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File: 5356

Sent by Courier and Electronic Mail

January 12, 2011

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervenor Status and Cost Eligibility Request on Behalf of the Ontario Sustainable Energy Association (OSEA)
Renewed Regulatory Framework for Electricity Consultation Initiation
Board File Numbers: EB-2010-0377, EB-2010-0378 and EB-2010-0379**

The Ontario Sustainable Energy Association (OSEA) respectfully requests that it be permitted to intervene late in this matter and that it be found eligible for costs in this proceeding.

Request for Intervenor Status

OSEA seeks intervenor status for the following reasons:

1. It is a province-wide, non-profit organization representing more than 150 members centered on the vision of sustainable energy development. OSEA promotes the view that every Ontarian can be a conserver and generator of sustainable energy. A list of its members can be found at: <http://www.ontario-sea.org>.
2. As a founding member of the Green Energy Act Alliance that helped to shape Ontario's *Green Energy and Green Economy Act*, OSEA played a key role in assisting Ontario to make the transition to a more sustainable energy future and wishes to continue to actively participate in the legal and policy processes that support sustainable energy development.
3. OSEA was also a co-intervenor in the OEB Integrated Power System Plan hearing EB 2007-0707. The OEB accepted its focus in environmental and sustainable energy issues. It is worth pointing out however that OSEA is distinguished from



its other co-intervenors (the Pembina Institute and Green Energy Coalition) in that OSEA seeks to promote sustainability through its focus on renewable energy and other sustainable energy processes in Ontario.

4. Its 75 organizational members also represent thousands of individual ratepayers. Only six of its 75 organizational members are generators¹. All of its members, the thousands of ratepayers and the small number of generators, share a common interest in supporting renewable energy development and sustainable energy processes in Ontario.

Request for Cost Award Eligibility

OSEA seeks funding for the participation of its counsel and expert advisors (Ms. Judy Simon, IndEco Strategic Consulting and Ms. Marion Fraser, Fraser & Company).

OSEA requests that it be determined eligible for a cost award on the following grounds:

1. OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede sustainable development for Ontario. Its membership consists of several non-profit/community organizations that advocate for a variety of interest groups including ratepayers. Further, OSEA's membership includes thousands of individual ratepayers.
2. OSEA's membership does include a small number of generators, a group that is specifically excluded from cost award eligibility, unless special circumstances exist. In this proceeding, generators are directly affected. Investment in the network and rate mitigation policy will impact the ability of renewable energy projects to be added to the grid and to provide green energy to consumers. The rules and procedures created in these proceedings will impact the cost of installing and connecting renewable energy projects. This proceeding will also impact the services provided to generators by distributors and transmitters. In this way, generators are also consumers in this proceeding.
3. OSEA's members, both individuals and organizations, are interested in the development of sustainable energy in Ontario, not simply as generators, but as consumers, individuals and citizens of Ontario. Our members are also concerned about the rate impacts that any new investment in the grid will cause and are

¹ These six have a combined in-service capacity of just over 20 MW with the one single member accounting for 18.5 MW (Sky Power Limited) and a second accounting for 1.6 MW (Schneider Power). Of the other four generators: one is a religious community, another is a non-profit co-operative organization, the third generates electricity for educational and testing purposes and the fourth is a family farm based initiative for a 10Kw solar project. At present, we know that there are 14 other members who are hoping to become generators in the future. It will some time before this happens.



interested in having appropriate ways to measure the performance of these investments to maximize benefits to ratepayers. In this way, OSEA represents the direct interest of consumers.

4. OSEA does not have funds of its own to allocate towards its meaningful participation in this matter.

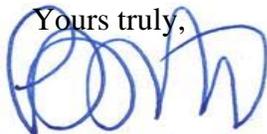
If OSEA is awarded intervenor status and the cost award requested herein, OSEA intends to participate in the stakeholder conference on February 2, 2011.

OSEA requests that further communications with respect to this matter be sent to the following parties:

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Yours truly,


Cherie L. Brant

cc: Mr. Kristopher Stevens, Executive Director, OSEA
Intervenors

Document #: 388913