

IN THE MATTER of sections 25.30 and 25.31 of the *Electricity Act, 1998*;

AND IN THE MATTER OF an Application by the Ontario Power Authority for review and approval of its integrated power system plan and approval of its proposed procurement process.

NOTICE OF INTERVENTION
OF THE
SCHOOL ENERGY COALITION

1. The School Energy Coalition applies for intervenor status in this proceeding.

General Interest of the Intervenor

2. The School Energy Coalition (“SEC”) 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 and about two million students in Ontario. The primary goal of these organizations is to promote and enhance public education for the benefit of all students and citizens of Ontario.
3. The SEC’s members have a significant interest in the integrated power system plan (“IPSP”) proposed by the Applicant. The choices made in the IPSP pertaining to electricity supply, transmission, capacity and demand management will have an impact on the adequacy, reliability, and cost of energy to schools.
4. Energy costs are one of the most significant cost pressures facing school boards. The cost of energy services to the SEC’s members is currently in excess of \$370 million, and has increased rapidly over the last five years. To produce balanced budgets in the face of ever increasing utility 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.
5. Ontario school boards have been exploring various options to participate in the electricity commodity markets as a means of managing their high energy costs. The SEC therefore has an interest in the procurement processes proposed by the Applicant for both generation and

conservation and, in particular, in ensuring that those procurement approaches do not limit the ability of school boards to participate in the electricity commodity market as a buyer or seller of energy and/or energy services.

6. School boards have an interest in the adequacy and reliability of electricity supply. As a practical matter, schools cannot remain open if there is no electricity, which disrupts the quality of education students receive. On a broader level, an inadequate and unreliable energy supply leads to higher energy costs.
7. As the voice of two million students in Ontario, the SEC is committed to ensuring that the environment these students live in is a healthy and sustainable one. Children have the right to live and breathe in a clean environment, and clearly the learning process is enhanced or undermined, as the case may be, by society's choices relating to the environment. Furthermore, they will be the ones in the future who have to deal with the effects on the environment due to the choices made today. The cost effectiveness of the IPSP should not be achieved at the expense of the environment. The SEC seeks to ensure that an appropriate balance between economic costs and environmental benefits is obtained.

Issues to be Addressed and Intervenor's Intended Participation

8. The SEC is intervening:
 - a. to review and assess the Applicant's IPSP and its proposed procurement processes as they impact on school boards and other ratepayers; and
 - b. to generally represent the interests of the school boards and their students in this proceeding in all major aspects of the application.
9. The foregoing summary is intended to be illustrative but not exhaustive. The SEC will review the evidence and underlying principles as the record continues to develop, and will advise the parties of any further areas of interest/concern.

The Intervenor's Intended Participation

10. The SEC intends to participate in any pre-hearing procedures, including the issues process, interrogatories or technical conferences, and settlement conferences. The SEC also intends to participate in any oral hearing of this matter, and in written or oral submissions, as well as any other parts of the process that the Ontario Energy Board ("OEB") should order.

Nature of Hearing Requested

11. Given the volume of the Applicant's written pre-filed evidence and the issues raised therein, the SEC believes that an oral hearing is necessary in this proceeding.

Counsel/Representative

12. The SEC requests that a copy of all documents filed with the OEB by each party to this proceeding be served on the SEC, and on the SEC'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, 18th Floor
Toronto, ON M5G 1Y8

Attn: Bob Williams, Co-ordinator
Phone: (416) 340-2540
Fax: (416) 340-7571
Email: bwilliams@opsba.org

- (b) School Energy Coalition's counsel:

SHIBLEY RIGHTON LLP
Barristers and Solicitors
250 University Avenue, Suite 700
Toronto, ON M5H 3E5

Attn: Jay Shepherd
Phone: (416) 214-5224
Fax: (416) 214-5424
Email: jay.shepherd@shibleyrighton.com

and

Attn: Mikaela Cameron
Phone: (416) 214-5244
Fax: (416) 214-5444
Email: mikaela.cameron@shibleyrighton.com

- (c) School Energy Coalition's case manager/consultant:

INSTITUTIONAL ENERGY ANALYSIS, INC.
250 University Avenue, Suite 700
Toronto, ON M5H 3E5

Attn: Corinne Bassett, Conservation Specialist

Phone: (416) 214-5218
Fax: (416) 214-5418
Email: corinne.bassett@ieai.ca

Costs

13. The SEC intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. The SEC has participated in many past electricity and natural gas proceedings in Ontario, including policy and procedural consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.
14. The SEC is eligible for a cost award because it “primarily represents the interests of consumers (e.g. ratepayers) in relation to regulated services”. School boards are one of the largest groups of non-industrial energy consumers in the province, and their energy costs have a direct impact on the education of millions of Ontario children. The formation of the SEC ensured that all representatives of the interests of schools participated jointly in OEB proceedings.
15. The SEC is not ineligible by reason of any of the criteria contained in section 3.05 of the Practice Direction on Cost Awards.

Respectfully submitted on behalf of the School Energy Coalition this 13th day of November, 2007.

SHIBLEY RIGHTON LLP

Per: _____
Jay Shepherd