

Direct Dial: (416) 862-4830
File: 5356

By Email and RESS Filing

June 14, 2013

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervenor Status and Cost Eligibility Request on behalf of the Ontario Sustainable Energy Association (OSEA)
Proposal to Amend the Licence of the Ontario Power Authority
Board File No. EB-2013-0192**

The Ontario Sustainable Energy Association ("OSEA") respectfully requests that it be permitted to intervene in this matter and that it be found eligible for costs in this proceeding.

Request for Intervenor Status

OSEA seeks intervenor status for the following reasons:

- ♦ It is a province-wide, non-profit organization representing approximately 200 members centered on the vision of sustainable energy development. OSEA promotes the view that every Ontarian can be a conserver and generator of sustainable energy. A list of its members can be found at: <http://www.ontario-sea.org>.
- ♦ As a founding member of the Green Energy Act Alliance, OSEA played a key role in assisting Ontario to make the transition to a more sustainable energy future. OSEA wishes to continue to actively participate in the legal and policy processes that support sustainable energy development.



- ♦ OSEA's members share a common interest in supporting and promoting sustainable energy processes in Ontario. OSEA advances a vision of small scale and local community based power generation among other sustainable energy practices. OSEA promotes the combination of conservation and generation with the goal of creating a sustainable energy future for Ontario.

To OSEA, sustainable energy is

the effective and efficient production and use of energy from various distributed sources matched in scale and quality to the end use. Proponents of sustainable energy recognize that energy is a means to an end, not an end itself. Sustainable energy is about producing and using energy in a way that meets our needs and improves the quality of our lives while also ensuring that the ecological system that sustains us, our economy and society is healthy and capable of supporting future generations at a similar level long into the future.

Sustainable energy includes conservation, energy efficiency, demand management, smart buildings, thermal and electrical storage, smart-grids, district energy networks, combined heat and power, waste energy capture and renewable heat and electricity from biomass, wind, water geothermal and solar energy.

- ♦ For OSEA and its membership, a sustainable energy future is a public interest for all Ontarians. This includes a vision of a green energy system for Ontario, and how to best provide services to Ontarians.
- ♦ OSEA has been granted intervenor status by the Ontario Energy Board in similar hearings, such as in the Integrated Power System Plan hearing EB 2007-0707 and the Renewed Regulatory Framework for Electricity Consultation hearings, EB-2010-0377, EB-2010-0378, EB-2010-0379, EB-2011-0043 and EB-2011-0004.

Request for Cost Award Eligibility

OSEA seeks funding for the participation of its counsel and expert advisor (Ms. Marion Fraser, Fraser & Company).

OSEA requests that it be determined eligible for a cost award on the following grounds:

1. OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede energy conservation and sustainable energy development for Ontario. Its membership consists of several non-profit/community organizations that advocate for a variety of interest groups including ratepayers. Further, OSEA's membership includes thousands of individual ratepayers.



2. OSEA's members, both individuals and organizations, are interested in the development of sustainable energy in Ontario as consumers, individuals and citizens of Ontario.
3. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies. OSEA is not simply an association for energy generators.
4. OSEA has been awarded costs by the Board in similar hearings. OSEA was awarded costs as an intervenor in the Application by Hydro One Networks Inc. for a Six Month Exemption from the Timelines to Connection Micro-embedded Generators hearing EB 2011-0118, and in the OEB Renewed Regulatory Framework for Electricity Consultation hearings EB-2010-0377, EB-2010-0378, and EB-2010-0379. In awarding costs to OSEA, the OEB has recognized that OSEA provided "an important and unique perspective in the matter." OSEA can continue to provide an important and unique perspective in the current hearing.
5. OSEA does not have funds of its own to allocate towards its meaningful participation in this matter.

If OSEA is awarded intervenor status and the cost award requested herein, OSEA intends to participate in the consultation process to provide input into the proposed amendments to the licence of the Ontario Power Authority ("OPA") which address the OPA's obligations in the regional planning process for Ontario.

OSEA requests that further communications with respect to this matter be sent to the following parties:

Joanna Vince
Willms & Shier Environmental Lawyers LLP
4 King Street West, Suite 900
Toronto, ON,
M5H1B6
(416) 862-4830
jvince@willmsshier.com

Marion Fraser
Fraser & Company
502 – 33 Harbour Square
Toronto, ON,
M5J 2G2
(416) 941-9729
Marion.fraser@rogers.com

Yours truly,

Joanna Vince

cc: Mr. Kristopher Stevens, Executive Director, OSEA