



April 15th, 2008

Giuseppa Bentivegna
Alberta Utilities Commission
Fifth Avenue Place, #400, 425-1st SW
Calgary, Alberta T2P 3L8

Dear Ms. Bentivegna

Re: Comments on Rule 22, Intervener Costs

The ADC offers the following comments for consideration on the review of Rule 22, Rules on Intervener Costs.

In general, the ADC supports the position that the regulatory process needs to be efficient with a careful eye on expenditures. To be efficient, it is key to have intervener groups work together where common positions exist to avoid duplication of effort. It is also important to have quality representation of consumers of all sizes with the goal of fairness being paramount. In the spirit of minimizing costs, rules for cost recovery should be made to encourage a successful negotiated settlement. Where negotiated settlements are unsuccessful, the preference to resolve should be a written process, then lastly an oral hearing if necessary.

Issue 1: Role of the UCA

The ADC is supportive of the UCA's role. Other interveners representing similar groups should first be required to work with the UCA at their own cost to determine if their positions differ. Where they do, we agree that the other group should be entitled to participate in the process. However, before allowing cost recovery, the group should first be required to seek pre-approval by demonstrating the value they intend to bring and how their position differs from the UCA. If through the process, the position of the UCA changes, the other interveners should then have the opportunity to reengage in the process.

Issue 2: Business Interest Rule

The business interest rule should be designed to encourage meaningful participation. Cost recovery should be provided to Industry Associations that are not represented by the UCA and where their membership could be significantly impacted by an application. The caveat being that recovery of costs would be dependent on avoidance of duplicated efforts and value brought to the proceeding.

Issue 3: Budgets

The ADC supports the notion of budgets or some form of communication that outlines where groups are expecting to spend effort in a proceeding. The goal here is to minimize duplication of effort.

Issue 4: Scale of Costs

The scale of costs should be reviewed to reflect current market rates. The application of rates should be structured to encourage early resolution through collaborative processes and or negotiated settlements.

Issue 5: Negotiated Settlements

The ADC supports the idea that cost recovery be available for time spent in negotiated settlements, but effective and meaningful participation needs to be encouraged and rewarded. Perhaps a value rating by the peers in the group which forms part of the consideration for cost recovery amount would be a way to encourage meaningful participation. The AUC should be involved in the process to help facilitate and potentially mediate an acceptable outcome where parties seem unwilling to negotiate on certain points.

Issue 6: Proceedings without Cost Recovery

The ADC could support proceedings without cost recovery where the impact of the outcome does not impact a wide range of customers or does not have a material impact on any one parties costs.

Issue 7: Cost Officer

The ADC would support that the Cost Officer provide timely notification to interveners where duplication of efforts is observed and may impact cost recovery. If the notification timing is late, costs that could have been avoided may have already been incurred.

Thank you for the opportunity to provide comments. We would be happy to meet with the AUC to discuss our views or answer any questions.

Sincerely,



Colette Kearl
Executive Director
Alberta Direct Connect Consumers Association - "ADC"