

IN THE MATTER OF the *Ontario Energy Board Act, 1998, S.O. 1998, c.O.15, Sch. B;*

AND IN THE MATTER OF the Board's consultation with respect to Customer Service, Rate Classification, and Non-Payment Risk.

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 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 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 2 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 intervenor's members have a significant interest in the activities of regulated utilities and their affiliates in the province, due to the severe financial implications those activities have on school boards, their students and the people of the province of Ontario. Utility costs are one of the most significant cost pressures facing school boards. The cost of energy services to the intervenor'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.
4. All schools in the province will be impacted by changes in the rates of regulated utilities.

Issues to be Addressed

5. The School Energy Coalition is intervening:

- a. To review and comment on the Board Staff Paper (the “Paper”);
 - b. To participate, to the fullest extent possible, in any working groups and other consultation activities carried on by and on behalf of the Board;
 - c. To consider the impact of any proposed changes on the rates to be paid by schools in the province, and in particular the rules under which the rate schedules applied to schools will be selected and changed from time to time; and
 - d. Generally to represent the interests of the school boards and their students in this proceeding in all material aspects of the process.
6. The foregoing summary is intended to be illustrative but not exhaustive. The School Energy Coalition will review the evidence and the underlying principles as the record continues to develop, and will advise parties of any further areas of interest/concern.

The Intervenor's Intended Participation

7. The School Energy Coalition intends to participate by way of the provision of comments on the Paper. If additional steps in this consultation arise, the School Energy Coalition would generally like to participate if it is in a position to add value to the process. The extent of the School Energy Coalition's involvement will, as in all rate proceedings and policy processes, evolve during the proceeding as the materiality of particular issues becomes clearer.

Counsel/Representative

8. The School Energy Coalition requests that a copy of all documents filed with the Board by each party to this proceeding be served on the Applicant, and on the Applicant'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, Ontario, M5H 3E5

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

Costs

9. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. The School Energy Coalition has participated in many past natural gas and electricity proceedings in Ontario, including the Natural Gas Forum, 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.
10. The School Energy Coalition 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 School Energy Coalition ensured that all representatives of the interests of schools participated jointly in OEB proceedings.
11. The School Energy Coalition 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 26th day of March, 2008.

SHIBLEY RIGHTON LLP

Per: _____
Jay Shepherd