



PUBLIC INTEREST ADVOCACY CENTRE
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May 1, 2014

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)
Request for change to Hearing Schedule
Fort Frances Power Corporation (FFPC) EB-2013-0130**

Procedural Order No. 1 in the above noted proceeding contemplates interrogatories, followed by a settlement conference to be held in Toronto. VECC has concerns with this process. The proceeding does not allow for the clarification of interrogatory responses. It also requires both the Applicant and counsel for VECC travel to Toronto to meet, share information and (potentially) negotiate a resolution to the Application.

We are asking the Board to modify this process. VECC would like the ability to clarify the interrogatory responses (either by way of tele-conference or in writing). We also believe that replacing the settlement conference with written submissions (argument) would be just as effective a process, but at a much lower cost.

In our experience going to either a settlement conference or submissions without an opportunity to have clarified the record makes for inefficient use of all parties' time. Questions raised at this point of the process may take significant time for the Applicant to respond to, or, if left unanswered, make for an inadequate hearing record. Likewise, where there is only one party to a proceeding, as in this case, a settlement conference often distills to the submission of that party. While such conferences can still be useful, in this case, given the size of the utility and distance to be travelled, our view is that written submissions would be just as efficient. In fact, in our view parties in related cost

of service proceedings can benefit and gain insight from the periodic written decisions of the Board

VECC, by the very nature of its interest, is sensitive to the disproportionate regulatory cost borne by small utilities. We believe the above modifications would minimize these costs without compromising the proceeding. We have also discussed our concerns and proposal with the Applicant.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written in a cursive style.

Michael Janigan
Counsel for VECC

cc: Fort Frances - Lori Cain, Finance & Regulatory Officer - ffpc@fort-frances.com