

October 31, 2008

Robert B. Warren
T: 416-947-5075
rwarren@weirfoulds.com

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2701
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms Walli:

Re: Transition of Regulatory Accounting to International Financial Reporting Standards (“IFRS”)/Ontario Energy Board File No. EB-2008-0104

We are counsel to the Consumers’ Council of Canada (“CCC”). What follows are the comments of the CCC on the draft “Project Work Plan” prepared by Board Staff, dated October 7, 2008, and, more broadly, on the consultation process surrounding the consideration of the transition to IFRS.

The CCC, which represents the interests of residential consumers of electricity and natural gas in Ontario, was unaware of the existence of the consultative process dealing with the transition to IFRS, until we received a copy of the Comments of Mr. Shepherd’s client, the School Energy Coalition (“SEC”). Those comments indicate that the transition to IFRS will almost certainly have significant rate-making implications, including the possibility that there will be substantial increases in rates. Given those possibilities, CCC believes that the implications of the transition, including the timing and the manner of the transition, should be considered in a manner which allows ratepayers to understand the implications of the transition, and to make submissions on how the transition should be effected.

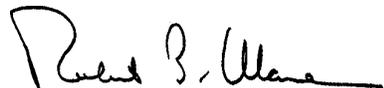
Board Staff’s draft “Project Work Plan” deals only with what might be described as the mechanical implications of the transition. It does not address the rate-making implications, or the public policy considerations which underlie those implications. In addition, the draft “Project Work Plan” makes no provision for a consultation process which includes the representatives of ratepayers.

In the circumstances, the approach proposed in the SEC’s comments seems to the CCC to be both reasonable and appropriate. Accordingly, the CCC supports the SEC’s proposal, with one additional suggestion. Given the complexity of the subject matter, and given that ratepayers have been, to this point, effectively excluded from participation, the CCC suggests that the

Board convene a meeting at which Board Staff and the utilities set out their views on the rate-making implications of the transition to IFRS. That would provide the ratepayers with a base level of information with which to start the consultation process the SEC proposes.

Yours very truly,

WeirFoulds LLP

A handwritten signature in black ink, appearing to read "Robert B. Warren". The signature is written in a cursive, flowing style.

Robert B. Warren

RBW/dlh

cc: Julie Girvan
cc: Joan Huzar
1083676.1