



March 21, 2007

By Email

Kirsten Walli
Ontario Energy Board
PO Box 2319, 27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2006-0330 - Multi-year Electricity Distribution Rate Setting Plan
Selection of Electricity Distribution for Rebasing**

Middlesex Power Distribution Corporation (MPDC) is providing this submission to the Ontario Energy Board (Board) to self-nominate as to which year MPDC would request to when the rate rebasing would occur.

MPDC is requesting that they rebase in 2010 for the following reasons;

- MPDC does not have any significant liquidity issues.
- MPDC has a reasonable Return on Equity.
- MPDC is in the lower half of operating costs using the recent Board summary.
- MPDC has been named in O. Reg 425/06 which permits MPDC to undertake full deployment of smart meters. As such MPDC is in full deployment of smart meters such that all residential customers will have smart meters by the fall of 2007. The customers will also begin to be charged the time-of-use rates. The new rate structure will most likely change the load profile and it will be necessary to have a few years history in order to provide a reasonable load forecast.

MPDC would like to thank the Board for their consideration in rate rebasing in 2010. If any staff members would like to discuss further I can be reached at the number below.

Yours truly,

Jim Hogan, CGA, MBA
Chief Financial & Regulatory Officer

C. Dave Kenney, President