



Electronic Meter Shop

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2006-07-17

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

Attn: Mr. John Zych, Board Secretary

Dear Mr. Zych:

**Re: Cost Allocation Review: Staff Proposal on
Principles and Methodologies – EB-2005-0317**

Please see the following comments relating to the above noted Board Staff Proposal.

Section 7.4.2.4 – Proposal – Density Thresholds and Measurements for Cost Allocation Filings

For the purposes of applying the generic minimum system results a density calculation is proposed. The Staff proposal paper suggests the number of customers per kilometre as a dividing line between low, medium and high density. Clarification on the calculation of density is required. At the most recent Cost Allocation Workshop, density was described in the handouts as kilometres per customer rather than customers per kilometre as stated in the Staff proposal paper.

Section 8.6.3 – Filing Questions

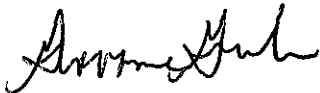
The questions in this section relate to an estimate of line losses. Question 3 requests an estimate of line losses broken out according to 50 kV, bulk, primary and secondary assets. A common methodology in determining these estimates would assist in calculating these amounts and in obtaining more consistent estimates.

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Thank you for the opportunity to comment, please do not hesitate to contact me if you require further information on the above comments.

Sincerely,

ENWIN Powerlines Ltd.



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