

October 29, 2012

**Via email and courier**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Suite 2700  
2300 Yong Street  
Toronto ON M4P 1E4

Our reference  
01131041-0016

 **NORTON ROSE**

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On January 1, 2012, Macleod Dixon joined  
Norton Rose OR to create Norton Rose Canada.

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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.

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
October 29, 2012



***Communications***

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

**ELECTRICAL CONTRACTOR ASSOCIATION  
OF ONTARIO**

460, 170 Attwell Drive  
Toronto, ON M9W 5Z5

Attention: Mr. Eryl Roberts  
Executive Vice-President

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Attention: Robert Frank

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Yours truly,

A handwritten signature in black ink, appearing to read "Robert Frank", written over a horizontal line.

Robert Frank

RIF/ss