NIAGARA ERIE PUBLIC POWER ALLIANCE

January 7, 2005

Ontario Energy Board Attention: Mr. John Zych, Board Secretary PO Box 2319 26th Floor, 2300 Yonge Street Toronto, Ontario M4P 1E4

Re 2006 Electricity Distribution Rates (2006 EDR) – RP-2004-0188

Dear Sir,

The Niagara Erie Public Power Alliance (NEPPA) is a cooperative arrangement of eleven Local Distribution Companies.

NEPPA has jointly reviewed the Draft 2006 Electricity Distribution Rate Handbook. At this time, the following NEPPA members Grimsby Power, Haldimand County Hydro, Niagara Falls Hydro, Niagara-on-the-Lake Hydro, Norfolk Power, Peninsula West Power and Welland Hydro respectfully submits its comments (as attached) for Charters 7, 10 and 14 as arguments against decisions that have been made by others to the OEB.

NEPPA is appreciative of the Board's process to form workgroups and involve all stakeholders in the development of the 2006 Rates. We are confident that a well-constructed and fair rate structure will evolve as a result.

Should you require further information or explanation on any of our comments, please contact Jim Huntingdon, (905) 468-1285 x 55, or Brian Weber, 905 945-5437 x 221.

Yours truly,

John A. Alton Peninsula West Utilities Limited, NEPPA Chair

cc: NEPPA

Attachment