



**ENERGY+ INC.**

1500 Bishop Street, P.O. Box 1060, Cambridge, ON N1R 5X6 • Telephone 519-621-3530 • Fax 519-621-7420  
• Telephone 519-442-2215 • Toll Free 1-877-871-2215 •

July 30, 2019

VIA RESS AND COURIER

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

Dear Ms. Walli:

**Re: 2019 Cost of Service Application (EB-2018-0028) – Cost Claims**

On April 30, 2018, Energy+ Inc. (“Energy+”) filed a Cost of Service Application for distribution rates effective January 1, 2019. The following parties were granted intervenor status in this proceeding by the Board:

- Brantford Power Inc. (“BPI”)
- Consumers Council of Canada (“CCC”)
- Hydro One Networks Inc. (“Hydro One”)
- School Energy Coalition (“SEC”)
- Toyota Motor Manufacturing Canada Inc.
- Vulnerable Energy Consumers Coalition (“VECC”)

CCC, SEC, and VECC were found to be eligible for cost awards.

On June 13, 2019, the Board issued its Decision and Order. The Board ordered eligible intervenors to file their cost claims by July 12, 2019. On July 3, 2019, the Board granted an extension to the date for filing costs claims to July 23, 2019 and requested that Energy+ file any objections to the claims costs no later than July 30, 2019.

Energy+ received costs claims from SEC and VECC on July 23, 2019 and from CCC on July 24, 2019.

The following table summarizes the costs claimed by each Intervenor in this proceeding, by the nature of participation throughout the stages of the application process (i.e. attendance, preparation, proposal preparation, and responses).

**Table 1: Intevenor Costs by Nature of Participation**

<b>Intervenor</b>	<b>Fee (Excluding HST)</b>	<b>Total</b>
<b>CCC</b>	<b>\$ 39,427.50</b>	<b>\$ 44,553.08</b>
Attendance	\$ 14,625.00	\$ 16,526.25
Preparation	\$ 22,632.50	\$ 25,574.73
Proposal Preparation	\$ 1,155.00	\$ 1,305.15
Responses	\$ 1,015.00	\$ 1,146.95
<b>SEC</b>	<b>\$ 39,928.00</b>	<b>\$ 45,118.64</b>
Attendance	\$ 14,467.00	\$ 16,347.71
Preparation	\$ 23,023.00	\$ 26,015.99
Proposal Preparation	\$ 851.00	\$ 961.63
Responses	\$ 1,587.00	\$ 1,793.31
<b>VECC</b>	<b>\$ 70,741.65</b>	<b>\$ 73,522.77</b>
Attendance	\$ 12,375.00	\$ 12,862.58
Preparation	\$ 54,207.00	\$ 56,338.02
Proposal Preparation	\$ 3,465.00	\$ 3,601.52
Responses	\$ 660.00	\$ 686.00
Disbursement	\$ 34.65	\$ 34.65
<b>Grand Total</b>	<b>\$ 150,097.15</b>	<b>\$ 163,194.49</b>

Energy+ has reviewed the cost claims it has received, and offers the following submission with respect to the overall cost claim:

- The total claim, excluding HST, is \$150,097.15 and is approximately \$50,000 greater than the estimate for intervenor costs included in the overall application costs (Appendix 2M Regulatory Costs).
- VECC has claimed a total of \$73,522.77, which is approximately \$28,404 higher than the amount claimed by SEC and \$28,970 higher than the amount claimed by CCC.
- In its Procedural Order No. 1, the Board advised cost eligible intervenors that they should be aware that the OEB will not generally allow the recovery of costs for the attendance of more than one representative of any party, unless a compelling reason is provided when cost claims are filed.

Energy+ notes that VECC was represented by two consultants through the course of this proceeding. Energy+ acknowledges that the attendance costs for CCC, SEC, and VECC are similar, even though VECC was represented by two consultants.

- Energy+ is concerned with the amounts claimed by VECC with respect to Preparation Costs. VECC's total claim for Preparation is \$54,207, which is over double compared to CCC's costs of \$22,632.50 and SEC of \$23,023.00.

The following table summarizes the Preparation Costs by each intervenor:

**Table 2: Summary of Preparation Costs by Intervenor (excluding HST)**

Intervenor	Preparation							Grand Total
	ADR - Settlement Conference	Argument	Interrogatories	Issues Conference	Oral Hearing	Other Conferences	Technical Conference	
	CCC	\$ 5,172.50	\$ 4,455.00	\$ 7,395.00	\$ 495.00	\$ 2,970.00		
SEC	\$ 1,886.00	\$ 6,969.00	\$ 6,693.00		\$ 3,588.00	\$ 2,737.00	\$ 1,150.00	\$ 23,023.00
VECC	\$ 9,652.50	\$ 14,899.50	\$ 13,200.00	\$ 165.00	\$ 8,535.00	\$ 1,650.00	\$ 6,105.00	\$ 54,207.00
<b>Grand Total</b>	<b>\$ 16,711.00</b>	<b>\$ 26,323.50</b>	<b>\$ 27,288.00</b>	<b>\$ 660.00</b>	<b>\$ 15,093.00</b>	<b>\$ 4,387.00</b>	<b>\$ 9,400.00</b>	<b>\$ 99,862.50</b>

The following table summarizes the Hours by each intervenor:


**Table 3: Summary of Hours by Intervenor**

Intervenor	Hours				Grand Total
	Attendance	Preparation	Proposal		
			Preparation	Responses	
<b>CCC</b>	<b>44.50</b>	<b>70.25</b>	<b>3.50</b>	<b>3.50</b>	<b>121.75</b>
Julie Girvan	43.00	56.50	3.50		103.00
Shelley Grice	1.50	13.75		3.50	18.75
<b>SEC</b>	<b>62.90</b>	<b>100.10</b>	<b>3.70</b>	<b>6.90</b>	<b>173.60</b>
Mark Rubenstein	62.90	100.10	3.70	6.90	173.60
<b>VECC</b>	<b>37.50</b>	<b>165.10</b>	<b>10.50</b>	<b>2.00</b>	<b>215.10</b>
Bill Harper	22.00	101.75	1.50		125.25
Chandler Buchanan		1.20			1.20
John Lawford		2.90			2.90
Mark Garner	15.50	59.25	9.00	2.00	85.75
<b>Grand Total</b>	<b>144.90</b>	<b>335.45</b>	<b>17.70</b>	<b>12.40</b>	<b>510.45</b>

While Energy+ acknowledges that this application had certain complexities with respect to cost allocation and rate design, Energy+ submits that the Board should consider reducing the preparation costs submitted by VECC to a level consistent with the average for CCC and SEC.

Yours truly,

**Energy+ Inc.**



Sarah Hughes, CPA, CA  
Chief Financial Officer

c.c. John Vellone, Borden Ladner Gervais  
John Lawford, Public Interest Advocacy Centre (VECC)