



June 25, 2026

VIA RESS

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

Dear Mr. Murray,

**Re: Hydro Ottawa Limited (“HOL”)
Custom Incentive Rate-Setting Application for 2026-2030
OEB File No.: EB-2024-0115**

We are counsel to the Distributed Resource Coalition (“**DRC**”) in the above-noted proceeding (the “**Proceeding**”). We write in reply to HOL’s targeted objection to DRC’s cost claim set out in its letter dated June 18, 2026 (the “**Letter**”).

DRC respectfully submits that the OEB should reject HOL’s proposed reduction and that DRC’s full cost claim should be approved, subject only to the limited clarification below regarding the re-categorization of certain time entries. HOL’s objection appears to be based primarily on the manner in which DRC’s time was categorized for preparation and attendance at the Settlement Conference, the presentation of the Settlement Proposal, and the oral hearing. Respectfully, HOL’s objection does not accurately reflect the substance of DRC’s dockets or the work performed throughout all stages of the Proceeding.

DRC also wishes to emphasize its exceptionally limited claimed costs as compared to most other intervenors in the Proceeding, as evident in HOL’s own assessments provided in the Letter. DRC had the second lowest total claimed costs of all intervenors (\$26,956) and was well below the average total intervenor claimed costs (\$69,717.75). DRC takes regulatory and cost efficiency seriously, and, as noted in DRC’s cost claim, DRC took a surgical, principled, and coordinated approach, in accordance with direction from the OEB for intervenor coordination, to the issues in the Proceeding. DRC also coordinated with other intervenors to avoid overlap and maximize efficiency in all aspects of the Proceeding, including close coordination with intervenors with similar interests in preparation for and during the Settlement Conference and in other aspects of the Proceeding, all in an effort to reduce time, resources, and costs.

Settlement Conference. With respect to the Settlement Conference, DRC’s dockets clearly identified that the relevant time included both preparation for, and attendance at, the Settlement Conference. While the time was entered under the attendance category, the docket descriptions made clear that the time was not limited to attendance and included preparation for the Settlement Conference. Any categorization issue is an administrative allocation issue that does not justify a substantive reduction to DRC’s recoverable costs. When preparation and attendance are considered together, DRC’s Settlement Conference-related time is reasonable.

DRC has reviewed the cost claims of other intervenors and understands that DRC's total preparation and attendance time for the Settlement Conference was similar to, or lower than, the total Settlement Conference-related time claimed by many other intervenors.

DRC has previously taken the approach that preparation time for the Settlement Conference that occurs prior to the start of the Settlement Conference is tracked in the preparation category whereas preparation time spent during the Settlement Conference is categorized in the attendance category owing to the overlapping nature of preparation, review and actual meetings with the intervenor group. However, DRC appreciates HOL's diligent review and alternative understanding for categorization, and, for greater consistency, DRC will endeavour to docket time spent preparing for the Settlement Conference, while the Settlement Conference is occurring, separately from attendance at the Settlement Conference to avoid future misunderstandings. Accordingly, DRC respectfully submits that HOL's suggested reductions related to the Settlement Conference should be rejected in their entirety.

Oral Hearing and Settlement Proposal Presentation. DRC also disagrees with HOL's suggested reduction in relation to the oral hearing phase of the Proceeding. HOL suggests that DRC's oral hearing time may reflect a clerical error or disproportionate resource allocation. DRC acknowledges that, on further review, there appears to have been a limited categorization error in the oral hearing portion of its claim. Specifically, approximately 1.5 hours appear to have been recorded under the oral hearing category when they should more properly have been recorded as attendance at the presentation of the Settlement Proposal which occurred on the same day.

DRC also acknowledges that its Day 1 oral hearing attendance entry appears higher than the attendance time recorded by certain other intervenors for the same day. DRC took the opportunity to review the transcript from the first day of the oral hearing and notes that it started at 9h36 am and ended at 17h19, approximate 8 hours. Counsel for DRC attended in person and we note the relevant dockets, which included time spent in preparation for the presentation of the Settlement Proposal, as well as a review of oral hearing materials prior to the start of the oral hearing, is consistent with the timing of Day 1. This limited category allocation difference does not support HOL's proposed reduction. It reflects a difference in allocation of time between procedural categories, not time that was unnecessary, duplicative, or imprudently incurred by DRC.

DRC further notes that, upon review of its cost claims materials, there was a clerical error in the date of one oral hearing preparation docket. The existing docket dated January 14 for oral hearing preparation should have been dated January 15. This is clear from the sequence of the submitted dockets, as the January 14 preparation entry appears after the January 15 oral hearing attendance entry and is simply a date-entry issue.

DRC respectfully submits that HOL's suggested reductions should be rejected in their entirety. However, if the OEB concludes that some portion of DRC's entries related to preparation for and attendance at the presentation day/first day of the oral hearing should be reallocated or modestly reduced, DRC submits that any adjustment should be very limited.

Overall cost-effectiveness of DRC's intervention. The Letter and HOL's general intervenor comparison and cost review efforts highlight DRC's exceptionally cost-efficient participation in the Proceeding. DRC did not duplicate the work of other intervenors and focused its participation on issues of particular relevance to grid modernization and energy transition preparation, distributed energy resources, non-wires solutions, and related matters within its

mandate. DRC's overall costs were modest compared with all but one other intervenor. HOL's own summary indicates that DRC's total hours increased only modestly from the prior application, with actual costs lower in the Proceeding as a result of DRC's intentional allocation of work to the most cost-effective individual. HOL's assessment also indicated that DRC's hours up to settlement were lower than in HOL's previous application proceeding, further supporting the importance DRC has placed on efficient and cost-effective participation in OEB proceedings. Those comparisons further support the reasonableness of DRC's cost claim in this Proceeding.

The OEB's cost award process should focus on whether the claimed costs were reasonably incurred and whether the intervenor's participation contributed to the OEB's process, better understanding of issues consistent with the OEB's policy objectives, and to the benefit of ratepayers, including HOL's increasing number of DER and EV customers. As noted in DRC's cost claim, its participation was focused, efficient, and within the scope of its approved intervention. We note that HOL commended DRC on its prudence and did not identify specific work that was unnecessary or duplicative. Rather, HOL's objection rests largely on categorical comparisons and differences in approaches to categorization.

For these reasons, DRC respectfully requests that the OEB reject HOL's proposed reductions. At most, the record supports a limited reallocation of time spent in preparation for the Settlement Conference and approximately 1.5 hours from the oral hearing category to attendance at the presentation of the Settlement Proposal to the Panel, and no material reduction to DRC's total recoverable costs.

Sincerely,

A handwritten signature in black ink, appearing to read "Daimir Vollmer", with a stylized, cursive script.

DT Vollmer