

June 25, 2026

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Via email: registrar@oeb.ca

EB-2024-0115 Hydro Ottawa 2026-2030 Custom Rate Application
CAFES Ottawa Cost Claim Reply

Thank you for the opportunity to comment on Hydro Ottawa's June 18, 2026 letter on intervenor cost claims. CAFES Ottawa appreciates Hydro Ottawa's attempt to do a comparison between intervenors and also using a historical comparison to its previous rate application five years ago. Unfortunately, the consolidated numbers calculated by Hydro Ottawa and resulting analysis conducted does not actually represent the information available in support of CAFES Ottawa's Cost Claim. Although it is not possible to replicate Hydro Ottawa's analysis based on the information they provided, comments are provided below to highlight some of the errors and CAFES Ottawa requests that the Ottawa Hydro letter of comment be dismissed as inaccurate in relation to the actual Cost Claim submitted by CAFES Ottawa.

Hydro Ottawa's analysis compares each intervenor's hours and costs in this proceeding against the 2021-2025 Hydro Ottawa rate proceeding (EB-2019-0261)¹. That comparison does not apply to CAFES Ottawa. CAFES Ottawa was not an intervenor in the 2021-2025 proceeding. Hydro Ottawa is therefore measuring CAFES Ottawa's costs against a fictional baseline, so any amount claimed appears as a large increase. Adding CAFES Ottawa's Cost Claim to another intervenor that participated in the previous rates case is clearly not appropriate. This error runs through Tables 1, 3, 4, 5 and 6 and is the foundation for the reductions recommended in Table 2. Based on the actual information available, there is no basis for Hydro Ottawa's proposed reduction to the CAFES Ottawa claim.

¹ EB-2019-0261.

On the data Hydro Ottawa itself provides, the CAFES Ottawa claim is reasonable. At \$36,618 (pre-HST), it is 73% below the highest intervenor claim and 34% below the average cost claim². Compared only against intervenors that participated in the same activities — BOMA, CCC, SEC and VECC — it is approximately 63% below their average³.

Hydro Ottawa also treats CAFES Ottawa's claim as if it should be consolidated with Pollution Probe's because the two intervenors retained the same consultant. No OEB rule supports this and CAFES Ottawa submitted its individual Cost Claim in accordance with OEB requirements. CAFES Ottawa is a separate approved intervenor (Procedural Order No. 1, in which Hydro Ottawa raised no objection to CAFES Ottawa's intervention). Summing two intervenors' claims and benchmarking the total against others has no basis in the OEB's rules or in the procedural direction for this proceeding. Coordinating to avoid duplication and double-billing is not the same as merging two interventions into one.

Using the same consultant as Pollution Probe was an efficiency, not a liability. Splitting common activities, where possible — evidence review, intervenor/OEB Staff coordination, the technical conference, the settlement conference and settlement iterations, often on a 50% basis — reduced the CAFES Ottawa claim by roughly 84 hours relative to participating without using that efficient approach. The cost sharing is clearly documented in the time docket submitted. A proper assessment uses CAFES Ottawa's own post-split hours, not the combined figure.

Hydro Ottawa identifies only one CAFES-specific item: 3.5 hours on the draft Issues List, which it suggests reducing by 2.5 hours on the assumption that CAFES Ottawa is a new participant. CAFES Ottawa is not new to OEB proceedings and incurred no learning time. As documented in the time docket, this work was local ratepayer/stakeholder coordination and direct coordination with OEB Staff; the final Issues List approved by the OEB reflects these activities.

On technical conference follow-up, the correct CAFES Ottawa figure is 4.5 hours — below comparable intervenors — not the 8.5-hour combined PP/CAFES total Hydro Ottawa used.

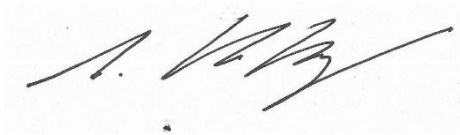
² Per HOL_Letter_Cost_Awards_20260618, table 1. CAFES Ottawa's Cost Claim is \$36,618 on a pre-HST basis and the average is \$557,742/10 intervenors = \$55,774.

³ Compared to the average (\$393,937 / 4 = \$98,484) of BOMA, CCC, SEC and VECC which participated in all similar elements based on the time sheet details.

A line-by-line comparison of the time dockets shows which intervenors participated in the same procedural steps as CAFES Ottawa. On that basis, CAFES Ottawa's hours are less than half the relevant peer average⁴. Even Hydro Ottawa's incorrect addition of two intervenor (CAFES Ottawa and Pollution Probe) cost claims falls below that peer group.

CAFES Ottawa participated fully and efficiently, met every condition in Procedural Order No. 1, and documented its cost-sharing and the resulting savings in its claim. We respectfully request cost recovery as detailed in the attached Cost Claim. Please contact Michael Brophy at 647-330-1217 or michael.brophy@rogers.com with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Keller-Herzog', is written on a light-colored background.

Angela Keller-Herzog
Executive Director
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⁴ Time docket comparison activities align with those of CCC, SEC, VECC and BOMA when compared line by line.