



July 29, 2005

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
26th floor
Toronto, ON M4P 1E4

Re: EB-2005-0317: Cost Allocation Review Request for Late Intervenor Status and Cost Eligibility by BOMA Greater Toronto

Dear Mr. Zych:

This is in response to your letter of June 24, 2005 on this subject. BOMA Greater Toronto has considerable interests in the subject of cost allocation review and hereby requests consideration for involvement with the review process. Recognizing the makeup of existing consumer representatives, we believe it is important to also have the voice of the *medium to large* commercial consumers represented. We are cognizant of the need for cost efficiency in this process and believe the approach proposed here will effectively serve both the needs of the OEB and the public.

1. About BOMA

The Building Owners and Managers Association is an International organization of 19,000 commercial real estate professionals. It is recognized as the leading voice for property owners and managers in North America. BOMA Greater Toronto, with a network of over 670 members, represents the association in the Greater Toronto Area. Our members represent the major commercial building owners and managers in the Greater Toronto Area and throughout Ontario.

BOMA members are typically served under the General Service 50-1000 kW; 1000-5000 kW, and 5000 kW+ rate categories. While Toronto Hydro is the predominant LDC supplier, our members are also customers of all large urban LDCs in Ontario.

BOMA has an active Strategic Energy Committee comprised of members and supported by an expert consultant. This committee develops policy regarding BOMA positions on energy matters. Regular communication is made to the broad membership, and feedback is solicited, through newsletters, seminars and general meetings.

2. BOMA's interest in Cost Allocation Review.

In previous representations to the OEB, BOMA has highlighted the considerable disparity between rates from different LDCs for typical medium and large commercial consumers. We are concerned that these disparities are indicative of improper cost allocation in rate design. We are also concerned about proper rate class categories and seams issues between rate classes.

Overall, our interest is in seeing that costs are fairly and practically allocated, drawing from a basis of accurate information on costs imposed by the respective customer classes. We can provide extensive usage and billing data compiled from our members to support this review, as appropriate.

3. Participation in the Review.

Recognizing the substantial level of effort required for ongoing involvement throughout the process, BOMA Greater Toronto has approached Mr. Randy Aiken of Aiken and Associates, to serve as our representative in the Technical Advisory Meetings.

BOMA Greater Toronto recognizes Mr. Aiken's professional reputation and his considerable experience in previous rate proceedings. We note that Mr. Aiken is also engaged to represent the interest of other consumers, namely the London Property Managers Association. We believe that it is complementary for Mr. Aiken to also carry the views of medium-large commercial consumers, without any conflict to his existing obligations.

BOMA Greater Toronto would then seek to participate directly in the Technical Workshops, and would provide our own written submissions, seeking cost awards according to approved guidelines for this direct participation.

We believe this approach provides a desired efficiency to the process, broadening the spectrum of formally represented consumer interests while avoiding the need for additional attendance at the Technical Advisory meetings.

BOMA Greater Toronto funds its own energy committee operations to a limited degree. This request for funding is to address the incremental workload associated with participating in the proceeding as described.

Thank you for your consideration of this request. Please contact me if you have any questions or require clarification.

Yours truly,



Chuck Stradling
Executive Vice President

c. Mr. R. Aiken, Aiken and Associates