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Reply To: Thomas Brett
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File No.: 106859

VIA COURIER AND E-MAIL

Kirsten Walli
Ontario Energy Board
2300 Yonge Street
Toronto, Ontario M4P 1E4
boardsec@oeb.gov.on.ca

Dear Ms. Walli:

**Re: Late Intervention Request and Application for Costs in respect of the
Co-ordinated Consultation Proceedings EB-2010-0279, EB-2010-0331
and EB-2010-0332 from the Canadian Energy Efficiency Alliance**

I am writing to request on behalf of Canadian Energy Efficiency Alliance (the "Alliance") late intervention status in these co-ordinated consultative proceedings, and to apply for costs for the Alliance's participation in those proceedings.

We apologize for the lateness of this intervention request.

The Alliance is a broadly based not-for-profit organization. It is the leading non-government, energy efficiency advocate in Canada. The Alliance was established in 1995 to respond to the lack of a co-ordinated multi-stakeholder effort to promote energy efficiency in Canada, leading to enhanced competitiveness and improved environmental protection.

The Alliance works in partnership with manufacturers, utilities, governments, builders, labour and consumer groups, and environmental organizations to facilitate the adoption of energy efficiency measures in Canada. The Alliance is supported through fees and project contributions from members.

Mission: The leading independent voice in Canada to promote and advance energy efficiency and its related benefits to the economy and the environment.

Objectives

To engage with provincial and federal governments to develop and maintain energy efficiency policies, programs, codes, and standards.

To monitor and publicly report on the energy efficiency activities of governments and other organizations.

To assist members in the development, delivery, promotion, and evaluation of their energy efficiency initiatives.

To raise the public profile of energy efficiency and the Alliance, focusing on the benefits of energy efficiency to the economy and environment.

To identify and work with stakeholders on human resource aspects of energy efficiency, including: education, training, qualification and certification.

To expand the capacity of the Alliance and maintain financial sustainability.

These proceedings are the first major review of the Board's regulatory framework for electricity transmitters and distributors in some time, and are of great interest to the Alliance as they will likely have a substantial impact on the future activities of regulated transmitters and distributors.

In order to achieve our 2030 net-zero energy consumption target for the building sector, the Alliance has recognized that, in addition to extensive energy efficiency measures (e.g. to achieve an Energuide building rate of 86), some small scale generation at the building level (behind the meter) and/or at the small community scale is necessary. The Alliance thinks that distributors' network investment plans through the inclusion of smart grid features and otherwise should both reflect and enable the contribution of, and opportunities for, behind the meter and small community based generation investment, and take account of energy efficiency activities at the building and community energy level generally, bearing in mind that conservation is the most cost effective form of meeting energy demand. (EB-2010-0337)

Moreover, these considerations should inform the creation of appropriate performance and efficiency standards, and appropriate incentives for, and effective performance reviews of, transmission and distribution utilities. (EB-2010-0379)

Finally, energy efficiency measures foremost coupled with building and community specific generation, for example, geothermal initiatives (heat pumps), give utilities additional tools, options and approaches to help mitigate rate/bill impacts of network investments. (EB-2010-0378)

The Alliance agrees with the Board that these initiatives are inter-related and are best dealt with by a co-ordinated process.

Accordingly, the Alliance seeks an award of costs in this proceeding pursuant to Section 3.03(a) of the Board's Rules of Practice and Procedure.

The Alliance requests that further communications with respect to this matter be sent to the following parties:



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The Alliance awaits your acceptance of this late intervention and confirmation that the Alliance will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Tom Brett per: [Signature]

Thomas Brett
TB/dd