

16 August 2004

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto, ON
M4P 1E4

By e-mail and mail

Dear Sir:

Re: RP-2004-0188 - EDF-2006 Participant Funding request of GEC

GEC hereby applies for participant funding. In addition to this electronic version, we have mailed 5 hard copies as requested in your letter of August 12th. Our request is based on an estimation of the time required by the various stages outlined in the Board's notice. Because the working group schedules and process is yet to be defined, this is of necessity, an approximation. Further, it is our hope that our issues can be isolated to avoid the need for attendance throughout the process but it is difficult to forecast that at this time.

i) Interest of the GEC:

The Green Energy Coalition (GEC) is an umbrella group formed to facilitate joint intervention in OEB proceedings and other energy policy and regulation processes in Ontario. GEC is comprised of the David Suzuki Foundation, Energy Action Council of Toronto, Greenpeace Canada and Sierra Club of Canada. All of the member groups are charitable or non-profit and are environmental groups that are active on energy policy issues. The groups share an interest in sustainable energy policy including support for energy efficiency and renewable generation. Accordingly, the groups have been at the forefront in the development of DSM and DSM regulatory mechanisms in Ontario. The groups have also been highly active in the policy discussion of energy market structures, regulatory mechanisms and rate structures (particularly with respect to electricity) given the implication of these choices for conservation and alternatives to conventional supply.

The groups represent the concerns of tens of thousands of individual members. Counsel is instructed by a steering committee made up of one representative of each of the GEC's member groups.

ii) Issues and Position:

GEC expects to be active in the issues identification process, at least two of the five working groups (Rate base etc. and Rate Design), in the ADR and, as needed, in the hearing. Our concerns centre on revenue requirement, accounting treatment, rate base and rate design matters in relation to DSM and as they may influence electricity usage (for example the extent of fixed versus variable charges). We understand that the substance of DSM issues (ie. the types, management and extent of programs etc.) will be dealt with in another process but at present there is considerable uncertainty about where discussions about revenue protection and incentives structures will occur, and having discussed this with OEB staff, we are assuming that some of these regulatory accounts issues will be part of this process.

GEC's positions on these matters will reflect our general concern that LDC DSM be facilitated at an early date, that LDCs have their revenue protected and face no other disincentives to DSM from the rate setting process, that LDCs have suitable incentives for such activity (for example that LDCs not be able to obtain revenue for DSM unless it is utilized effectively), that rate structures send a suitable conservation price signal to consumers, that rates, working capital and accounting allow for utility financing of customer conservation expenses or other special charges to facilitate DSM, that other aspects such as working capital and capitalization policies are consistent with the DSM funding approach, and that the regulatory process be manageable and open. We hope to offer suggestions for streamlining the DSM regulatory process given the large number of LDCs and the anticipated role of the OPA Conservation Bureau.

iii) Budget:

Counsel: (David Poch)

Consultation with clients	4 hours
Issues days (2 @ 6 hrs)	12 hours
Attendance at 2 working groups (5 days each)	60 hours
Handbook review mtgs. in October (5 days)	30 hours
ADR (5 days)	30 hours
Hearing (5 days)	30 hours
Preparation 1 X attendance	162 hours
Prepare argument	20 hours

Sub-Total 348 hours @ \$300 = 104,400.00

GST = 7308.00

Funding sought @ \$210/hr = 73,080.00

GST = 5115.60

Counsel Disbursements:

Travel: 9 round trips Maberly-Toronto (ave. 2.5 days/trip)	
Mileage/trip: Maberly-Ottawa airport 200km @ 33.75 =	67.50
Parking at airport	45.00
Taxi from and to Pearson \$45	90.00

Hotel \$125	312.50
Meals \$50/day	125.00
Airfare	594.21

Sub-Total \$1234.21/trip X 9 = \$11,107.89
 GST = \$777.55

Case Manager/Researcher: (Kai Milyard)

Consultation with clients	4 hours
Issues days	0 hours
Attendance at 2 working groups (2.5 days each)	30 hours
Handbook review mtgs. in October (2.5 days)	15 hours
ADR (2.5 days)	15 hours
Hearing (2.5 days)	15 hours
Preparation 1 X attendance	75 hours

154 hours @ 105 = \$16,170
 GST = \$1131.90

Case Manager Disbursements:

Printing exhibits and couriers \$200.00
 GST = \$14.00

Experts: (Resource Insight - Paul Chernick, regulatory economist)

Review materials and prepare evidence: 30 hours
 Respond to interrogatories: 5 hours
 Advise counsel: 10 hours
 Attend hearing: 6 hours

51 hours @ 300.00 = \$15,300
 At tariff rates of \$210.00/hr = \$10,710.00

Expert Disbursements:

Travel Boston to Toronto	\$1500
Hotel (2 nights)	\$250
Taxis to and from airports	\$200
Meals (2 days @ 50)	\$100
Sub total	\$2050.00

Steering Committee:

4 members X 8 hours @\$150.00 = \$4800.00

Total costs: \$163,259.34

Total funding sought: \$120,356.94

iv) Funding Requested: Above costs with counsel and experts fees reduced to tariff rates and steering committee time omitted: \$120,356.94

v) Other sources of funding:

As noted above funding is sought for counsel fees and expert fees at tariff rates. The difference between tariff and market rates and the GEC steering committee costs are absorbed by the client groups, counsel and experts and total \$42,902.40. There is no other funding available.

vi) Joint efforts:

The GEC is an umbrella group specifically formed to enable the joint intervention of its members in this and other OEB processes. In addition, we routinely cooperate with other intervenors with similar or overlapping interests to avoid redundancy. In our experience other intervenors have routinely relied upon GEC to provide expertise to the process on DSM and energy efficiency related matters. GEC is prepared to expand its membership to include other parties that share a common position. We have reviewed the possibility of other known intervenors joining the GEC and have concluded there are no known opportunities at this time.

We trust this is satisfactory. If any further information is required we would be pleased to provide it upon request.

Sincerely,

A handwritten signature in black ink, appearing to read "David Poch". The signature is written in a cursive style with a large, stylized "P" and "C".

David Poch