

Common Voice Northwest

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November 21, 2011

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Renewed Regulatory Framework for Electricity
EB-2010-0377 *Distribution Network Investment Planning*
EB-2011-0043 *Regulatory Framework for Regional
Planning for Electricity Infrastructure*
EB-2011-0004 *Establishment, Implementation and Promotion of a Smart Grid in Ontario*

Intent to Participate

In response to the Ontario Energy Board invitation, dated November 8, 2011, to participate in the consultation process that is being initiated by the Board on the Renewed Regulatory Framework for Electricity ("RRFE"), Common Voice Northwest (CVNW) is requesting standing as an Interested Party in order to participate in each of the following consultation initiatives:

- EB-2010-0377 *Distribution Network Investment Planning*
- EB-2010-0043 *Regulatory Framework for Regional Planning for Electricity Infrastructure*, and
- EB-2011-0004 – *Establishment, Implementation and Promotion of a Smart Grid in Ontario*

Cost Eligibility Status

Common Voice Northwest is also seeking cost eligibility status in each of the three initiatives.

Collaborative Approach in Both Participation and Cost Eligibility

EB-2010-0377

In addition to seeking standing as an Interested Party participating in EB 2010 - 0377 - *Distribution Network Investment Planning* CVNW is also seeking to be granted eligibility for costs related to making its submissions.

CVNW will collaborate with others in the Northwest Region in preparing its submission in EB 2010 - 0377.

There are vast distances, very thin residential population and proportionally very much larger industrial loads in the Northwest Region. These create load and consumption factors as well as reliability factors in the Northwest Region that makes distribution network planning, as well as the related investment planning, uniquely different from similar planning in the other regions of the province, particularly those other regions where 95% on the population live and work.

CVNW seeks recovery of costs for submissions that would not only be related to the direct needs of its own members but also to the needs of isolated industrial employers in one industry communities. The Northwest Region is comprised of many small communities in which local groups, small businesses in particular, are largely dependent on a single industrial employer and on the incomes of the employees of that employer. The interests of the members of CVNW in any small community of a few thousand people are inextricably tied into the success of the single industry employer in that community.

A reliable distribution system, particular to the special needs in the Northwest Region, that is economically efficient and cost-effective, with development paced so as to match required expenditures with fair and reasonable rate adjustments and predictable changes to the elements of customer bills affected by the plans, is in the interests of all in the Region. The interests of everyone in the Northwest Region in reliable power distribution are in concert and not to be differentiated.

EB 2011-0043

CVNW, in addition to seeking standing as an Interested Party in order to become a participate in EB 2011 0043 - *Regulatory Framework for Regional Planning for Electricity Infrastructure* is also seeking to be granted eligibility for costs for work in relation to– EB 2011-0043.

CVNW is aware that NOACC has been granted eligibility for costs for work within the limited scope for eligible submissions set out in the Board's decision. CVNW with the consent of both

NOACC and the Board, will collaborate in preparing a single participant submission in EB 2011 0043. CVNW understands that NOACC is of the same view.

Given the unique characteristics of vast distances, very thin residential population and proportionally very much larger industrial loads in the Northwest Region, and given that Hydro One functions as the local distributor for most of the region, there is a particular need for transparent and coordinated planning on a regional basis between licensed distributors and transmitters.

CVNW seeks recovery of costs in its Application for cost eligibility. The broader scope sought by CVNW would include submissions on behalf of CVNW members in single industry communities. The Northwest Region is comprised of many small communities in which local groups and small businesses are largely dependent on a single industrial employer and the employees of that employer. The interests of all in reliability of power supply are in concert and not to be differentiated.

EB 2011-0004

CVNW, in addition to seeking standing as an Interested Party in order to become a participant in EB 2011-0004 - *Establishment, Implementation and Promotion of a Smart Grid in Ontario*, is also seeking to be granted eligibility for costs for work in relation to– EB 2011-0004. In the event that NOACC in making a parallel Application is also awarded cost eligibility for cost recovery, CVNW, with the consent of both NOACC and the Board, will collaborate in preparing a single participant submission in EB 2011 - 0004. CVNW understands that NOACC is of the same view.

Customer control, power system flexibility and adaptive infrastructure will be important tools in addressing the needs of the members of CVNW. Those tools will need to be fashioned to serve the unique features of the Northwest Region, its vast distances, its very thin residential population and its proportionally very much larger industrial loads.

Again, CVNW seeks a broad scope for recovery of costs in its Application for cost eligibility. The broader scope sought by CVNW would include submissions on behalf of CVNW members in single industry communities. The Northwest Region is comprised of many small communities in which local groups and small businesses are largely dependent on a single industrial employer and the employees of that employer. The interests of all in reliability of power supply are in concert and not to be differentiated

Background

CVNW is a movement toward unified action by the citizens of Northwestern Ontario to chart their own course within the Province and the Country by addressing regional challenges with realistic Northern solutions.

The Northwest Region is a distinct geographic, economic and social space within Ontario. The challenges it faces are different from elsewhere in Ontario and the contributions the Northwest Region makes to the Province are unique. The decisions affecting the Northwest Region are best understood and made by those who live in the Northwest Region and who own, operate or are employed by businesses here in the Northwest Region.

To be heard clearly by the other regions of the Province, Northwestern Ontario operates as consensual union that speaks clearly on common areas interest. This Common Voice includes area business, industry, labour, municipalities, and areas without municipal organization, schools, post secondary institutions, multicultural organizations and development agencies.

The role of Common Voice Northwest is to ensure that, to the best of our ability, and through co-operation with all within the Region, the people of the Northwest become more advantaged than they are today. Common Voice Northwest will identify, promote and develop economic opportunities in and for Northwestern Ontario. It will also enter into a dialogue with all residents and interest groups of the Region to determine those projects that should be undertaken as a priority.

Reliability of power supply is one of the most fundamental needs in the entire Northwest Region. Availability of adequate and secure supply of electricity within the Northwest region requires regional planning based on a sound knowledge of the needs and challenges unique to the Northwest Region.

Common Voice Northwest has a track record of engaging the expertise of regional leaders within identified industries. These leaders have formed, for example, the Energy Task Force to indentify issues and create action plans for the Northwest Region as a whole.

Membership

CVNW is a not for profit organization made up of the broad leadership of the Northwest. It includes business representatives (from NOACC) but also includes organized labour (including the Thunder Bay District Labour Council & CEP), post secondary education (LU and Confederation College), school boards (Northern Education Leaders), multicultural associations, Townships without Municipal Organization (TWOMO) and cities (NOMA), Northwestern Ontario Development Network (observer), North of Superior Workforce Planning Board. We also keep the three Treaty Organizations informed of our activities (NAN, Treaty 3 and Robinson Superior).

Objects

CVNW is a corporation, duly incorporated in the Province of Ontario with the following objects:

The establishment and operation of an organization for the following purposes:

- a) To provide a forum for the consideration of matters of common interest to the citizens of Northwestern Ontario;
- b) To bring interested parties together to promote and advance the interests of the citizens of Northwestern Ontario;
- c) To co-ordinate and communicate a common message regarding matters where the rights and resources of people in Northwestern Ontario are affected;
- d) To provide leadership on the common issues affecting all people in Northwestern Ontario; and;
- e) For such other complimentary purposes not inconsistent with these objects.

Cost Awards

CVNW seeks designation as a person, under Section 30 of the *Ontario Energy Board Act, 1998*, eligible to receive costs. The basis for the designation would be the representative nature of the CVNW in the Northwest Region itself and the indicated collaboration that the CVNW will continue to pursue with other Interested Parties representing the interests of the Northwest Region.

CVNW in combination with Northwestern Ontario Associated Chambers of Commerce in particular, represents the direct interest of ratepayers, especially the local groups and small businesses, throughout the Northwest Region. Those ratepayers are often dependent for their livelihood on a single industrial employer in a town. In many other cases they depend also on the robust mineral exploration programs now operating in the Northwest Region. The development of a reliable electricity system in the Northwest Region is essential for the viability of those industrial plants, for advanced mineral exploration, value added forest industries and certainly for the construction and operation of any mine that reaches production. A reliable and affordable supply of electricity is a necessity for economic well-being of the entire region.

Adequate supply of energy is also essential for an appropriate standard of living in the municipal and First Nation communities throughout the Northwest Region.

CVNW represents a public interest in seeking to ensure the adequacy and security of electricity supply for both the ratepayers in the Northwest Region and the industries that employ them.

Representing CVNW:

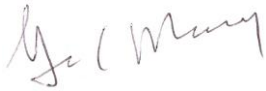
For purposes of Notice:

- Dr. George Macey, President, gmacey@shaw.ca; and
- Mr. Iain Angus, Executive Director, iangus@thunderbay.ca

Please contact the undersigned or Mr. Iain Angus should further information or clarification be required.

Respectfully submitted,

Yours truly

A handwritten signature in dark ink, appearing to read "George Macey", written in a cursive style.

George Macey
Chair