

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

May 19, 2020

**EB-2020-0133 Consultation on the Deferral Account
Pollution Probe Participation Request**

Dear Ms. Long:

Pollution Probe is in receipt of the notice for the above noted consultation and hereby applies for participation status and requests that it be eligible for the recovery of reasonably incurred costs for its participation.

Pollution Probe represents the direct interests of consumers and an interest and policy perspective relevant to the Board's mandate in this consultation. Recent utility proceedings and operations have been impacted by COVID-19 and the treatment of Accounts and sub-accounts by the Board will require consistent treatment that recognizes that Board decisions have been released for some utility rates and specific projects, while others are still pending.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of the current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

Goals and Objectives

Pollution Probe is a Party to proceedings and agreements that will be impacted by the accounting guidance and policy direction issued by the Board as a result of this consultation. Pollution Probe supports clear symmetrical treatment of cost increases or reductions directly related to the impact of COVID-19, subject to transparent review and approval. Pollution Probe's focus is covered by the key issues identified by the Board for the consultation, more specifically:

- Rules on the operations of the three sub-accounts
- The nature of the costs/revenue to be recorded
- Timing of recovery
- How materiality will be assessed
- Whether any additional revenues or offsetting cost savings need to be considered
- Rate impacts and rate mitigation consideration

Intention to Seek Cost Awards

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, future of natural gas and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible. Pollution Probe has been an active and valuable participant in proceedings before the Ontario Energy Board and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, community and environmental interests in Ontario.

Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

Notice

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy
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Respectfully submitted on behalf of Pollution Probe.



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cc: Richard Carlson, Pollution Probe (via email)