



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Janigan
Counsel for VECC
(613) 562-4002 x.26
mjanigan@piac.ca

December 1, 2006

VIA EMAIL

Ms. Kirsten Walli
Board Secretary
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli,

**Re: Vulnerable Energy Consumers Coalition (VECC)
EB-2006-0268 Comparison of Distributor Costs**

I am Counsel for the Vulnerable Energy Consumers Coalition. My clients have been active participants in the Board's Electricity Distribution proceedings, including recently the EB-2006 -0088/89 Generic Proceeding on Cost of Capital and Incentive Regulation.

We are concerned that the Board's letter noted above, although directed both to Electricity Distributors and to participants in the EB-2006-0088/89 does not leave both of these parties in the same position to respond. In particular intervenors such as my clients do not have the necessary financial resources to participate.

We expect that our consultants and counsel undertake a limited amount of "pro bono" work in order to be active in the Board's processes. A recent example of this was provision of VECC's comments on the EDA's proposal for a Revenue Stabilization adjustment.

However, our initial assessment is that in this case, providing meaningful comments, as requested in the Board's letter, will require much more extensive resources than are available to my clients' consultants and counsel.

We suggest that, in the interest of administrative efficiency, the Board could combine the EB-2006-0268 process with the EB-2006-0088/89 process and

change the cost eligibility ceiling to cover the provision comments on the Cohorts and Comparator issues, and extend the time for comments to be submitted.

Yours very truly,



Michael Buonaguro
Counsel for VECC