



April 15, 2008

Alberta Utilities Commission
Fifth Avenue Place
4th Floor, 425 – 1 St SW
Calgary, Alberta
T2P 3L8

Attn: Giuseppa Bentivegna

Dear Ms. Bentivegna,

Re: Rule 22, Rules on Intervener Costs

This letter is in response to the Alberta Utilities Commission Bulletin 2008-01 inviting comments on Rule 22, Rules on Intervener Costs. AltaLink has comments on the two issues set out below.

1. Intervener Groups

Should any group representing persons wanting to intervene in a hearing or other proceeding be required to demonstrate who they represent and how their participation may differ from other similar groups?

AltaLink comment:

Yes. In order to ensure that hearings are efficient for all parties, and to avoid duplication of effort by interveners, it would be appropriate for the AUC to require intervener groups to demonstrate who they represent and how their participation may differ from other similar groups.

2. Scale of Costs

What rates should be set for lawyers and experts? Please provide rationale in support of the proposed rates.

AltaLink comment:

The rates in Scale of Costs should be increased so that they are closer to current market rates. In particular, the rates for senior lawyers and experts are considerably below the market rates in Calgary. Updating the Scale of Costs would ensure that all parties have the opportunity to hire experienced counsel and experts to assist them, which in turn will continue to ensure efficient, well focused hearings.

We have attached a copy of the Scale of Costs for the Ontario Energy Board as one example of costs that are closer to market rates. This Scale of Costs was updated in November 2007 (See attachment: Appendix "A" to the Ontario Energy Board Practice Direction on Cost Awards).

AltaLink thanks the AUC for the opportunity to comment on this Rule.



If you have any questions regarding the foregoing, please contact the undersigned at 267-3450 or Jennifer Hocking, Senior Regulatory Advisor, at 267-4263.

Yours truly,

(original signed by Zora Lazic, SVP)

Zora Lazic
Senior Vice President, Regulatory & Client Services

JH

cc: Indra Maharaj
Manager, Regulatory Projects

Emailed to giuseppa.bentivegna@auc.ab.ca

