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Our File No. 131801

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

**Re: Draft Report of the Board on Rate Design for Electricity Distributors (the "Report")
Request for Costs; Board File No. EB-2012-0410**

The Building Owners and Managers Association - Greater Toronto (BOMA) respectfully requests eligibility for costs for this consultation. BOMA apologizes for the late submission of this request, but both our counsel and senior advisor were away at the time the Report was issued. Counsel only returned on April 22, 2014.

BOMA's members have many facilities which pay the small commercial rates. In addition, the finding from the small commercial customers may have implications for any subsequent consultation on the medium and large volume customer rates.

BOMA is keenly interested in the Report's rate design proposals which represent a substantial departure from the rates for small commercial customers. The objectives of the exercise, as stated by the Board, in particular the ones of providing stability and predictability of rates to consumers and conservation impacts are of great interest to BOMA.

As the Board knows, BOMA's membership has been a leader in the development of energy efficiency policies and projects and is very interested in distributed generation. It has a special interest in assessing the impact of the proposed alternatives on conservation initiatives and distributed generation, both of which have been highlighted in the Long Term Energy Plan.

BOMA would be represented by Marion Fraser and Tom Brett in the consultation.

Thank you for your consideration.

Yours sincerely,

FOGLER, RUBINOFF LLP



Thomas Brett

TB/dd

cc: Marion Fraser (*via email*)
Chris Conway (*via email*)