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E-MAIL & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Application of Erie Thames Power Lines Corporation (“Erie Thames”) for Approval of 2018 Distribution Rates (“Application”); TMMC Request for Intervenor Status; Board File No.: EB-2017-0038

1. TMMC’s Interest

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. (“TMMC”) to request that it be granted intervenor status in the above-referenced proceeding.

TMMC owns and operates a car manufacturing plant located in Cambridge, Ontario (the “**Cambridge Plant**”). The Cambridge Plant is connected to the electricity distribution system of Energy+ Inc. (“**Energy+**”). TMMC also owns and operates 9.2 megawatt natural gas-fired combined heat and power generation facility and located at the Cambridge Plant. The generation facility went into service on January 1, 2016.

In its 2019 Cost of Service Application, Energy+ is seeking approval of a standby rate applicable to customers with load displacement generation. TMMC has sought intervenor status in Energy+’s proceedings (EB-2018-0028) in respect of this issue. It appears that Erie Thames, in its application, is also seeking approval of a standby rate. In its June 14, 2018 Decision on Scope of Review (at p.2), the Board determined that “Cost Allocation: Revenue to cost ratios and standby rate proposal” was an issue that should proceed to a full hearing.

Standby rates are the subject of current and on-going OEB consultations which, when concluded, presumably will result in a set of guiding principles, generic methodologies, or both, applicable to all distributors (see EB-2015-0043 and letter from the Board to all distributors of March 29, 2016). In the meantime, the Board is permitting individual distributors, such as Erie Thames and Energy+, to advance utility-specific proposals as part of their rate applications.

Although TMMC is not a customer of Erie Thames, it is nevertheless applying for intervenor status in this proceeding because a determination of the standby rate issue in this proceeding, could serve as a precedent for applications by other distributors, such as Energy+, who are also seeking approval of standby rate proposals. Thus, a determination of the issue in this proceeding could have implications for

load displacement customers, such as TMMC, who are connected to other electricity distribution systems in the province.

2. TMMC's Participation in the Proceeding

It is TMMC's intention to participate fully in the proceeding, with a particular focus on the cost allocation/standby rate issue. At this point, TMMC has no submissions as to the form of hearing.

3. Costs

TMMC does not intend to seek a cost award in this proceeding.

4. Contacts

Communications related to this proceeding should be directed to and/or served upon:

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Yours very truly

Dentons Canada LLP

Original signed Helen T. Newland

Helen T. Newland

HTN/hs

cc: Melody Collis, TMMC
Jo Keaton, TMNA
Graig Pettit, Erie Thames
Scott Stoll, Aird & Berlis