Dear Ms. Walli:

Renewed Regulatory Framework (RRFE)
EB-2010-0377 / 0378 / 0379, EB-2011-0043, EB-2011-0004
Electrical Contractors Association of Ontario (ECAO)

As counsel to ECAO in this matter, we write pursuant to the Board's letter of October 18, 2012 to request that ECAO be determined eligible for recovery of its reasonably incurred costs of participation in the consultation activities relating to the RRFE. ECAO seeks cost eligibility pursuant to Rules 3.03(b) and/or 3.04 of the Board's Practice Direction on Cost Awards, as a party representing a public interest relevant to the Board's mandate.

ECAO is a not-for-profit corporation established to represent electrical contractors across Ontario. ECAO's 850 member contractors provide a broad range of electrical services in the institutional, commercial, industrial, residential and electrical utility construction and maintenance marketplace. The services provided include: planning, siting, construction and maintenance of power lines, poles and transformers; construction and maintenance of substations; construction and maintenance of power generation equipment and facilities (powerhouses and all related inside and interconnection wiring); and construction and maintenance of interconnection facilities.

ECAO has a direct interest in the regulation of electrical transmission, distribution and related interconnection facilities. ECAO's members have done extensive work constructing connection facilities for Ontario's privately developed electricity generation facilities, and its members and their customers are directly affected by and interested in the regulation of network investment plans by transmitters and distributors. Further, ECAO has a unique ability to contribute to the Board's coordinated consultative process by drawing on the extensive industry experience of its members. ECAO welcomes the opportunity to provide the Board with its perspective on public interest issues such as economic efficiency of electricity transmission and distribution delivery, and the cost-effectiveness of network investment planning, including issues such as: evaluation of capital construction input costs; contracting out, competitive procurement, the importance of competitive markets and the definition of network assets; in-house performance of capital construction; and evaluation mechanisms, including benchmarking models.
Communications

Please direct all communications relating to EB-2010-0377 and EB-2010-0379 to:

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Yours truly,

[Signature]
Robert Frank
RIF/ss