

September 18, 2007

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

Dear Ms. Walli:

**Re: EB-2007-0606 & 0615 – GEC comments on CCC motion**

Pursuant to Procedural Order No. 7 GEC offers the following comments on the matters arising in CCC's motion.

GEC agrees that in lengthy cases the absence of a funding or interim costs regime can create an undue burden and in some cases can cripple an intervention. In particular, GEC anticipates that the forthcoming IPSP hearing will be an example where interim costs will be vital if the Board wishes to enable meaningful and helpful interventions. Accordingly, GEC is generally supportive of the CCC request for an interim costs regime (and for an update to the costs tariff should the Board re-open that consideration).

We would note however, that in the current case the extent of GEC's participation is still uncertain and it may prove unnecessary and needlessly cumbersome for GEC to utilize a two phase costs submission process. Accordingly, we suggest that participation in any interim process be voluntary (i.e. without prejudice to a non-participant's ability to seek full costs in the final cost award process).

Finally, should the Board decline to grant CCC the relief it requests in this case we ask the Panel to take care not to preclude a fresh look at this question in the context of the IPSP proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch