



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.

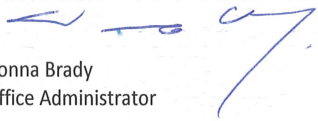
VECC submits that its participation in this proceeding was thorough and responsible, and it sought to coordinate with SEC where appropriate. Accordingly, VECC requests reimbursement of its reasonably incurred costs as set out in this letter and the attached documentation.

**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](mailto: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](mailto:grai.g.pettit@erthpower.com)  
ERTH - Megan Gooding – [megan.gooding@erthpower.com](mailto:megan.gooding@erthpower.com)

## EB-2024-0021 : 1 : Donna Brady

COST CLAIM NUMBER  
2856

SUBMISSION DEADLINE DATE  
September 04, 2025

CLAIM STATUS  
Approved by Finance

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<br>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  |                |
| VECC EB-2024-0021 Cost Claim 090420251605.pdf  |               |                |

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

|                                                                                            |                                                                                           |                                                                                      |                                                  |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------|
| <b>CASE</b><br>EB-2024-0021: Rates:<br>Distribution: ERTH Power<br>Corporation             | <b>COST CLAIM</b><br>EB-2024-0021 : 1 : Donna<br>Brady                                    | <b>INTERVENOR NAME</b><br>Brady, Donna; +1 (613)<br>562-4002 x.121<br>dbrady@piac.ca | <b>PARTICIPANT<br/>CLAIM STATUS</b><br>Submitted |
| <b>FILING PARTICIPANT</b><br>Grice, Shelley; +1 (647) 880-9942<br>shelley.grice@rogers.com | <b>NEW<br/>PARTICIPANT</b><br>No                                                          | <b>NON-FILING<br/>PARTICIPANT F. NAME</b>                                            | <b>NON-FILING<br/>PARTICIPANT L. NAME</b>        |
| <b>SERVICE PROVIDER TYPE*</b><br>Consultant                                                | <b>YEAR CALLED TO BAR*</b>                                                                | <b>COMPLETED YEARS<br/>PRACTICING/YEARS OF<br/>RELEVANT EXPERIENCE*</b><br>24        | <b>HOURLY RATE</b><br>359                        |
| <b>HST RATE CHARGED*</b><br>3.94                                                           | <b>CV STATUS (FOR<br/>CONSULTANT/ANALYST)</b><br>CV Provided within Previous<br>24 Months | <b>LAST CV DATE</b><br>February 21, 2024                                             | <b>OVERRIDE<br/>HOURLY RATE</b><br>No            |
| <b>HST NUMBER</b><br>130592405RT0001                                                       | <b>HEARINGS</b><br>Yes                                                                    | <b>CONSULTATIONS</b><br>No                                                           | <b>DISBURSEMENTS</b><br>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<br/>Rate</u> | <u>Sub Total</u> | <u>HST<br/>Rate</u>     | <u>HST</u>    | <u>Total</u>        |  |
| <b>DISCOVERY</b>                           |              |                        |                  |                         |               |                     |  |
| 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              |  |
| <b>Subtotal of DISCOVERY</b>               | <b>31.25</b> |                        | <b>11,218.75</b> |                         | <b>442.01</b> | <b>11,660.76</b>    |  |
| <b>PROCEDURAL</b>                          |              |                        |                  |                         |               |                     |  |
| 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<br/>Rate</u> | <u>Sub Total</u> | <u>HST<br/>Rate</u> | <u>HST</u>    | <u>Total</u>     |
|---------------------------------------------------------|--------------|------------------------|------------------|---------------------|---------------|------------------|
| <b>Subtotal of PROCEDURAL</b>                           | <b>0.25</b>  |                        | <b>89.75</b>     |                     | <b>3.54</b>   | <b>93.29</b>     |
| <b>INTERVENOR EVIDENCE</b>                              |              |                        |                  |                     |               |                  |
| Preparation of Intervenor Evidence                      |              | 359                    |                  | 3.94                |               |                  |
| Interrogatory Responses                                 |              | 359                    |                  | 3.94                |               |                  |
| Preparation of Witness(es) for Attendance<br>at Hearing |              | 359                    |                  | 3.94                |               |                  |
| <b>Subtotal of INTERVENOR EVIDENCE</b>                  | <b>0.00</b>  |                        | <b>0.00</b>      |                     | <b>0.00</b>   | <b>0.00</b>      |
| <b>SETTLEMENT CONFERENCE</b>                            |              |                        |                  |                     |               |                  |
| 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                |               |                  |
| <b>Subtotal of SETTLEMENT<br/>CONFERENCE</b>            | <b>17.25</b> |                        | <b>6,192.75</b>  |                     | <b>244.00</b> | <b>6,436.75</b>  |
| <b>WRITTEN ARGUMENT</b>                                 |              |                        |                  |                     |               |                  |
| Written Submissions                                     | 14.00        | 359                    | 5,026.00         | 3.94                | 198.02        | 5,224.02         |
| <b>Subtotal of WRITTEN ARGUMENT</b>                     | <b>14.00</b> |                        | <b>5,026.00</b>  |                     | <b>198.02</b> | <b>5,224.02</b>  |
| <b>ORAL ARGUMENT</b>                                    |              |                        |                  |                     |               |                  |
| 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                |               |                  |
| <b>Subtotal of ORAL ARGUMENT</b>                        | <b>0.00</b>  |                        | <b>0.00</b>      |                     | <b>0.00</b>   | <b>0.00</b>      |
| <b>DECISION</b>                                         |              |                        |                  |                     |               |                  |
| 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                |               |                  |
| <b>Subtotal of DECISION</b>                             | <b>0.50</b>  |                        | <b>179.50</b>    |                     | <b>7.07</b>   | <b>186.57</b>    |
| <b>OTHER</b>                                            |              |                        |                  |                     |               |                  |
| Other Attendance (e.g., Intervenor<br>Conferences)      |              | 359                    |                  | 3.94                |               |                  |
| <b>Subtotal of OTHER</b>                                | <b>0.00</b>  |                        | <b>0.00</b>      |                     | <b>0.00</b>   | <b>0.00</b>      |
| <b>TOTAL SERVICE PROVIDER FEES</b>                      |              |                        |                  |                     |               |                  |
| <b>Total Service Provider Fees</b>                      | <b>63.25</b> |                        | <b>22,706.75</b> |                     | <b>894.64</b> | <b>23,601.39</b> |

## 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         |
| <b>TOTAL</b> |                                                                                                                                       |                                       | <b>63.25</b> |

# 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<br>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.

