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April 24, 2014

Reply To: **Thomas Brett** Direct Dial: 416.941.8861 E-mail: tbrett@foglers.com Our File No. 143035

## VIA RESS, EMAIL AND COURIER

Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, Ontario M4P 1E4

Attention: Kirsten Walli,

**Board Secretary** 

Dear Ms. Walli:

Re: Review of the Board's Policies and Processes to Facilitate Electricity Distributor

Efficiency: Service Area Amendments and Rate-Making Associated with

**Distributor Consolidation** 

Request for Costs; Board File No. EB-2014-0138

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 are among the major users of energy in the province; and the largest in the commercial sector. As a representative of consumer interests, it is normally eligible for an award of costs.

As a customer of electricity distribution services, BOMA has an interest in the structure of the distribution industry that leads to the most cost effective distribution services practicable; both merger and SAA activities can be means of achieving that goal. Accordingly, BOMA has an interest in the various proposals to ensure that maximum economic leverage is obtained from both these activities.



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)