

**ECOLOGY  
OTTAWA**



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2011-08-09

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27 - 2300 Yonge Street  
Toronto, ON M4P 1E4

EB-2011-0054

Dear Ms Walli,

This letter is in reference to Procedural Order 1, which we received at the end of July of this year. I apologize for the delay in returning your correspondence. This is the first time Ecology Ottawa is requesting to participate in a Board hearing and is thus inexperienced with your procedures, and I was away on vacation at the time the letter was received. That is why our application for standing with costs was based on the application of the Energy Probe Research Foundation, which we trust will not mind the comparison.

Like Energy Probe, Ecology Ottawa:

- is a “non-profit environmental and consumer organization which promotes economic efficiency in the use of resources”.
- “will be representing its residential customer supporters in Ontario, which we have some number of thousands, and also representing a broader public interest concern with respect to the overall financial health and operational integrity of our utilities”.
- “is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, (our) ability to participate in proceedings would be very limited”.

When considering just the above issues, the only difference we see between Ecology Ottawa and Energy Probe is our location in Ottawa. We argue that our closer knowledge of Hydro Ottawa's operations and their impact on consumers in Ottawa and Eastern Ontario deserves to be considered by the Board.

Ecology Ottawa does not understand what a "service provider" is in this context, but does not believe it is one as the only service it provides to consumers is representing their interests, which we believe meets the Board's criteria. Ecology Ottawa does not provide any other energy services.

Ecology Ottawa is surprised to hear that it does not "appear to primarily represent a public interest with respect to issues in this case" as it has been representing the interests of consumers with respect to many of the issues in this case since it was founded in 2006.

As such, Ecology Ottawa is ready notably to help the Board determine if:

- Hydro Ottawa's Green Energy Act Plan is appropriate.
- The impact of CDM is appropriately reflected in Hydro Ottawa's load forecast.
- The proposed elimination of the smart meter rate adder and the inclusion of the smart meter costs in the 2012 revenue requirement is appropriate.
- The fixed to variable splits for each class are appropriate.
- The proposed retail transmission service rates are appropriate.

In conclusion, Ecology Ottawa respectfully requests that the Board allow consumers in Ottawa to be represented by an organization in Ottawa with experience and credibility in this field.

Yours truly,

A handwritten signature in blue ink, appearing to read 'GSAUL', with a stylized flourish at the end.

Graham Saul  
Chair, Steering Committee