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January 11, 2007

BY EMAIL & BY COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2006-0330
Rebasing Schedule for Electricity LDCs
Board Staff Discussion Paper – Comments of Energy Probe

Energy Probe Research Foundation (Energy Probe) has reviewed the December 19, 2006 Board staff Discussion Paper in respect of a Screening Methodology to Establish a Rebasing Schedule for Electricity LDCs.

The criteria under consideration for determining each LDC's rebasing year, including the opportunity for an LDC to nominate themselves for a tranche which they feel best suits their circumstances, should serve us all well over the coming three years. A number of intervenors had been concerned that LDCs with relatively high costs would not be rebased until late in the process. The proposal by Board staff that only the first tranche should be selected initially, we feel is an appropriate one.

Although not explicitly stated, it is our understanding that any LDC will be able to bring forward a rates application if they determine that it is required. If we are correct, perhaps for reasons of clarity that might be explicitly stated in the January 19, 2007 release of finalized criteria.

Thank you for permitting Energy Probe to comment on the Board's approach. Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org