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By Email and RESS - signed original to follow by mail

February 1, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: Hydro Ottawa Limited Distribution Rates 2016-2020 (EB-2015-0004) -
SIA Reply to Cost Claim Objection**

Dear Ms. Walli,

On January 26, 2016, Hydro Ottawa Limited ("HOL") filed its objections to intervenor cost claims, including certain costs claimed by the Sustainable Infrastructure Alliance of Ontario (the "SIA"). The SIA respectfully submits that HOL's objection appears to be based on a misunderstanding concerning the cost categorization used by the SIA, rather than an objection to the underlying activities, costs, or overall cost levels themselves.

In filling out the OEB's standard cost claim form, the SIA used its best efforts to categorize its costs based on the stage of the proceeding in which they were incurred. For example, lacking a more appropriate classification, the SIA included post-hearing activities, as well as most activities related to the various motion filings, in the broad category of "other conference". In its submissions, HOL generally objects to these costs on the basis that, to its knowledge, no activities narrowly fitting these categorical descriptions were undertaken by the SIA during this proceeding. The SIA submits that HOL's conclusion is based on a fundamentally flawed assumption, as it narrowly focuses on the category titles (e.g. "other conference"), but fails to consider the details of the underlying activities that the SIA has included under each of these categories. In the SIA's respectful submissions, all of these activities and associated costs are reasonable and appropriate.

Of the 14.75 total hours that HOL is disputing, 7.75 are directly related to monitoring the technical conference and hearing by reviewing transcript records. This activity was clearly detailed and itemized in the SIA's cost summary¹, and for greater transparency, also noted by way of a separate explanatory footnote. In completing its cost claims, the SIA believed it was most appropriate to categorize the time spent on this activity as "attendance", but HOL appears to have mistakenly assumed that this represented actual in-person attendance. Given the SIA did not plan on undertaking cross examination, it believes that relying on transcript reviews for witness testimony was a very efficient and cost effective approach (as attending in person would have necessarily involved a far larger commitment in time and travel disbursements, and by extension, unnecessarily increased costs well above the levels being claimed). The SIA believes that this minimal amount of time spent on transcript review was reasonable in order to remain informed and engaged in the proceeding, and that the costs stemming from these activities are reasonable and justified.

The remaining 7 hours disputed by HOL all relate to numerous other activities undertaken by the SIA during the course of the proceeding, including reviewing and analyzing various motion filings, motion responses, undertaking responses, evidence updates, procedural orders, decisions, and other submissions. As with transcript review, these activities had been categorized to reflect the stage of the proceeding in which they occurred (generally as "preparation"), and were similarly all itemized and detailed in the SIA's cost claim summary. These types of activities may not always result in a direct response from an intervenor, especially if the intervenor does not have any particular concerns with a given issue, or believes an issue to have already been sufficiently addressed by other parties. However, the SIA does not believe it would be reasonable to participate in this proceeding, even in a limited or reduced capacity, without devoting some time to reviewing the evidence updates, motions, orders, and other submissions in order to make a determination as to whether the material in question was of sufficient relevance or concern to warrant a response on its part. The SIA respectfully submits that these types of activities are common to all intervenors in any proceeding (especially one of this length and complexity), and that the relatively limited time it devoted to these activities in this proceeding was reasonable and appropriate.

Fundamentally, the SIA respectfully submits that the activities underpinning its claimed costs are justified, and that the overall level of its cost claims relative to other intervenors² and its own scope of involvement is reasonable. In its submissions, HOL does not appear to dispute the costs of specific activities undertaken by the SIA during this proceeding, but rather questions the broad categories into which they have been aggregated. The SIA respectfully submits that this concern

¹ The summary was part of the SIA's January 14, 2016 Cost Claim submission.

² The SIA's total cost claim is, appropriately, only a small fraction of those of other intervenors, as it reflects the SIA's more limited involvement in this proceeding. The SIA notes, however, that Tables 1 and 3 included in HOL's Objection submission appear to understate the total hours claimed by certain intervenors, resulting in an inaccurate comparison of relative contributions and a potentially misleading conclusion.

is unwarranted, as HOL has made fundamentally mistaken assumptions about the nature of these costs based solely on their broad categorical descriptions. As detailed above, the SIA submits that the underlying activities included within the cost categories questioned by HOL are all reasonable and appropriate.

The SIA again thanks the OEB for the opportunity to participate in this proceeding, and respectfully requests approval of its reasonably incurred costs as originally filed.

Sincerely,

[original signed by]

Dionisio Rivera