

AIRD BERLIS

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July 13, 2018

VIA COURIER, EMAIL AND RESS

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

Dear Ms. Walli:

**Re: Application for electricity distribution rates
EB-2017-0038**

We are counsel to Erie Thames Powerlines Corporation (“**ETPL**”), in the above noted proceeding.

We have received intervention requests from the Schools Energy Coalition (“**SEC**”), the Vulnerable Energy Consumers Coalition (“**VECC**”) and late requests from the Consumers Council of Canada (“**CCC**”) and Toyota Motor Manufacturing Canada Inc. (“**TMMC**”). ETPL does not object to the participation of any of the requested intervenors based upon their stated areas of interest and participation.

We understand that VECC and CCC primarily represent the same constituency, the interests of residential customers, and ETPL would request that they coordinate their participation to ensure there is no duplication of efforts. We understand, for experienced intervenors like VECC and CCC, this is the usual course but wanted to ensure the comment was made on the record. ETPL does not object to the eligibility for a costs awards of either party but reserve the right to make submissions regarding recovery of costs at the conclusion of the proceeding.

ETPL notes this Application was selected by the Board for piloting a new process to try to gain efficiencies in the regulatory process that would result in savings for customers. To date, the process has taken almost 10 months since the initial submission to the Board and the original implementation date of May 1, 2018 has long passed. ETPL notes that the expanded duration of the proceeding to date and the participation of two additional intervenors who have not previously participated in ETPL applications were not included in the forecast of regulatory costs included in this Application.

We note that CCC’s letter seeking intervenor status referenced the typical steps in a traditional rate application. As such, ETPL is concerned about the potential unforecasted costs that it could incur should the proceeding continue along the same path that it has to date. As a pilot process, ETPL understand there may be broader, important process issues of interest to SEC, VECC and CCC but ETPL’s shareholders should not bear the risk of additional costs associated

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with such issues. We would request Board Staff and parties work cooperatively to ensure the most timely and cost efficient completion of this proceeding.

If there are any questions or comments please contact the undersigned.

Yours truly,

AIRD & BERLIS LLP



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