



Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27<sup>th</sup> Floor  
2300 Yonge St  
Toronto, ON  
M4P 1E4

**Re: Proposed Amendments to the Transmission System Code and the Distribution System Code To Facilitate Regional Planning  
Board File No.: EB-2016-0003**

Dear Ms Walli,

Further to the Board notice dated September 21, 2017 and the Board's *Practice Direction on Cost Awards*, I am writing to request intervenor status and cost award eligibility in relation to the above-mentioned consultation initiative. I believe the changes proposed by the Board could have significant impacts for a wide range of customers who have or could have on-site generation, and may affect waterpower generators in Ontario directly.

**Representation and Experts**

The OWA proposes to retain an expert to assist with preparation of comments on the expected staff report and other eligible activities as appropriate and is therefore requesting cost eligibility for this proceeding.

**Practice Direction and other Funding**

The OWA currently does not have access to other funding to enable its participation in this initiative. In accordance with Section 3 of the Board's *Practice Direction on Cost Awards*, OWA believes that it is eligible for an award of costs as it represents potentially affected customers as well as a public interest relative to the Board's mandate (s.3.03(b)) and OWA members are persons with interests that will be affected by the outcome of the process (2.3.03(c)). OWA is an association that represents waterpower generation and technology providers, who are often customers of transmission, distribution and/or applicants in other related proceedings and has, in the past, brought a joint application to the Board in collaboration with Hydro One. As a result, OWA submits that special circumstances exist to find that it is eligible for a cost award in this process despite the fact that certain of its members may fall within s.3.05(b) of the Practice Direction.

The OWA and its members have a significant interest in this consultation initiative and will take steps to co-ordinate with other generator organizations. On the basis of the foregoing, the PWA respectfully requests that the Board approve its request to participate as an intervenor, and for the related cost eligibility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Norris', with a long horizontal flourish extending to the right.

Paul Norris  
President  
Ontario Waterpower Association