Common Voice Northwest

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May 29, 2012

VIA MAIL AND EMAIL

Ontario Energy Board 2300 Yonge Street Suite 700 Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary (Boardsec@ontarioenergyboard.ca)

Notice of Intent to Participate by Common Voice Northwest (CVNW)

RE: POLICY REVIEW OF MICRO-EMBEDDED GENERATION CONNECTION ISSUES (EB-2012-0246)

Intent to Participate

In response to the Ontario Energy Board invitation, dated May 15, 2012, to participate in the consultation process that is being initiated by the Board regarding Policy Review of Micro-Embedded Generation Connection Issues (EB-2012-0246), Common Voice Northwest (CVNW) is requesting standing as an Interested Party.

Background

The Common Voice Northwest Initiative 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.

Northwestern Ontario is a distinct geographic, economic and social space within Canada. The challenges it faces are as different and the contributions it makes to the Province and Country are unique. The complex decisions affecting the Northwest are best understood and made by those who live here.

To be heard clearly by the other regions of the Province and Country, Northwestern Ontario must operate as consensual union that speaks clearly on common areas interest. This Common Voice includes area business, industry, labour, municipalities, 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 its ability, and through co-operation with all of its partners, 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.

Its Board of Directors are appointed by the member organizations with their Executive Committee elected annually by the Directors.

Common Voice Northwest has engaged the expertise of regional leaders within identified industries and challenged areas. These leaders have formed into Task Forces or Regional Committees to identify the issues and create action plans:

Agriculture Task Force: Provides region wide leadership for the development of our agricultural industry.

Transportation Task Force: Focus on the access and modes needed for a growing economy.

Mining Task Force: Providing advice to foster development and sustainability in the

region's mining sector.

Tourism Northwest: Developing and fostering a Northwestern Ontario tourism strategy which addresses key issues, including planning, policy and product development.

Energy Task Force: Examining the viability of developing a regional energy authority.

Regional Enhancement Committee: Provides region wide leadership for community and labour adjustment.

Policy Research Institute: Would serve as an arm's length source of policy advice to regional leaders and a repository of knowledge and data on the region.

CVNW is a not for profit organization made up of the broad leadership of the Northwest. It includes Municipal and Business representatives (from NOMA and 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), 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).

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.

CVNW's Substantial Interest

CVNW intends to build on its earlier participation in the Board's review of the Integrated Power System Plan (EB-2007-0707), it's comments on the draft Supply Mix Directive and, most recently, on two of the consultation initiatives directed to the Board's Renewed Regulatory Framework for Electricity; namely, Regional Planning on Electrical Infrastructure (EB-2011-0043), and. Developing Guidance for the Implementation of a Smart Grid in Ontario (EB-2011-0004). CVNW has a substantial interest in this consultation proceeding because:

- 1. Members of CVNW have recent experience with micro-embedded generation connections.
- CVNW represents member business, industry, labour, municipalities, and areas without municipal organization, schools, post secondary institutions, multicultural organizations and development agencies businesses and community groups throughout the Northwest Region;

- 3. CVNW understands and can speak to the direct business and social interests of their members in the Northwest Region; and
- 4. through the Energy Task Force (ETF), CVNW has joined in the creation of a regional research committee of interested and experienced individuals who by living and working in the northwest are keenly aware of the geographical and technical issues relating to electricity generation and transmission/distributions in the region.

CVNW will be able to provide valuable insight into not only issues related to microembedded generation connections but also to environmental and other social imperatives, including but not limited to social imperatives that are geographical, economic and commercial.

CVNW also has an interest in the connection of renewable energy generation facilities in the Northwest Region.

Co-operation

CVNW intends to join with other Interested Parties in the Northwest Region, namely:

1. NOACC, the association of Chambers of Commerce throughout the Northwest Region; NOACC will also be seeking status as an interested Party;

- 2. NOMA, the association of the municipalities in the Northwest Region; NOMA will also be seeking status as an Interested Party; and
- 3. in particular, the City of Thunder Bay, regional hub of the Northwest, the largest City (population 113,000), and site of the other of the two large thermal generating stations in the Northwest Region; the City of Thunder Bay will also be seeking status as an Interested Party.

NOMA, NOACC, CVNW and the City of Thunder Bay have agreed among themselves to co-operate and have, therefore, authorized Weiler, Maloney, Nelson, who are counsel, in this instance, for the City of Thunder Bay, to make submissions in the common interests of all of them.

In addition, CVNW and the Nishnawbe-Aski Nation (NAN) are active in seeking out areas where they have similar interests. Weiler, Maloney, Nelson, on the one hand, as counsel in this instance for the City of Thunder Bay and designated spokespersons for NOMA and Douglas Cunningham, on the other hand, counsel for Nishnawbe-Aski Nation co-operated with one another in the EB-2007-0707 hearings on the IPSP and propose to continue the sharing of information and aligning strategies for submissions that

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.

The majority of CVNW's members are not ineligible by reason of any of the criteria contained in section 3.05 of the *Practice Direction on Cost Awards* and efficiency gained by the collaborative representation in the Proceeding should allow for costs to be granted given the diversity of membership.

CVNW in combination with Northwestern Ontario Associated Chambers of Commerce in particular represents the direct interest of ratepayers, especially the small businesses, throughout the Northwest Region. The process to connect micro-embedded generation within their communities impacts those ratepayers whose livelihood depends on a single industrial employer in a town. A reliable and affordable supply of electricity is a necessity for economic wellbeing of the entire region.

CVNW represents a public interest in seeking to ensure the process of connecting micro-embedded generation positively impacts businesses in the Northwest Region and the industries that they supply with goods and services.

Representing CVNW:

For purposes of Notice:

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

Spokespersons for CVNW:

 John A. Cyr, C.S. (Corporate and Commercial Law), Partner in the firm of Weiler, Maloney, Nelson (called to the Bar in 1980, licenced by the Law Society of Upper Canada to practice law in Ontario);

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

Respectfully submitted,

George Macey

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President