



Hamilton

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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
Attn: Ms. Kirsten Walli
Board Secretary
Tel: 1-888-632-6273 (toll free)
Fax: 416-440-7656
E-mail: BoardSec@ontarioenergyboard.ca

Re: EB-2013-0416

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

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2015.

NOTICE OF INTERVENTION OF THE CITY OF HAMILTON

The City of Hamilton applies for intervenor status in this proceeding.

Interest of the Intervenor

This will confirm that the City wishes to intervene in the above hearing, since the outcome of these proceedings will have a direct effect on the City. The City is rate-payer under the provision of street lighting. This rate increase is significant for the street light rate class and will negatively impact the City's operating budgets, and by extension our residents. The extent of that impact will be determined after these proceedings are more advanced.

I have received instruction to submit this notice of intention to intervene, without sufficient time to allow for consultation with the various stakeholder groups within the City, to obtain the necessary Committee or Council direction or approval to intervene in this matter, or, to obtain outside legal expertise.

I am therefore requesting that the City be granted Intervenor Status with respect to the above matter, pending confirmation of the appropriate level of the City's participation in these proceeding.

The City of Hamilton is a municipality that is served by two electric utilities, with Hydro One Networks Inc. being one of them. Hamilton has annual electricity costs over \$25 million and actively pursues energy efficiency, renewable energy and other cost effective methods to best manage or reduce those ongoing costs.

To produce balanced budgets in the face of ever increasing utility costs, municipalities have repeatedly been challenged to maintain or improve on essential programs and services with existing budgets. One of the most significant utility budget pressures municipalities have faced in recent years is the dramatic price increases for street lighting rates.

In order to address this issue and actively attempt to be part of the solution the City of Hamilton participated on an Ontario Energy Board (OEB) led Unmetered Load Working Group. This group included other municipal, utility and private sector representation. One of the items stressed that it was not

recommended to narrow the range of revenue to cost ratios for the unmetered loads customer classes. HONI clearly is seeking to increase its revenue to cost ratios, but is doing so with an already overstressed street lighting rate category.

Issues of Concern

The intended participation by the City of Hamilton will focus on:

1. The proposed methodology used for setting rates for the period 2015-2019;
2. The cost allocation and rate design factors proposed for the collection of the revenue requirement as it relates to street lighting;
3. Generally to represent the interests of municipalities in this process.

Intended Participation

The City of Hamilton intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences.

Counsel/Advisor

The City of Hamilton requests that a copy of all documents filed with the Board by each party to this proceeding be provided to both the City of Hamilton and its advisor (yet to be selected).

Costs

The City of Hamilton intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter.

Written Evidence

In accordance with Rule 23.03(c) of the OEB's Rules of Practice and Procedure please be advised that the City requests that it be provided with copies of all the written evidence.

Documents

The City requests that, in addition to electronic copies one hard copy of all documents filed with the Board by each party to this proceeding be provided to:

Gord McGuire O.L.S. B.Sc.
77 James Street North, Suite 320
Hamilton, Ontario
L8R 2K3

Submitted on behalf of the City of Hamilton this 14th day of February, 2014.

Original signed by
Gord McGuire

Regards,

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Engineering Services | Public Works Department
City of Hamilton