

June 28, 2011

Ms. Kirsten Walli, Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Hydro One Networks Inc.  
Application for Exemption from Section 6.2.6 & 6.2.7 of Distribution System Code  
Board File Number EB-2011-0118**

The Ontario Sustainable Energy Association (OSEA) respectfully requests that it be permitted to intervene in this matter and that it be found eligible for costs in this proceeding. OSEA also requests an oral hearing.

**Request for Intervenor Status**

OSEA seeks intervenor status for the following reasons:

1. It is a province-wide, non-profit organization representing more than 180 members centered on the vision of sustainable energy development. OSEA promotes the view that every Ontarian can be a conservator and generator of sustainable energy. A list of its members can be found at: <http://www.ontariosea.org>.
2. As a founding member of the Green Energy Act Alliance that helped to shape Ontario's *Green Energy and Green Economy Act*, OSEA played a key role in assisting Ontario to make the transition to a more sustainable energy future and wishes to continue to actively participate in the legal and policy processes that support sustainable energy development.
3. Its 100 organizational members also represent thousands of individual ratepayers. Only six of its 100 organizational members are generators<sup>1</sup>. All of its members, the thousands of ratepayers and the small number of generators, share a common interest in supporting renewable energy development and sustainable energy processes in Ontario.

**Request for Cost Award Eligibility**

OSEA seeks funding for the participation of its counsel and expert advisors (Ms. Judy Simon, and Ms. Marion Fraser).

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<sup>1</sup> These six have a combined in-service capacity of just over 20 MW with the one single member accounting for 18.5 MW (Sky Power Limited) and a second accounting for 1.6 MW (Schneider Power). Of the other four generators: one is a religious community, another is a non-profit co-operative organization, the third generates electricity for educational and testing purposes and the fourth is a family farm based initiative for a 10Kw solar project. At present, we know that there are 14 other members who are hoping to become generators in the future. It will some time before this happens.

OSEA requests that it be determined eligible for a cost award on the following grounds:

1. OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede sustainable development for Ontario. Its membership consists of several non-profit/community organizations that advocate for a variety of interest groups including ratepayers. Further, OSEA's membership includes thousands of individual ratepayers.
2. OSEA's membership does include a small number of generators, a group that is specifically excluded from cost award eligibility, unless special circumstances exist. In this proceeding, generators are directly affected. Investment in the network and rate mitigation policy will impact the ability of renewable energy projects to be added to the grid and to provide green energy to consumers. The rules and procedures created in these proceeding will impact the cost of installing and connecting renewable energy projects. This proceeding will also impact the services provided to generators by distributors and transmitters. In this way, generators are also consumers in this proceeding.
3. OSEA's members, both individuals and organizations, are interested in the development of sustainable energy in Ontario, not simply as generators, but as consumers, individuals and citizens of Ontario. Our members are also concerned about the rate impacts that any new investment in the grid will cause and are interested in having appropriate ways to measure the performance of these investments to maximize benefits to ratepayers. In this way, OSEA represents the direct interest of consumers.
4. OSEA does not have funds of its own to allocate towards its meaningful participation in this matter.

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

Cherie Brant Willms & Shier Environmental Lawyers LLP 4 King Street West, Suite 900 Toronto, ON, M5H1B6 (416) 862-4829 cbrant@willmsshier.com	Judy Simon Judy Simon + Associates 94 Gothic Avenue Toronto, ON M6P 2V9 (416) 876-1372 Judithbsimon@gmail.com	Marion Fraser Fraser & Company 502 – 33 Harbour Square Toronto, ON, M5J 2G2 (416) 941-9729 Marion.fraser@rogers.com
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Yours truly,



Mr. Kristopher Stevens, Executive Director, OSEA  
416-977-4441 ext 5201  
Kristopher@ontario-sea.org