



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

March 24, 2025

OEB VIA – RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

PIAC File # 7077

Dear Ms. Marconi:

**Re: EB-2024-0046 – Northern Ontario Wires Inc.
Cost Claim Vulnerable Energy Consumers Coalition (VECC)**

On behalf of the Vulnerable Energy Consumers Coalition (VECC) we have enclosed VECC cost claim with respect to the above-noted proceeding. We have also directed a copy to the Applicant as well as their counsel via email.

In Procedural Order No. 1 the Board applied the small utility pilot process and cost policies to Northern Ontario Wire's (NOW) application, notwithstanding it exceeded the number of customers anticipated by that policy. As such intervenors are subject to the \$20,000 cost limit of that policy.

On a pre-tax basis VECC has met the cost criteria (\$19,965). Notwithstanding that fact we suggest this application should not have a cost limit applied.

Not only is this a larger utility than anticipated by the policy the application also included a number of unique issues needed to be addressed by the parties, including a large multi year municipal transformer station. For example, the 2025 capital budget of this Utility was 10 fold higher than that spent in 2019. The Utility sought an increase in operating expense of 65% as compared to its prior cost of service application. Furthermore, the NOW is subject to the DRP, the absence of which would have resulted in residential increases in distribution rates in the order of 37% and the application of which led to large rate impact discrepancies as between residential and other customer classes.

It is not clear to us what criteria the Board applied when it considered that this Utility's application would fit well within the abbreviated processes contemplated for a typical small utility. We can say that it required significant effort on our part to adequately participate in.

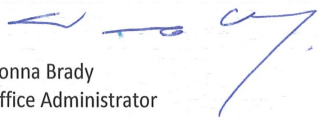
...2

Please note that we have MOVED and when submitting payment for cost claim please send payment to:

**Payee: Public Interest Advocacy Centre
314-225 Metcalfe Street
Ottawa, ON
K2P 1P9**

If you would like to set up payment by EFT please contact me at 613-562-4002 or via email dbrady@piac.ca and send me the form and I can provide our banking details.

Thank you.


Donna Brady
Office Administrator

Cc: NOWI – Marc Belanger – regulatory@nowinc.ca
Counsel – Michael Buonaguro – mikebuonaguro@me.com

EB-2024-0046 : 1 : Donna Brady

COST CLAIM NUMBER
2577

SUBMISSION DEADLINE DATE
March 27, 2025

CLAIM STATUS
Submitted

EB#
EB-2024-0046: Rates: Distribution: Northern
Ontario Wires Inc.

OTHER EB#S

PHASE #*
1

INTERVENOR
Brady, Donna; +1 (613) 562-4002 x.121
dbrady@piac.ca

INTERVENOR COMPANY*
Vulnerable Energy Consumers
Coalition, Toronto:

INTERVENOR TYPE
Qualifying Non-Profit

HST RATE ONTARIO
3.94

EXCHANGE RATE

COUNTRY

HST NUMBER
130592405RT0001

LATE SUBMISSION ALLOWED
No

EXTENSION DEADLINE DATE

PARTICIPANTS

New	Non-Filing Participant First, Last Name	Filing Participant	Total (\$)	Total Hours	Participant Claim Status
No	,	Harper, Bill; +1 (416) 348-0193 bharper.consultant@bell.net	6,945.79	20.25	Submitted
No	,	Garner, Mark; +1 (647) 408-4501 markgarner@rogers.com	13,805.82	40.25	Submitted

ATTACHMENTS

Attachment	Document Type	Import Message
VECC Cover Letter EB 2024-0046.pdf	Cover Letter	

TOTAL LEGAL/CONSULTANT/OTHER FEES
19,965.00

TOTAL DISBURSEMENTS
0.00

TOTAL HST
786.61

TOTAL CLAIM
20,751.61

TOTAL AMOUNT AWARDED

TOTAL HOURS CLAIMED
60.50

TOTAL HOURS DISALLOWED

REASON FOR
DISALLOWANCE

REASON FOR
DISALLOWANCE - 2

REASON FOR
DISALLOWANCE - 3

MAKE CHEQUE PAYABLE TO
Public Interest Advocacy Centre

SEND PAYMENT TO ADDRESS
314-225 Metcalfe Street - PLEASE NOTE NEW ADDRESS
Ottawa, ON
K2P 1P9

ATTENTION
Donna Brady

SUBMIT SECTION

I am a representative of the Party. I have examined all of the documentation in support of this cost claim. The costs incurred and time spent are directly related to the Party's participation in the OEB Process referred to above.

This cost claim does not include any costs for work done, or time spent, by a person that is an employee or officer of the Party as described in section 6.05 and 6.09 of the OEB's Practice Direction on Cost Awards.

The information (fees and disbursements) filed in this cost claim is complete and accurate and in accordance with the OEB's Practice Direction for Cost Awards and Appendix A, the Cost Awards Tariff.

SUBMITTED BY
Donna Brady

DATE SUBMITTED
March 24, 2025

CASE EB-2024-0046: Rates: Distribution: Northern Ontario Wires Inc.	COST CLAIM EB-2024-0046 : 1 : Donna Brady	INTERVENOR NAME Brady, Donna; +1 (613) 562-4002 x.121 dbrady@piac.ca	PARTICIPANT CLAIM STATUS Submitted
FILING PARTICIPANT Harper, Bill; +1 (416) 348-0193 bharper.consultant@bell.net	NEW PARTICIPANT No	NON-FILING PARTICIPANT F. NAME	NON-FILING PARTICIPANT L. NAME
SERVICE PROVIDER TYPE* Consultant	YEAR CALLED TO BAR*	COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE* 40	HOURLY RATE 330
HST RATE CHARGED* 3.94	CV STATUS (FOR CONSULTANT/ANALYST) CV Provided within Previous 24 Months	LAST CV DATE December 06, 2023	OVERRIDE HOURLY RATE No
HST NUMBER 130592405RT0001	HEARINGS Yes	CONSULTATIONS No	DISBURSEMENTS No

HEARINGS

Hearings Hours 20.25	Hearings Subtotal (\$) 6,682.50	Hearings Total Tax (\$) 263.29	Hearings Total (\$) 6,945.79
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<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
DISCOVERY						
Read and Research Application and Evidence	1.25	330	412.50	3.94	16.25	428.75
Preparation of Interrogatories		330		3.94		
Review Interrogatory Responses		330		3.94		
Technical Conference Preparation		330		3.94		
Technical Conference Attendance		330		3.94		
Technical Conference Follow-up		330		3.94		
Subtotal of DISCOVERY	1.25		412.50		16.25	428.75
PROCEDURAL						
Preparation of Issues List Submission	2.00	330	660.00	3.94	26.00	686.00
Attendance at Issues List Conference	2.75	330	907.50	3.94	35.76	943.26
Preparation for a Confidentiality Request		330		3.94		
Prepare Submissions on Confidentiality		330		3.94		
Preparation of Motion(s) Materials		330		3.94		
Prepare Submissions on the Motion(s)		330		3.94		
Attendance at Hearing on Motion(s)		330		3.94		
Review Procedural Documents	0.25	330	82.50	3.94	3.25	85.75

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
Subtotal of PROCEDURAL	5.00		1,650.00		65.01	1,715.01
INTERVENOR EVIDENCE						
Preparation of Intervenor Evidence		330		3.94		
Interrogatory Responses		330		3.94		
Preparation of Witness(es) for Attendance at Hearing		330		3.94		
Subtotal of INTERVENOR EVIDENCE	0.00		0.00		0.00	0.00
SETTLEMENT CONFERENCE						
Preparation for Settlement Conference	2.50	330	825.00	3.94	32.51	857.51
Attendance at Settlement Conference	9.50	330	3,135.00	3.94	123.52	3,258.52
Preparation of Settlement Proposal	2.00	330	660.00	3.94	26.00	686.00
Attendance at Presentation to Panel		330		3.94		
Subtotal of SETTLEMENT CONFERENCE	14.00		4,620.00		182.03	4,802.03
WRITTEN ARGUMENT						
Written Submissions		330		3.94		
Subtotal of WRITTEN ARGUMENT	0.00		0.00		0.00	0.00
ORAL ARGUMENT						
Preparation for Oral Hearing		330		3.94		
Attendance at Oral Hearing		330		3.94		
Oral Submissions		330		3.94		
Attendance at Oral Submissions		330		3.94		
Subtotal of ORAL ARGUMENT	0.00		0.00		0.00	0.00
DECISION						
Review Decision		330		3.94		
Review Rate/Accounting Order		330		3.94		
Prepare Submission on Rate Order		330		3.94		
Subtotal of DECISION	0.00		0.00		0.00	0.00
OTHER						
Other Attendance (e.g., Intervenor Conferences)		330		3.94		
Subtotal of OTHER	0.00		0.00		0.00	0.00
TOTAL SERVICE PROVIDER FEES						
Total Service Provider Fees	20.25		6,682.50		263.29	6,945.79

Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
Inv & TimeSheet BH.pdf	Time Docket and Invoice	

Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
Inv & TimeSheet BH.pdf	Time Docket and Invoice	Hearings	

WILLIAM O. HARPER

107 BAKER AVE, RICHMOND HILL

ONTARIO L4C 1X5

TELEPHONE: 905-883-1727

Email: bharper.consultant@bell.net

March 20, 2025

Statement of Costs for:

Vulnerable Energy Consumers Coalition
c/o Public Interest Advocacy Centre
200-285 McLeod Street
Ottawa, Ontario
KP2 1A1

Attn: Donna Brady

Statement No. 2025004

For Professional Services rendered re: VECC's participation in EB-2024-0046
(Northern Ontario Wires Inc.'s 2025 Rate Application)

Services (see attached)	\$	6,682.50
HST (13%)	\$	868.73
TOTAL	\$	7,551.23

PAYABLE TO: WILLIAM HARPER

HST/GST Registration #81998 6902 RT00001

<u>COST CLAIM DETAILS:</u>		<u>ONTARIO ENERGY BOARD</u>				
NAME:	BILL HARPER	HOURLY RATE:				\$330
SERVICE:	CONSULTANT	YEARS EXPERIENCE:				40
FILE #:	EB-2024-0046	PROCESS:				Northern Ontario Wires 2025 Rates
		DATE	HOURS	DETAILS	HOURLY RATE	SUB TOTAL
DISCOVERY						
-Read & Research Application	21/10/2024	1.25	Review Application	\$330.00	\$	412.50
PROCEDURAL						
- Prep for Issues Day Conf	21/10/2024	2.00	Prep Notes/Draft Questions	\$330.00	\$	660.00
- Attend Issues Day Conf	30/10/2024	2.75	Attend - Split with MG	\$330.00	\$	907.50
- Review	01/11/2024	0.25	Review Commitment List	\$330.00	\$	82.50
SETTLEMENT						
CONFERENCE/ADR						
- Preparation	06/12/2024	2.50	Review Commitment Resp /ADR Notes /Clarification Quest.	\$330.00	\$	825.00
- Attendance	12/12/2024	3.50	Attend-split with MG	\$330.00	\$	1,155.00
	13/12/2024	4.00	Attend-split with MG	\$330.00	\$	1,320.00
	06/01/2025	2.00	Attend-split with MG	\$330.00	\$	660.00
- Prep. Of Settl Prop.	20/01/2025	1.00	Review Draft #1	\$330.00	\$	330.00
- Prep. Of Settl Prop.	03/02/2025	0.75	Review Draft #2	\$330.00	\$	247.50
- Prep. Of Settl Prop.	06/02/2025	0.25	Review Draft #3	\$330.00	\$	82.50
SUB-TOTAL		20.25				\$6,682.50
HST (13%)						\$868.73
TOTAL						\$7,551.23

CASE EB-2024-0046: Rates: Distribution: Northern Ontario Wires Inc.	COST CLAIM EB-2024-0046 : 1 : Donna Brady	INTERVENOR NAME Brady, Donna; +1 (613) 562-4002 x.121 dbrady@piac.ca	PARTICIPANT CLAIM STATUS Submitted
FILING PARTICIPANT Garner, Mark; +1 (647) 408-4501 markgarner@rogers.com	NEW PARTICIPANT No	NON-FILING PARTICIPANT F. NAME	NON-FILING PARTICIPANT L. NAME
SERVICE PROVIDER TYPE* Consultant	YEAR CALLED TO BAR*	COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE* 31	HOURLY RATE 330
HST RATE CHARGED* 3.94	CV STATUS (FOR CONSULTANT/ANALYST) CV Provided within Previous 24 Months	LAST CV DATE December 06, 2023	OVERRIDE HOURLY RATE No
HST NUMBER 130592405RT0001	HEARINGS Yes	CONSULTATIONS No	DISBURSEMENTS No

HEARINGS

Hearings Hours 40.25	Hearings Subtotal (\$) 13,282.50	Hearings Total Tax (\$) 523.32	Hearings Total (\$) 13,805.82
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<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
DISCOVERY						
Read and Research Application and Evidence		330		3.94		
Preparation of Interrogatories	7.25	330	2,392.50	3.94	94.26	2,486.76
Review Interrogatory Responses	2.25	330	742.50	3.94	29.25	771.75
Technical Conference Preparation		330		3.94		
Technical Conference Attendance		330		3.94		
Technical Conference Follow-up		330		3.94		
Subtotal of DISCOVERY	9.50		3,135.00		123.51	3,258.51
PROCEDURAL						
Preparation of Issues List Submission	6.75	330	2,227.50	3.94	87.76	2,315.26
Attendance at Issues List Conference	5.50	330	1,815.00	3.94	71.51	1,886.51
Preparation for a Confidentiality Request		330		3.94		
Prepare Submissions on Confidentiality		330		3.94		
Preparation of Motion(s) Materials		330		3.94		
Prepare Submissions on the Motion(s)		330		3.94		
Attendance at Hearing on Motion(s)		330		3.94		
Review Procedural Documents		330		3.94		

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
Subtotal of PROCEDURAL	12.25		4,042.50		159.27	4,201.77
INTERVENOR EVIDENCE						
Preparation of Intervenor Evidence		330		3.94		
Interrogatory Responses		330		3.94		
Preparation of Witness(es) for Attendance at Hearing		330		3.94		
Subtotal of INTERVENOR EVIDENCE	0.00		0.00		0.00	0.00
SETTLEMENT CONFERENCE						
Preparation for Settlement Conference	8.50	330	2,805.00	3.94	110.52	2,915.52
Attendance at Settlement Conference	9.75	330	3,217.50	3.94	126.77	3,344.27
Preparation of Settlement Proposal		330		3.94		
Attendance at Presentation to Panel		330		3.94		
Subtotal of SETTLEMENT CONFERENCE	18.25		6,022.50		237.29	6,259.79
WRITTEN ARGUMENT						
Written Submissions		330		3.94		
Subtotal of WRITTEN ARGUMENT	0.00		0.00		0.00	0.00
ORAL ARGUMENT						
Preparation for Oral Hearing		330		3.94		
Attendance at Oral Hearing		330		3.94		
Oral Submissions		330		3.94		
Attendance at Oral Submissions		330		3.94		
Subtotal of ORAL ARGUMENT	0.00		0.00		0.00	0.00
DECISION						
Review Decision	0.25	330	82.50	3.94	3.25	85.75
Review Rate/Accounting Order		330		3.94		
Prepare Submission on Rate Order		330		3.94		
Subtotal of DECISION	0.25		82.50		3.25	85.75
OTHER						
Other Attendance (e.g., Intervenor Conferences)		330		3.94		
Subtotal of OTHER	0.00		0.00		0.00	0.00
TOTAL SERVICE PROVIDER FEES						
Total Service Provider Fees	40.25		13,282.50		523.32	13,805.82

Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
Inv & TimeSheet MG.pdf	Time Docket and Invoice	

Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
Inv & TimeSheet MG.pdf	Time Docket and Invoice	Hearings	