

April 11, 2014

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

Dear Ms. Walli:

**Re: EB-2012-0410 – Rate Design for Electricity Distributors – Revenue Decoupling**

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to indicate its interest in participating in the Ontario Energy Board’s (“Board”) Consultation Process, entitled “Rate Design for Electricity Distributors”. The Council is a public-interest entity representing the interests of residential consumers in Ontario. The Council has been an active intervenor at the Board for many years, participating in a broad range of proceedings, consultation processes and working groups. The outcome of this consultation process will ultimately impact the rates paid by residential consumers. Moving to a fixed distribution rate represents a significant departure from the Board’s current rate design policies and the Council has an interest in assessing the implications of this change for residential consumers.

The Council is aware of the Board’s enhanced focus on customer engagement and its desire to, as expressed in its Report, “Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach” respond to customer preferences regarding distribution rates and services. Accordingly, the Council would be interested in meeting with the Board to discuss options to facilitate customer engagement regarding its intention to implement fixed distribution rates. The Council is of the view that the Board’s consultation process could be enhanced by gathering information either through surveys or focus groups regarding customer perspectives on rate design.

The Council intends to ask for an order of costs in this proceeding. The Council has been recognized by the Board as being eligible for an award of costs in all of the Board proceedings and other processes it has participated in. The Council would be unable to participate in this process without funding.

My contact information is 62 Hillside Avenue East, Toronto, ON, M4S 1T5. My e-mail address is [jgirvan@uniserve.com](mailto:jgirvan@uniserve.com). In addition, please forward any correspondence to the Council’s Executive Director, Mr. Ken Whitehurst, Consumers Council of Canada, 201-1920 Yonge Street, Toronto, ON, M4S 3E2. His e-mail address is [whitehurst@consumerscouncil.com](mailto:whitehurst@consumerscouncil.com).

Yours truly,

*Julie E. Girvan*

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CC: Ken Whitehurst, Consumers Council of Canada  
Interested Parties