
December 21, 2007

Ms. Giuseppa Bentivegna
Alberta Energy and Utilities Board
Law Branch
5th Floor, 640 – 5th Avenue, S.W.
Calgary, Alberta T2P 3G4

Re: 12-10-07 Draft AUC Rules on Intervener Costs

Dear Ms. Bentivegna:

In addition to specific comments contained in the attached document with regards to the draft intervener cost rules, the Office of the Utilities Consumer Advocate (UCA) is providing this additional information to be of assistance to the AUC in the development of its new rules and procedures.

- The UCA will be undertaking comprehensive and primary intervention on behalf of residential, farm and small business consumers in all applicable cases before the AUC.
- The UCA will not be requesting intervener cost recovery for its participation in those proceedings.
- The UCA would recommend that, in order to avoid the duplication of positions before the AUC, and in order to avoid placing parties at risk of disallowance due to duplication of positions taken by the UCA, that the UCA provide its information requests, evidence and arguments in advance of other interveners. This is the model employed before the California Public Utilities Commission with a similar blended representation model. The UCA recommends the AUC incorporate this concept in its hearing processes and rules.
- All intervention budgets for the UCA will require the approval of the UCA Governance Board. As the UCA will not be applying for cost recovery, and as there will already be a responsible authority with regard to UCA expenditures, it is not seen to be necessary for the UCA to undertake detailed budgets for the AUC. However, if it is of assistance, the UCA could provide its actual expenditures to the AUC following each hearing.

Should you have any questions with regard to this matter please contact the undersigned at (780) 644-5476.

Yours truly,

<sent via e-mail>

Ron Henderson
Manager, Regulatory Affairs
Office of the Utilities Consumer Advocate

cc. Mr. Larry Sirman, Chair – UCA Governance Board
Mr. David Gray, Executive Director - UCA