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May 11, 2023

Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

RE: Bluewater Power Distribution Corporation Cost Claims EB-2022-0016

Dear Ms. Marconi,

Bluewater Power Distribution Corporation (“Bluewater”) is in receipt of the cost claims from the Intervenor participants that participated in Bluewater’s 2023 Cost of Service rate application. The claims have been summarized below:

Intervenor	Hours Billed	Total Cost Claim (Excluding HST)
AMPCO	59.75	\$19,717.50
CCC	52.50	\$17,325.00
CCMBC	47.50	\$15,675.00
SEC	120.00	\$39,699.00
VECC	74.00	\$24,420.00

In reviewing the cost claims Bluewater notes that School Energy Coalition (“SEC”) claimed time for attendance of two participants at the Settlement Conference despite the OEB’s direction in Procedural Order #1 which stipulated that:

“Cost eligible intervenors 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.”

Bluewater Power further notes that while the Vulnerable Energy Consumers Coalition (“VECC”) also claimed time for two participants at the Settlement Conference, VECC split the cost claim for that time in order to respect the OEB’s limit on the recovery of costs for attendance to one participant. The average of the four other intervenors related to attendance at the Settlement Conference is 18.3 hours, and SEC submitted 38.5 hours, which is over double that of the average. Bluewater also notes that generally, SEC’s total cost claim is 106% higher than the average of the four other intervenors.

Bluewater respectfully requests that the OEB review the cost claim for SEC in regard to the number of hours submitted for the Settlement Conference.

Sincerely,

A handwritten signature in blue ink that reads "L. Dugas".

Leslie Dugas
Director, Regulatory and Customer Service
Bluewater Power Distribution Corporation
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Phone: 519-337-8201 Ext 2255