

March 3, 2015

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

Dear Ms. Walli:

Re: EB-2013-0421 – Notice of New Cost Allocation Issue

On January 28, 2015, the Ontario Energy Board (“Board”) issued a Notice indicating its intent to consider whether its regulatory instruments need to be revised in relation to cost allocation. The Board will consider specifically whether revisions to the Transmission System Code and/or the Distribution System Code are required at this time. These issues arose in the context of Hydro One Networks Inc.’s (“HON”) application to construct approximately 13 kilometers of transmission line in the Windsor-Essex area to install optic ground wire on existing and new towers as part of the Essex County Transmission Reinforcement project.

The Consumers Council of Canada (“Council”) is seeking intervenor status in Phase 2 of this proceeding. 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 cost allocation issues to be considered in this proceeding may impact the distribution and transmission rates that residential consumers ultimately pay.

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 proceeding. The Council intends to participate in all stages of the proceeding, which will include an interrogatory process, and may include technical conferences, a settlement conference and a hearing process. The Council submits that until the interrogatories and intervenor evidence have been filed it would be premature to determine whether an oral or written hearing process would be more appropriate.

We are requesting copies of the evidence filed in this proceeding (both electronic and hard copies), and all correspondence be sent to the following:

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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: Hydro One, Regulatory Affairs