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October 10, 2012

BY EMAIL & BY COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2012-0383

**Consultation – Review of Cost Allocation Policy for Unmetered Loads
Energy Probe – Notice of Interest in Participation**

Pursuant to the Invitation from the Board, dated October 1, 2012, describing the Board's consultation process and the Board's intention to establish an Unmetered Loads Working Group focused on providing support to Board staff and the Staff's consultant, Energy Probe Research Foundation (Energy Probe) is hereby providing its Notice of Interest in Participation in the EB-2012-0383 consultation for the Board's consideration. Energy Probe wishes to nominate Dr. Roger Higgin for membership in the Unmetered Loads Working Group, representing residential ratepayers.

A request for cost eligibility with respect to participation by Energy Probe is enclosed.

Should you have any questions or require additional information, please contact me.

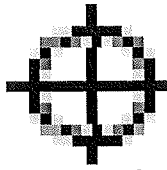
Yours truly,

David S. MacIntosh
Case Manager

cc: Lawrence Schwartz, Economic Consultant to Energy Probe (By email)
Roger Higgin, Consultant to Energy Probe (By email)

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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e-mail : spainc@rogers.com : rhiggin@rogers.blackberry.net
Principal: Roger Higgin PhD, MBA, P.Eng.

Roger M.R. Higgin

Roger Higgin has over 30 years of senior executive experience in the energy and environment sectors in both the public and private sectors.. His recent appointments include regulation of gas and electric utilities with the Ontario Energy Board. His other executive positions include COO in a high-tech firm, CEO in natural gas R&D, Assistant Deputy Minister of Energy Ontario Government, Deputy Commissioner of Environmental Services City of Toronto.

Working as an Energy Regulation Consultant since 2000, he combines his policy, strategic business planning and regulatory experience in his consulting work

CONSULTING EXPERIENCE

Energy Regulation

Provision of consulting and advisory services and regulatory intervention support for Electricity and Gas Regulatory Proceedings

For Energy Probe Research Foundation, 2011 to Present

In Association with Econalysis Consulting Services, 2000 to Present

Employment History

Ontario Energy Board

Board Member 1996 to 2000 (Retired June 2000)

- Regulation of gas and electric utilities in Ontario. Holding proceedings, writing and rendering Decisions and Orders. Scope included facilities, rates, gas cost and generic proceedings. Examples are rates for Enbridge Consumers Gas and Union Gas, PBR plan for Enbridge Consumers Gas, standard supply service for electricity distributors, revenue requirement and transmission rates for Ontario Hydro Services Company (now Hydro One).

Unisearch Associates Inc.**General Manager and Chief Operating Officer 1995 to 1996**

- Responsible for Business Planning, Reorganization, Refinancing and Restructuring of \$2 million high technology environmental instrumentation and service growth company. Establishment of marketing, production, financial management and securing new bank and equity financing. Strategic & Distribution alliances.

Gas Technology Canada and CGRI**President and Chief Executive Officer 1992 to 1995**

- On behalf of Canadian Natural Gas Distribution Sector, operated \$8 million Natural Gas Research and Development program including Canadian Gas Research Institute Laboratory and the Gas Technology Canada technology development investment portfolio.

Toronto Department of Public Works and the Environment**Deputy Commissioner Environmental Services Division****1991 to 1992**

- Responsible for new Environmental Services Division with 600 staff dealing with waste management, air and water quality, transportation systems management, infrastructure planning and development, Office of Energy Efficiency, departmental IT planning and capital budgeting.

Ontario Energy Board**Board Member 1988 to 1991**

- Regulatory/Administrative Commissioner. Chairing Public Hearings-Electric & Gas Utilities. Review of Ontario Hydro Rates and Capital Plans.
- Writing Decisions and Orders.
- Representing Board at meetings & conferences.

Ministry of Energy**Assistant Deputy Minister- Programs & Technology Division****1984 to 1988**

- Staff complement 74, annual budget - \$35 million.
- Input to Policy and Strategy on all aspects of Energy Supply and Demand
- Allocation of over 80% of the Ministry's budget to Conservation and Renewable Energy program priorities.
- Organizational design and organizational development in the Division.
- Federal/Provincial relations. Representing the Ministry at numerous public events involving speaking engagements, TV and radio.

Ontario Energy Ventures
President 1986 to 1988

Ontario Ministry of Energy
Executive Coordinator 1980 to 1984

Ontario Ministry of Energy
Senior Advisor 1974 to 1980

Ontario Ministry of Environment
1973 to 1974 Branch Head

Ontario Ministry of Environment
1971 to 1973 District Engineer

1970 to 1971-Consulting Engineer (Self-Employed)

1968 to 1970 Univ. of Toronto Post-graduate Research Fellow and Lecturer

Professional Affiliations

Professional Engineers of Ontario

Education

Masters of Business Administration

University of Toronto, Faculty of Management Studies, Dean's List 1986

Ph.D.

Fuel Science and Applied Chemistry, University of Leeds, England, 1968.

Thesis: "Shock Tube Ignition of Hydrocarbon Fuels" - high speed chemical reactions and computer simulation of reactions.

B.Sc. with 1st Class Honours

Fuel Science and Combustion Engineering, University of Leeds, England, 1965.

Majors: Heat Transfer, Chemical Reactions, Coal, Oil and Gas Production and Utilization.

EB-2012-0383

Ontario Energy Board

**Review of Cost Allocation Policy
for
Unmetered Loads**

Energy Probe Research Foundation

◆Request for Funding◆

October 10, 2012

Board's Proposed Consultation Process – Request for Funding

i) Statement of Interest

Energy Probe Research Foundation (Energy Probe) is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe 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. Energy Probe will be participating in developing public policy which the Foundation believes to be in the public interest.

The Foundation, one of Canada's largest environmental policy organizations and Canada's largest energy policy organization, has over 30,000 supporters, half of them in Ontario, of which most have tangibly expressed interest in energy issues. Energy Probe also has a strong consumer focus and is frequently acknowledged in the media as a consumer watchdog. Energy Probe participates in conferences and regulatory forums on energy issues which it believes to be in the public interest. In this instance, Energy Probe submits that it has met the Board's cost eligibility criteria under section 3.03 (a) of the *Practice Direction on Cost Awards*.

Many Energy Probe supporters receive information updates. Energy Probe frequently has direct communication with the public through interviews with the media, communications on the Internet, public speaking, and direct mail communication with its supporters.

Energy Probe has a history of representing the interests of many Ontarians who are not financial supporters, and receives active feedback on its initiatives through public and media interaction.

Energy Probe has appeared before the Board for over 30 years, during which time it has been noted for its cooperative spirit, its often-unique perspective, and its contribution to the development of fair and reasonable rates for both individual consumers and commercial/ industrial purchasers of natural gas and electricity. Its approach has been to look beyond annual cost minimization to consider what would be best for the marketplace in the long term.

Energy Probe then, is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of funding assistance, its participation in the consultation initiatives of the Ontario Energy Board, and its ability to produce policy position papers, would be quite limited as well.

Members of Energy Probe's team regularly attend meetings of its Board of Directors, making presentations, providing written summaries of activities, answering the questions of Board Members, and receiving their input.

In addition, Energy Probe reports its regulatory priorities to supporters by direct mail and receives both financial support and comments in response from those supporters.

Energy Probe has a long and unique record of advocating measures designed to lower utility risk, specifically for the purpose of reducing the cost of capital over the long term. Measures of this kind that Energy Probe has pursued include rate rebalancing to stabilize utility income expectations, even in the event of declining volumes, and also measures that reduce utility risk related to commodity costs.

ii) Energy Probe's Participation

Energy Probe intends to fully participate in all of the phases of the discussions, including but not limited to attendance at the Unmetered Loads Working Group and the submission of written comments as requested by the Board.

Energy Probe would like to remind the Board that in prior Board processes in which it has expressed its interest, it has participated well beyond minimum requirements.

iii) Other Sources of Funding

Energy Probe will access funding from general donations from its supporters to make up any shortfall should it exceed the cost allowances of the Board. Energy Probe relies on volunteers to be able to support its regulatory and other work, including a volunteer Board of Directors.

iv) Energy Probe's Advisory Team

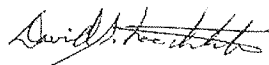
Energy Probe will be assisted by the following advisory team, to whom communications concerning this process should be directed:

Roger Higgin
Sustainable Planning Associates Inc.
15 Malabar Place
Toronto ON M5B 1A4
Tel: 416 391-0738
Email: Roger Higgin <spainc@rogers.com>

AND

David MacIntosh
c/o Energy Probe
225 Brunswick Ave.
Toronto ON M5S 2M6
Tel: 416 964-9223 Ext. 235
Fax: 416 964-8239
Email: DavidMacIntosh@nextcity.com

Respectfully submitted at Toronto, Ontario this 10th day of October 12.



David S. MacIntosh
Case Manager