocacy Centre for Tenants Ontario (ACTO)
425 Adelaide St. West, 5th floor, Toronto, ON M5V 3C1
Phone: 416-597-5855 ext. 5167 1-866-245-4182 Fax: 416-597-5821

LIEN is a project funded by the Ontario Trillium Foundation and supported by ACTO and Legal Aid Ontario