



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

September 4, 2025

OEB VIA – RESS

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

PIAC File # 7097

Dear Mr. Murray:

**Re: EB-2024-0021 – ERTH Power Corporation 2025 Rates ICM Application
Cost Claim Vulnerable Energy Consumers Coalition (VECC)**

On behalf of the Vulnerable Energy Consumers Coalition (VECC) we have enclosed VECC cost claim with respect to the above-noted proceeding.

We have also directed a copy to the Applicant via email.

VECC worked closely with the School Energy Coalition (SEC) on most procedural activities. VECC coordinated with SEC in the preparation of interrogatories, preparation for the Technical Conference and preparation for the Settlement Conference. Specifically, VECC and SEC scheduled meetings and worked together to prepare a first offer in advance of the Settlement Conference which decreased the amount of hours in settlement discussions. In addition, SEC and VECC worked together to propose additional procedural steps and SEC took the lead and prepared correspondence related to these procedural steps on behalf of both SEC and VECC. VECC consulted with SEC in the preparation of draft submissions and SEC shared its draft submission with VECC in advance.

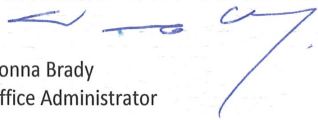
VECC submits that its participation in this proceeding was thorough and responsible, and it sought to coordinate with SEC where appropriate. Accordingly, VECC requests reimbursement of its reasonably incurred costs as set out in this letter and the attached documentation.

Please note that we have MOVED and when submitting payment for cost claim please send payment to:

**Payee: Public Interest Advocacy Centre
512-900 Greenbank Road
Nepean, ON
K2J 4P6**

If you would like to set up payment by EFT please contact me via email dbrady@piac.ca and send me the form and I can provide our banking details.

Thank you.


Donna Brady
Office Administrator

Cc: ERTH – Graig Pettit – grai.g.pettit@erthpower.com
ERTH - Megan Gooding – megan.gooding@erthpower.com

EB-2024-0021 : 1 : Donna Brady

COST CLAIM NUMBER 2856	SUBMISSION DEADLINE DATE September 04, 2025	CLAIM STATUS Submitted
EB# EB-2024-0021: Rates: Distribution: ERTH Power Corporation	OTHER EB#S	PHASE #* 1
INTERVENOR Brady, Donna; +1 (613) 562-4002 x.121 dbrady@piac.ca	INTERVENOR COMPANY* Vulnerable Energy Consumers Coalition, Toronto:	INTERVENOR TYPE Qualifying Non-Profit
HST RATE ONTARIO 3.94	EXCHANGE RATE	COUNTRY
HST NUMBER 130592405RT0001	LATE SUBMISSION ALLOWED No	EXTENSION DEADLINE DATE

PARTICIPANTS

New	Non-Filing Participant First, Last Name	Filing Participant	Total (\$)	Total Hours	Participant Claim Status
No	,	Grice, Shelley; +1 (647) 880-9942 shelley.grice@rogers.com	23,601.39	63.25	Submitted

ATTACHMENTS

Attachment	Document Type	Import Message
VECC Cover Letter EB 2024-0021 Sept-4-2025.pdf	Cover Letter	

TOTAL LEGAL/CONSULTANT/OTHER FEES 22,706.75	TOTAL DISBURSEMENTS 0.00	TOTAL HST 894.64
TOTAL CLAIM 23,601.39	TOTAL AMOUNT AWARDED	
TOTAL HOURS CLAIMED 63.25	TOTAL HOURS DISALLOWED	
REASON FOR DISALLOWANCE	REASON FOR DISALLOWANCE - 2	REASON FOR DISALLOWANCE - 3

MAKE CHEQUE PAYABLE TO
Public Interest Advocacy Centre

SEND PAYMENT TO ADDRESS
512-900 Greenbank Road
Nepean, ON
K2J 4P6

ATTENTION
Donna Brady

SUBMIT SECTION

I am a representative of the Party. I have examined all of the documentation in support of this cost claim. The costs incurred and time spent are directly related to the Party's participation in the OEB Process referred to above.

This cost claim does not include any costs for work done, or time spent, by a person that is an employee or officer of the Party as described in section 6.05 and 6.09 of the OEB's Practice Direction on Cost Awards.

The information (fees and disbursements) filed in this cost claim is complete and accurate and in accordance with the OEB's Practice Direction for Cost Awards and Appendix A, the Cost Awards Tariff.

SUBMITTED BY
Donna Brady

DATE SUBMITTED
September 04, 2025

CASE EB-2024-0021: Rates: Distribution: ERTH Power Corporation	COST CLAIM EB-2024-0021 : 1 : Donna Brady	INTERVENOR NAME Brady, Donna; +1 (613) 562-4002 x.121 dbrady@piac.ca	PARTICIPANT CLAIM STATUS Submitted
FILING PARTICIPANT Grice, Shelley; +1 (647) 880-9942 shelley.grice@rogers.com	NEW PARTICIPANT No	NON-FILING PARTICIPANT F. NAME	NON-FILING PARTICIPANT L. NAME
SERVICE PROVIDER TYPE* Consultant	YEAR CALLED TO BAR*	COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE* 24	HOURLY RATE 359
HST RATE CHARGED* 3.94	CV STATUS (FOR CONSULTANT/ANALYST) CV Provided within Previous 24 Months	LAST CV DATE February 21, 2024	OVERRIDE HOURLY RATE No
HST NUMBER 130592405RT0001	HEARINGS Yes	CONSULTATIONS No	DISBURSEMENTS No

HEARINGS

Hearings Hours		Hearings Subtotal (\$)		Hearings Total Tax (\$)		Hearings Total (\$)	
63.25		22,706.75		894.64		23,601.39	
<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>	
DISCOVERY							
Read and Research Application and Evidence	2.50	359	897.50	3.94	35.36	932.86	
Preparation of Interrogatories	7.50	359	2,692.50	3.94	106.08	2,798.58	
Review Interrogatory Responses	5.75	359	2,064.25	3.94	81.33	2,145.58	
Technical Conference Preparation	8.50	359	3,051.50	3.94	120.23	3,171.73	
Technical Conference Attendance	4.50	359	1,615.50	3.94	63.65	1,679.15	
Technical Conference Follow-up	2.50	359	897.50	3.94	35.36	932.86	
Subtotal of DISCOVERY	31.25		11,218.75		442.01	11,660.76	
PROCEDURAL							
Preparation of Issues List Submission		359		3.94			
Attendance at Issues List Conference		359		3.94			
Preparation for a Confidentiality Request		359		3.94			
Prepare Submissions on Confidentiality		359		3.94			
Preparation of Motion(s) Materials		359		3.94			
Prepare Submissions on the Motion(s)		359		3.94			
Attendance at Hearing on Motion(s)		359		3.94			
Review Procedural Documents	0.25	359	89.75	3.94	3.54	93.29	

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
Subtotal of PROCEDURAL	0.25		89.75		3.54	93.29
INTERVENOR EVIDENCE						
Preparation of Intervenor Evidence		359		3.94		
Interrogatory Responses		359		3.94		
Preparation of Witness(es) for Attendance at Hearing		359		3.94		
Subtotal of INTERVENOR EVIDENCE	0.00		0.00		0.00	0.00
SETTLEMENT CONFERENCE						
Preparation for Settlement Conference	10.00	359	3,590.00	3.94	141.45	3,731.45
Attendance at Settlement Conference	7.25	359	2,602.75	3.94	102.55	2,705.30
Preparation of Settlement Proposal		359		3.94		
Attendance at Presentation to Panel		359		3.94		
Subtotal of SETTLEMENT CONFERENCE	17.25		6,192.75		244.00	6,436.75
WRITTEN ARGUMENT						
Written Submissions	14.00	359	5,026.00	3.94	198.02	5,224.02
Subtotal of WRITTEN ARGUMENT	14.00		5,026.00		198.02	5,224.02
ORAL ARGUMENT						
Preparation for Oral Hearing		359		3.94		
Attendance at Oral Hearing		359		3.94		
Oral Submissions		359		3.94		
Attendance at Oral Submissions		359		3.94		
Subtotal of ORAL ARGUMENT	0.00		0.00		0.00	0.00
DECISION						
Review Decision	0.50	359	179.50	3.94	7.07	186.57
Review Rate/Accounting Order		359		3.94		
Prepare Submission on Rate Order		359		3.94		
Subtotal of DECISION	0.50		179.50		7.07	186.57
OTHER						
Other Attendance (e.g., Intervenor Conferences)		359		3.94		
Subtotal of OTHER	0.00		0.00		0.00	0.00
TOTAL SERVICE PROVIDER FEES						
Total Service Provider Fees	63.25		22,706.75		894.64	23,601.39

Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
SG Invoice.pdf	Invoice	
SG Timesheet.pdf	Time Docket	

Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
SG Invoice.pdf	Invoice	Hearings	
SG Timesheet.pdf	Time Docket	Hearings	

Name: Shelley Grice

PROJECT TIME SHEET		DATE	INVOICE
EB-2024-0021		09/02/2025	#V25-09
ERTH Power Corporation - 2025 Rates: ICM (Building)			
PROJECT TIME SHEET			
DATE	TASK DESCRIPTION	CHARGE TYPE	Hours
2024-11-05	Review application & evidence; emails to client; Prepare VECC Letter of Intervention	Read & Research Application and Evidence	0.50
2024-11-28	Review PO#1; Review & consider application & evidence	Read & Research Application and Evidence	2.00
2024-11-30	Review & consider application & evidence; Prepare interrogatories	Preparation of Interrogatories	1.75
2024-12-02	Emails; Call w/M. Rubenstein re: process; Review evidence & prepare interrogatories	Preparation of Interrogatories	3.00
2024-12-04	Review evidence & finalize interrogatories; emails; call w/M. Rubenstein to finalize cover letter	Preparation of Interrogatories	2.75
2024-12-09	Discuss ERTH letter; Review & discuss SEC reply letter w/ M. Rubenstein	Review Procedural Documents	0.25
2025-01-08	Review interrogatory responses; Review draft SEC/VECC letter; Review & consider SEC-1 attachments	Review Interrogatory Responses	2.25
2025-01-12	Review interrogatory responses; Review PO#3	Review Interrogatory Responses	1.50
2025-01-14	Review interrogatory responses; Prepare VECC letter re:procedural next steps; Review SEC draft letter; Discuss w/SEC	Review Interrogatory Responses	2.00
2025-01-23	Review evidence & prepare for Technical Conference; Review PO#4	Technical Conference Preparation	0.75
2025-01-29	Review evidence & prepare for Technical Conference; Prepare letter re time estimate	Technical Conference Preparation	0.75
2025-02-03	Review evidence & prepare for Technical Conference; review emails	Technical Conference Preparation	1.75
2025-02-04	Review evidence & prepare for Technical Conference; Call w/J. Scott	Technical Conference Preparation	3.00
2025-02-05	Review evidence & prepare for Technical Conference; Review previous ICMs	Technical Conference Preparation	2.25
2025-02-06	Attend Technical Conference	Technical Conference Attendance	4.50
2025-02-19	Review Undertaking Responses	Technical Conference Follow-up	2.50

2025-02-25	Discuss case w/M. Rubenstein; emails	Preparation for Settlement Conference	0.25
2025-03-06	Review SEC Clarification Questions; Prepare for Settlement	Preparation for Settlement Conference	0.50
2025-03-11	Review evidence & Prepare for Settlement Conference; Prepare pre-settlement questions	Preparation for Settlement Conference	4.25
2025-03-18	Meeting with SEC (M. Rubenstein & J. Scott) re: Evidence & Settlement; Prepare options for Settlement; Consider previous ICMs	Preparation for Settlement Conference	3.00
2025-03-19	Discussion with SEC re: Settlement Conference; Prepare for settlement/build draft offers; Review responses to questions; emails w/SEC	Preparation for Settlement Conference	2.00
2025-03-20	Attend Settlement Conference	Attendance at Settlement Conference	6.50
2025-03-21	Attend Settlement Conference	Attendance at Settlement Conference	0.75
2025-03-25	Prepare submission outline; Call w/M. Rubenstein	Written Submissions	0.75
2025-03-27	Review correspondence; Review EARTH Letter; emails	Written Submissions	0.25
2025-03-31	Discuss SEC/VECC letter re: hearing format; Review OEB Staff Letter	Written Submissions	0.25
2025-04-03	Discuss next steps re submission w/M. Rubenstein	Written Submissions	0.25
2025-04-15	Review evidence & prepare submissions; Review PO#6	Written Submissions	1.00
2025-04-23	Review EARTH Argument-in-Chief; Review evidence; Prepare written Submissions	Written Submissions	2.00
2025-04-24	Review evidence & prepare submissions	Written Submissions	2.25
2025-04-25	Review evidence & prepare submissions; Call w/M. Rubenstein re submissions	Written Submissions	2.75
2025-04-27	Review evidence & prepare submissions; Review SEC draft submissions	Written Submissions	3.50
2025-04-28	Review evidence & finalize submissions	Written Submissions	1.00
2025-07-10	Review Decision; emails w/SEC & client	Review Decision	0.50
TOTAL			63.25

Shelley Grice, P. Eng.

46 Scarborough Road, Toronto ON M4E 3M5

INVOICE #V25-09

September 2, 2025

Public Interest Advocacy Centre
2-285 McLeod
Ottawa, Ontario
K2P 1A1

Attention: Geoff White/Donna Brady

Re: EARTH Power Corporation - ICM (Building)
EB-2024-0021

Description	Charge Type	Hours	Rate	Amount
Professional Services of Shelley Grice	Review Application	2.50	\$359.00	\$897.50
	Prepare Interrogatories	7.50	\$359.00	\$2,692.50
	Review Responses	5.75	\$359.00	\$2,064.25
	Attendance - TC & ADR	11.75	\$359.00	\$4,218.25
	Preparation	21.25	\$359.00	\$7,628.75
	Written Submission	14.00	\$359.00	\$5,026.00
	Review Decision	0.50	\$359.00	\$179.50
Sub-Total				\$22,706.75
HST on Services				\$2,951.88
Disbursements				
HST on Disbursements				
GST#		63.25	TOTAL	\$25,658.63
817042757RT0001				

Details are included in the attached time sheet.
Please make cheque payable to Shelley Grice.

Sincerely,



Shelley Grice, P. Eng.

