

March 7, 2019

VIA RESS AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli;

**Re: APPLICATION BY ALECTRA UTILITIES CORPORATION FOR DISTRIBUTION RATES
EFFECTIVE JANUARY 1, 2019 (EB-2018-0016) – COST CLAIMS**

On June 7, 2018, Alectra Utilities Corporation (“Alectra”) filed an Electricity Distribution Rate (“EDR”) Application with the Ontario Energy Board (“OEB” or the “Board”), for rates effective January 1, 2019. The application also included incremental capital module (“ICM”) requests for two rate zones.

The following parties were granted intervenor status in this proceeding by the Board and all were found to be eligible for cost awards:

- Association of Major Power Consumers of Ontario (“AMPCO”);
- Building Owners and Managers Association (“BOMA”);
- Consumers Council of Canada (“CCC”);
- Energy Probe Research Foundation (“Energy Probe”)
- School Energy Coalition (“SEC”); and
- Vulnerable Energy Consumers Coalition (“VECC”).

On December 20, 2018, the OEB issued a Partial Decision and Order, which addressed the issues not eligible for cost awards. The remaining issues eligible for cost awards were addressed in a further Decision and Order issued on January 31, 2019. Alectra filed a draft rate order on February 7, 2019 that included detailed supporting information showing the calculation of final rates.

On February 21, 2019, the Board issued its Decision and Final Rate Order. The Board ordered eligible intervenors to file their cost claims by February 28, 2019. The Board also ordered Alectra to file any objections to cost claims by March 7, 2019.

Alectra received cost claims from Energy Probe and VECC on February 28, 2019, and from BOMA, SEC, AMPCO and CCC on March 4, 2019. Alectra has reviewed the cost claims it has received, and offers submissions only with respect to the BOMA cost claim.

Alectra Utilities Corporation

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BOMA Cost Claim

BOMA has claimed a total of \$44,757.11 in fees, inclusive of HST, in this proceeding.

Alectra is concerned about the costs claimed in three specific areas, as follows:

1. BOMA has claimed \$17,190.69 under the ADR Settlement Conference category. The next highest claim, belonging to SEC, was for \$8,241.09. BOMA claimed significantly more hours for preparation and for attending the ADR than any other intervenor; 30 hrs. and 15.3 hrs., respectively.
2. BOMA claimed 41.70 hours under the Argument category. This is almost double the number of hours claimed for Argument as the next highest intervenor (AMPCO at 25.75 hours).
3. BOMA claimed \$904.07 for accommodations.

While BOMA's cost claim, in total, is similar, though still higher, than SEC, the drivers of SEC's claim are well understood. That is, SEC spent significant time preparing for the oral hearing. This is understandable since SEC's focus was on the accounting policy changes which were not resolved until the morning of the oral hearing. BOMA spent double the time of SEC in preparing the final argument. This is concerning since the only elements of the application that were eligible for cost awards, by the time the application was at the argument phase, were the five ICM projects.

Alectra submits that a reduction in the number of hours claimed by BOMA should be reduced on an overall basis to the average of that of the other intervenors, which, in this case is approximately \$25,100.

Should you have any questions or require further information, please do not hesitate to contact me.

Yours truly,

Original signed by Indy Butany-DeSouza

Indy J. Butany-DeSouza, MBA
Vice-President, Regulatory Affairs
Alectra Utilities Corporation