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February 27, 2019

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (OSEA)
Intervention and Cost Eligibility Request re Rate Design for Electricity Commercial
and Industrial Customers
Board File No. EB-2015-0043**

Willms & Shier Environmental Lawyers LLP is counsel for OSEA. OSEA intends to participate in the Board's invitation to comment on the Board's Staff Report to the Board: Rate Design for Commercial and Industrial Customers to Support an Evolving Electricity Sector and seeks cost award eligibility for this consultation initiative. OSEA may retain an expert to assist.

OSEA AND ITS INTEREST IN THE PROCEEDING

OSEA is a public interest organization that works towards a sustainable energy future. This includes ensuring funding and rates that encourage conservation and the incorporation of renewable energy. OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. Its membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA is Ontario's lead advocate and facilitator for sector transformation to a more sustainable energy economy.

OSEA supports an energy system in Ontario that is both ecologically and economically sustainable. OSEA intends to review and comment on Board Staff's recommendations relating to rate design solutions. These will be important to not only electricity distributors but will also

have significant impacts for a wide range of customers, including their abilities to reduce peak electricity costs. In particular, OSEA has an interest in rate design solutions that support adoption of distributed energy resources, energy storage and renewable or sustainable technologies.

NATURE AND SCOPE OF OSEA’S INTENDED PARTICIPATION

OSEA actively participates in Board proceedings and intends to provide meaningful comments on Board Staff’s Report.

COSTS

In accordance with Section 3 of the Board’s *Practice Direction on Cost Awards*, OSEA 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 OSEA members are persons with interests that will be affected by the outcome of the process (s 2.3.03(c)). OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede energy conservation and sustainable energy development for Ontario.

OSEA’s members, both individuals and organizations, are interested in the development of sustainable energy in Ontario as consumers, individuals and citizens of Ontario. OSEA has been awarded costs by the Board in previous hearings, and the Board recognized that OSEA can provide “an important and unique perspective” in EB 2011-0118. OSEA can continue to provide an important and unique perspective in the current consultation initiative. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

REASON FOR LATE SUBMISSION

OSEA recently learned of the Board’s consultation initiative, which delayed this submission. OSEA respectfully requests that the Board consider OSEA’s cost award eligibility in relation to this initiative.

REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

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Yours truly,



Matt Gardner

cc: Dan Goldberger, OSEA
Marion Fraser, Fraser & Company

Document #: 1497845