June 19, 2013

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street P.O. Box 2319 Toronto, Ontario M4P 1E4

Dear Ms. Walli:

Re: Application by Hydro One Networks Inc. for Approval of Distribution Rates for 2014 – EB-2013-0141 – 3rd Generation Incentive Regulation Mechanism

I am a consultant to the Consumers Council of Canada ("Council"). I have been instructed by my client to intervene in the Application by Hydro one Networks Inc. for approval of distribution rates effective January 1, 2014. In addition to the request for a formulaic adjustment to rates under the Board's 3rd Generation IRM, Hydro One is also requesting a Smart Grid Rate Rider to recover \$29.3 million in costs for its Smart Grid Program.

The Council is a public-interest entity which represents the interests of residential consumers of electricity and natural gas in Ontario. The Board's order in this proceeding will ultimately impact the rates which residential consumers pay for the delivery electricity.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many of the Ontario Energy Board's electricity distribution rate applications and policy consultation processes over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all Board Notices and hard copies of the Applicant's evidence should be sent to me, at 62 Hillsdale Avenue East, Toronto, Ontario, M4S 1T5. My telephone number is 416-322-7936 and my email is jgirvan@uniserve.com.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: Joan Huzar, Consumers Council of CanadaMichael Engelberg, Hydro OneJamie Waller, Hydro One Regulatory Affairs