



SHIBLEY RIGHTON <sup>LLP</sup>  
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Please Reply to the TORONTO OFFICE

**BY EMAIL and COURIER**

April 24, 2008  
Our File No. 2070666

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: Smart Meter Motion To Review EB-2007-0747/EB-2007-0748**

We enclose herewith the claim for costs of the School Energy Coalition in the above mentioned matter, including the affidavit in Form 3, the consultant claim Forms 1 for all those who worked on this matter, together with supporting original dockets broken down by type of activity, and the disbursements summary on Form 2 with attached receipts. Copies have been delivered by email to the applicant as well. If any additional information or documentation is required, please call 416-804-2767 or email ([jay.shepherd@shibleyrighton.com](mailto:jay.shepherd@shibleyrighton.com)) the undersigned or speak to Tanya Watson at 416-214-5261.

**Costs Eligibility**

The School Energy Coalition ("Schools") is eligible for a cost award because it "primarily represents the interests of consumers (e.g. ratepayers) in relation to regulated services". School boards are one of the largest groups of non-industrial energy consumers in the province, and their energy costs have a direct impact on the education of millions of Ontario children. The formation of the School Energy Coalition ensured that all representatives of the interests of schools participated jointly in OEB proceedings. Schools has been awarded costs in many cases at the OEB in the past. Schools is not ineligible by reason of any of the criteria contained in section 3.05 of the Practice Direction on Cost Awards.

GREAT LAKES  
LAW



**Conclusion**

Schools therefore respectfully requests that it be awarded 100% of its costs as claimed.

Yours very truly,

**SHIBLEY RIGHTON LLP**

Jay Shepherd

## FORM 3

## AFFIDAVIT IN SUPPORT OF COST CLAIM

EB-2007-0747/2007-0748 <hr/> <b>Board File Number</b>	School Energy Coalition <hr/> <b>Party Name</b>
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**Items Claimed excluding GST**

Legal/Consultant Fees	+	Disbursements	=	Net Sub-Total
\$ 1,267.50		\$ 3.25		\$ 1,270.75

  

**Goods and Services Tax**

..... Full Registrant ..... Unregistered (GST at 7%) ..... Other _____ GST at _____ %	..... Qualifying Non-Profit ( GST at 3.5%) ..... Tax Exempt (no GST)
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**Total Cost Claim**

Net Sub-Total	+	Total GST Claimed	=	Total Cost Claim
\$ 1,270.75		\$ 0		\$ 1,270.75

  

I, (name) John De Vellis, of the (City, Town, etc.) Toronto in the  
 (County, Regional Municipality, etc.) of \_\_\_\_\_, **MAKE OATH AND SAY:**

7. I am a representative of the above noted party ( the "party") and as such have knowledge of the matters attested to herein.

8. I have examined the above Cost Claim and all of the documentation in support of it.

9. The above Cost Claim represents only costs incurred directly and necessarily by the Party for the purpose of its intervention in the Ontario Energy Board proceeding the file number which is set out above.

  

**SWORN (OR AFFIRMED) BEFORE ME** at the (City, Town, etc.) of  
Toronto, in the (County, Regional Municipality, etc.) of  
 \_\_\_\_\_ on (date) April 24, 2008

  

_____ <b>COMMISSIONER for taking Affidavits</b>	_____ <b>Signature of Deponent</b>
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(February 12, 2003)

**FORM 2****SUMMARY OF DISBURSEMENTS**

EB-2007-0747/2007-0748	School Energy Coalition
Board File Number	Party Name
Shibley Righton LLP	
Party or Group that made the disbursement	

  

	Net Cost	GST	
Photocopies	\$3.75	N/A	
Printing	\$0.00	N/A	
Fax	\$0.00	N/A	
Courier	\$0.00	N/A	
Telephone	\$0.00	N/A	
Postage	\$0.00	N/A	
Transcripts			
Travel: Air			
Travel: Car	\$0.00	N/A	
Travel: Rail			
Travel: Other ( )	\$0.00		
Taxi or Airport Limo			
Accommodation			
Meals			
Other ( )	\$0.00	N/A	
<b>Sub-totals</b>	\$3.75	N/A	\$3.75

**Notes** 1. All claims for disbursements must include receipts where practicable.  
2. All claims must be in Canadian dollars. If applicable state exchange rate \_\_\_\_\_ and country of initial currency \_\_\_\_\_

**FORM 1**

Appendix "B"

**SUMMARY STATEMENT OF HOURS - CONSULTANTS AND LEGAL COUNSEL**

A separate form is required for each consultant or legal counsel

EB-2007-0747/2007-0748 <hr/> <b>Board File Number</b>		School Energy Coalition <hr/> <b>Party Name</b>	
Jay Shepherd (JS) <hr/> <b>Legal Counsel Name</b>	1980 <hr/> <b>Year of Call</b>	Shibley Righton LLP <hr/> <b>Law Firm</b>	
<hr/> <b>Consultant Name</b>	<hr/> <b>Years of Relevant Experience</b> (curriculum vitae must be attached)	<hr/> <b>Consultant Firm</b>	

  

	Hours	Hourly Rate	Sub-total	GST	Total
<b>Preparation</b>	5.5	\$210.00	\$1,155.00	N/A	\$1,155.00
<b>Attendance - Technical Conference</b>	0.0	\$210.00	\$0.00	N/A	\$0.00
<b>Attendance - Settlement Conference</b>	0.0	\$210.00	\$0.00	N/A	\$0.00
<b>Attendance - Oral Hearing</b>	0.3	\$210.00	\$63.00	N/A	63.00
<b>Argument</b>	0.0	\$210.00	\$0.00	N/A	\$0.00
<b>Case Management</b>	0.0	\$210.00	\$0.00	N/A	\$0.00
<b>TOTALS</b>	5.80	\$210.00	\$1,218.00	N/A	\$1,218.00

**Note:** All claims must be in Canadian dollars. If applicable, state exchange rate \_\_\_\_\_, and country of initial currency \_\_\_\_\_.

**FORM 1**

Appendix "B"

**SUMMARY STATEMENT OF HOURS - CONSULTANTS AND LEGAL COUNSEL**

A separate form is required for each consultant or legal counsel

EB-2007-0747/2007-0748 <hr/> Board File Number			School Energy Coalition <hr/> Party Name		
<hr/> Legal Counsel Name		<hr/> Year of Call		<hr/> Law Firm	
Rachel Chen <hr/> Consultant Name		7 <hr/> Years of Relevant Experience (curriculum vitae must be attached)		Institutional Energy Analysis <hr/> Consultant Firm	

  

	Hours	Hourly Rate	Sub-total	GST	Total
<b>Preparation</b>	0.3	\$165.00	\$49.50	N/A	\$49.50
<b>Attendance - Technical Conference</b>	0.0	\$165.00	\$0.00	N/A	\$0.00
<b>Attendance - Settlement Conference</b>	0.0	\$165.00	\$0.00	N/A	\$0.00
<b>Attendance - Oral Hearing</b>	0.0	\$165.00	\$0.00	N/A	\$0.00
<b>Argument</b>	0.0	\$165.00	\$0.00	N/A	\$0.00
<b>Case Management</b>	0.0	\$165.00	\$0.00	N/A	\$0.00
<b>TOTALS</b>	0.30	\$165.00	\$49.50	N/A	\$49.50

**Note:** All claims must be in Canadian dollars. If applicable, state exchange rate \_\_\_\_\_, and country of initial currency \_\_\_\_\_.

**SMART METERS MOTION TO REVIEW  
EB-2007-0747/2007-0748**

DATE	DESCRIPTION	LYR.	PREP.	TECHNICAL	ARGUMENT	SETTLEMENT	ORAL	TIME
28-AUG-2007	Review filed material;	JS	0.4					0.4
13-SEP-2007	Review utility info;	JS	0.8					0.8
14-SEP-2007	Review Rachel's analysis;	JS	0.7					0.7
17-SEP-2007	Review evidence; review VECC Factum; meeting with Rachel Chen; various emails;	JS	1.3					1.3
18-SEP-2007	Prep; attend at hearing (2.3); review decision; various emails;	JS	2.0				2.3	4.3
21-SEP-2007	Review decision	JS	0.3					0.3

**Smart Meters Motion To Review**  
**EB-2007-0747/2007-0748**  
**BILLABLE TIME BY Rachel Chen**  
**INSTITUTIONAL ENERGY ANALYSIS INC.**

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DATE	DESCRIPTION	Prep.	Tech.	Arg.	Settle.	Oral	Total
24-SEP-2007	EB-2007-0747/0748 Smart Meter Proceeding - Toronto Hydro & Hydro Ottawa Motions to Review - reviewed Tr, Decision.						0.3



# **RACHEL MU CHEN, B.Sc., MBA**

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## **EDUCATION**

**Master of Business Administration**, Schulich School of Business, York University, Canada, April 2000

- Specialization: Major in Finance, Minor in Financial Services and International Business
- “A-” Average in core courses
- GMAT Score – 97<sup>th</sup> Percentile

**Bachelor of Science**, (Honours) Biochemistry, Fudan University, Shanghai, P. R. China, 1996

- 2<sup>nd</sup> Class Outstanding Student Scholarship, 1995
- Shuping Memorial Scholarship, 1992-1994
- University Entrance Scholarship, 1992

## **EXPERIENCE**

### **Institutional Energy Analysis Inc., December 2006 - date**

**Financial Analyst and Consultant – Institutional Energy Analysis inc.**, December 2006 - date

- Review and modelling of energy rate case issues in both natural gas and electricity, including financial analysis of proposed spending initiatives, modelling of rate implications, comparison of past and proposed rate structures and bill impacts, accounting issues associated with revenue requirements and rates, cost of capital, ROE, and other finance-related analysis and modelling, and other aspects of rate applications.

### **Bell Canada, May 2000 to December 2005**

**Senior Analyst - Economic Studies, Business Decision Support, Bell Canada**, June 2004-December 2005

- Effectively modelled and validated business case and project evaluation studies using the Incremental Value Assessment Process to determine their potential impact on shareholder value and the economic viability of proposed business opportunities in the areas of new technology, new product and service investment, pricing and promotions, deals and contracts, and other business investment initiatives for Bell Canada and BCE affiliate companies.
- Developed and rationalized cost and benefit cash flows utilizing managerial economic methodology, created and managed various models and reports relating to the economic measurement of potential projects, and analyzed the results of economic models to determine their reasonableness based on economic indicators (Net Present Value, Profitability Index, Discounted Pay Back Period, etc).
- Provided evaluation of cost reduction initiatives and re-engineering process strategies for Bell System and Technology.
- Provided complete cost and benefit analysis to all business segment Marketing groups, in their assessment and development of NPI (New Product Initiatives).
- Provided costing analysis in support of regulated products and services to CRTC in alignment with regulatory rules and practices.

- Led discussions on methodology, data sources and inputs by subject matter experts. Provided clients with appropriate advice, direction and insight into economic indicators, costing methodology, cost development, regulatory impact, and capital project approval process.
- Reviewed and critiqued economic business cases performed in other departments within Bell and its subsidiaries in analyzing the economic impact of a variety of business investment opportunities.
- Evaluated the risk level of the overall business investment initiatives, provided unbiased recommendation to support decisions, and actively participated in the capital project evaluation, approval and benefit tracking process.
- Projects completed: EVDO Phase 1 & 2, SOLO Mobile, IP VPN Phase 1, IP VPN Phase 2 - BMO SLA, Sympatico Visual Home Monitoring, Sympatico xDSL Expansion Phase 1 & 2, Nortel 1Meg Modem Exchange, Bell Consumer Call Center Payroll Integrity, Bell Consumer Call Center Operations Performance, Bottle Cap, GM OnStar, City of Mississauga “ Smart Vehicle” Wireless,

**Financial Operations Manager, Management Reporting and Performance Management, Bell Canada, May 2000- May 2004**

- Produced Bell Canada Holding (BCH) management reporting results package (i.e. Executive Summary) and total company external reporting packages to BCE, SBC, and Investor Relations.
- Performed monthly and year-to-date revenue and expense analysis for the above-mentioned packages.
- Accountable for Bell Canada subsidiary reporting. Prepared and reviewed month end subsidiary reports as per BCH deadlines, co-ordinated monthly subsidiary results calls, and completed in-depth financial and variance analysis as well as overall financial performance assessment.
- Key player to prepare and complete other special production requests and reports to meet users’ changing requirements and to support objectives and decision-making.
- Assisted with investigation, reporting and resolution of underlying business issues.

**PriceWaterhouseCoopers, August 1996 to July 1998**

**Auditor, Audit and Assurance Services, PricewaterhouseCoopers, Shanghai, August 1996 - July 1998**

- Performed statutory audit, special audit, and due diligence services.
- Provided professional and value-added advice to clients by assessing their financial statements, accounting procedures and treatments, internal controls, and the overall operation systems. Analyzed the effects of changes in current operations to achieve longer-term business objectives and best practices.
- Possessed the ability to challenge assumptions, overcome objections and influence behaviour in a positive manner.
- Developed and maintained close contact with clients and comfortably dealt with all levels of clients’ management. Client portfolio: Eastman Kodak, Det Norske Veritas, Ryoden Group, China Telecom, Toyota, Fuji Bank, Esprit, etc.
- Managed and maintained good working relationships with banks, municipal tax authorities and other institutions.
- Performed research in labor law regulations pertaining to joint ventures, and assisted senior management in their decision making process.