February 24, 2015

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

Dear Ms. Walli:

Re: EB-2015-0006 - OEB Consultation on Proposed Amendments to the Distribution System Code - Facilitating the Elimination of Load Transfers - Request for Costs

On February 20, 2015, the Ontario Energy Board ("Board") issued a Notice indicating its intent to amend the Distribution System Code ("DSC") under section 70.2 of the *Ontario Energy Board Act, 1998*. The purpose of the proposed revisions to the DSC is to facilitate the elimination of the remaining load transfer arrangements between electricity distributors.

The Consumers Council of Canada ("Council") intends to participate in this consultation process. The Council is an organization which represents the interests of residential consumers in Ontario. The outcome of this process will have a direct impact on residential consumers. Specifically, the Council would like to provide written comments regarding the proposed amendments to the DSC, as requested by the Board.

The Council intends to ask for an order of costs in this proceeding. The Council is of the view that it is eligible for a cost award as it primarily represents the direct interests of consumers in relation to the services that are regulated by the Board. On June 23, 2014, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board's Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings and consultation processes. The undersigned intends to represent the Council in this review.

For over a decade the Council has regularly participated in Board proceedings and consultation processes. In those processes the Board has determined the Council to be eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this consultation process.

Copies of all correspondence should be sent to me at <u>jgirvan@uniserve.com</u> and to Ruth Greey at <u>rgreey@gmail.com</u>.

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

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CC: Ken Whitehurst, Consumers Council of Canada

**Ruth Greey**