



**PUBLIC INTEREST ADVOCACY CENTRE**  
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VIA COURIER AND EMAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
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Dear Ms. Walli:

**Re: Union Gas / Enbridge Gas Distribution Inc. - Incentive Rate Regulation for  
Natural Gas Utilities B-2007-0606 / EB-2007-0615  
CCC Motion re Interim Funding**

We have had the opportunity of reviewing the comments of IGUA and LPMA/BOMA/WGSP with respect to the issue of interim cost awards and are in substantial agreement with those comments and the relief requested by CCC. We should note that VECC is a co-sponsor of Mr. Loube's evidence.

VECC is in a similar circumstance to others with respect to previous proceedings; by way of example, VECC has retainers with experts in the most recent EGD rate proceeding that begun approximately one year ago without any recovery. We do note that the cost decision came out yesterday on phase 1 of those costs which should now be paid shortly, but the point should be made that having to make arrangements with experts that may see the intervenor or the expert carry costs for a year or more may impact the ability of intervenors to continue to retain appropriate expert advice.

We expect that the motion was not intended to limit the relief requested to CCC, and in that respect we agree with Mr. Aiken's submissions that the Board consider the motion in relation to all funded intervenors.

Yours truly,

Michael Buonaguro  
Counsel for VECC