



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

Re; Hydro One Networks 2013 Distribution Rate Application
FOCA Request for Late Intervenor Status
Board File EB-2012-0136

October 3, 2012

Dear Ms Walli;

Pursuant to the Board's Procedural Order 2 dated Sept 6, 2012 indicating the Density Study and implementation would be included in this proceeding, FOCA wishes to apply for late intervenor status and an award of any out of pocket expenses for travel, meals and any necessary overnight accommodation. FOCA will not be filing interrogatories as the Sept 25 deadline has passed.

FOCA's Interest

As we have commented to Hydro One in the past, we have a number of chronic concerns about the rates being disproportionately borne by FOCA's membership.

FOCA is a not-for profit educational and advocacy group representing the interests of residential waterfront property owners, who comprise a significant portion of the 150,000 members of Hydro One's "Seasonal Class". FOCA was established in 1963 and has 500 paid member associations having an underlying membership of almost 50,000 families.

In this application FOCA's main interest is the Density Study and its implementation. FOCA favours the 2013 return of the seasonal Revenue/Cost ratio to the 1.03 level previously approved by the Board; all as summarized in Table 6, of Exhibit D Tab 1, Schedule 1. If this is not accepted by the Board, we would favour Table 5 of the above exhibit with a firm schedule to return the Rev/Cost ratio close to unity within two years maximum.

During deliberations with our Board members, issues were identified that are out of the scope of this proceeding but could be considered in a future Cost of Service proceeding; These include making use of Smart Meter data to more accurately allocate costs to classes and the

seasonal class definition. It is our hope that reforms to the rating system (that currently is defined by the type of property ownership, versus energy consumption) will be part of future rating changes.

Our representatives for service in this proceeding are;

John McGee, P.Eng.
36 Grouse Glen, Barrie, ON,
L4N 7Z7
T 705 726 0707
E mail mcgeejs@csolve.net

And

Terry Rees
Executive Director, FOCA
c/o 201-159 King St
Peterborough, ON
K9J 2R8
T 705-749-3622
e-mail rees@foca.on.ca

Sincerely,

A handwritten signature in blue ink, appearing to read "Ted Spence", with a stylized flourish at the end.

Ted Spence, President
FOCA

Copies; Mr Pasquale Catalano regulatory@hydroone.com
Mr D.H. Rogers, Q.C. don.rogers@rogerspartners.com