

**IN THE MATTER OF the Notice of Proposal to  
Amend the Distribution System Code**

**Application for Cost Eligibility  
OF THE  
SCHOOL ENERGY COALITION**

1. The School Energy Coalition applies for an order of cost eligibility status in this proceeding.

**General Interest of the Intervenor**

2. The School Energy Coalition is a coalition established to represent the interests of all Ontario publicly-funded schools in matters relating to energy regulation, policy, and management. It is made up of all seven of the major school-related organizations, representing all of the school boards, and all levels of school management, and through them representing the approximately 5000 schools in Ontario.

3. The primary goal of the coalition's member organizations is to promote and enhance public education for the benefit of all students and citizens of Ontario. The School Energy Coalition's mission as intervenor in this matter is to be an advocate on behalf of the publicly-funded school system of the province, and therefore the interests of more than two million elementary and secondary students and more than half a million adult learners.

4. The intervenor's members have a significant interest in the activities of regulated electricity distributors and their affiliates in the province, due to the severe financial implications those activities have on school boards, their students and the people of the province of Ontario. Utility costs are one of the most significant cost pressures facing school boards. The cost of energy to the intervenor's members is currently in excess of \$370 million per annum, and has increased rapidly over the last five years. To produce balanced budgets in the face of ever increasing energy costs, school boards have repeatedly been forced to cut essential programs and services to the detriment of the students and the public of the province of Ontario.

**Issues to be Addressed**

5. The School Energy Coalition is intervening:

- a) to review the Notice of Proposal and provide comments to the Board in accordance with the suggestions set out therein.

### **Counsel/Representative**

6. The School Energy Coalition requests that a copy of all documents filed with the Board by each party to these proceedings be served on the Applicant, and on the Applicant's counsel and case manager as follows:

(a) School Energy Coalition:

**ONTARIO EDUCATION SERVICES CORPORATION**

**c/o Ontario Public School Boards' Association**

439 University Avenue, 18<sup>th</sup> Floor

Toronto, ON M5G 1Y8

Attn: Bob Williams, Co-Ordinator

Phone: 416 340-2540 Fax: 416 340-7571 Email: [bwilliams@opsba.org](mailto:bwilliams@opsba.org)

(b) School Energy Coalition's counsel:

**SHIBLEY RIGHTON LLP**

Barristers and Solicitors

250 University Avenue, Suite 700

Toronto, Ontario, M5H 3E5

Attn:

**Jay Shepherd**

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### **Costs**

7. The School Energy Coalition intends to apply, in accordance with the Board's June 10 letter in the matter, for recovery of its costs reasonably incurred in the course of its intervention in these proceedings.

Respectfully submitted on behalf of the School Energy Coalition this 18<sup>th</sup> day of June, 2009.

**SHIBLEY RIGHTON LLP**

Per:

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John De Vellis