

September 9, 2021

Ontario Energy Board
By electronic filing and e-mail

Attn: Christine E. Long, Registrar and Board Secretary

Dear Ms Long:

Re: EB-2020-0091, EGI – IRP – GEC Reply to EGI Objections to Cost Claims

We write in reply to Enbridge's letter of September 9th containing its objections to GEC's cost claim in this matter.

EGI has offered an overly simplistic analysis of the hours claimed. We note:

Mr. Stier's letter repeatedly compares the hours of the parties most engaged on IRP and related DSM issues with the hours of parties that are less engaged or are more narrowly focused on their particular customer segment. This cherry-picking approach should be rejected.

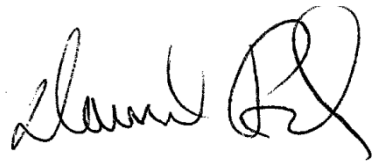
More egregious, is the simple comparison of GEC's counsel hours to the hours of parties that were not sponsoring evidence. Sponsoring evidence requires a number of time consuming steps including, assessment of evidence needs, selection of expert, settling report scope, submission of evidence proposal to the Board, ongoing oversight and feedback on expert efforts, coordination of presentation day presentation, review of incoming IRs, review of draft IR responses, development of evidence-in-chief, preparation of expert for standing cross, coordination with co-sponsoring parties and parties relying on our lead evidence role throughout, responding in argument to issues arising from our evidence etc.. As we noted in our cover letter with our cost claim, we received extensive IRs requiring 71 pages in response. Clearly our evidence raised a number of important issues that parties felt were relevant and that they wished to pursue further.

EGI draws attention to the variance between our claim and the evidence proposal we had filed earlier. As noted, the proposal did not anticipate, and could not have anticipated, a significant technical conference, presentation days, or the refiling of EGIs expert's report and EGI's plan proposal, or the extent of IRs.

Further, despite calling for scrutiny of the difference in hours spent by the various parties, EGI offers no meaningful analysis that recognizes the different level of contribution to the process such as extent of interrogatories, scope and extent of argument, efforts to coordinate intervenors and avoid duplication etc..

We would respectfully suggest that the Board consider the hours of its non-administrative staff as a more meaningful benchmark for comparison.

Respectfully,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized, looping flourish at the end.

David Poch

On Behalf of GEC

Cc: Enbridge