



September 12, 2014

via email - signed original to follow by courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: Toronto Hydro-Electric System Limited 2015-2019 Distribution Rates
(EB-2014-0116) - Notice of Intervention**

Dear Ms. Walli,

On September 2, 2014, the Ontario Energy Board ("OEB") issued a notice concerning an application filed by Toronto Hydro-Electric System Limited ("THESL") for approval of 2015-2019 distribution rates. In accordance with the OEB's notice, the Sustainable Infrastructure Alliance of Ontario (the "SIA") applies for intervenor status in this proceeding.

The SIA is a public interest group whose mission is to advocate for sustainable, prudent, cost effective, and equitably financed investment in public infrastructure. Our membership consists of citizens and ratepayers of varying backgrounds concerned with the future reliability and sustainability of infrastructure in Ontario. While our interests extend beyond the energy industry, a majority of our efforts are directed specifically towards the operations of gas and electric utilities. Through discussion and participation in public forums, the SIA advocates for policies that will ensure reliable and financially sustainable infrastructure for current and future generations. We are predominantly located in the GTA area, but our involvement extends to communities throughout Ontario.

The SIA is currently a registered intervenor in both Hydro One's and Horizon Corporation's 2015-2019 Distribution Rate Application proceedings. The SIA's intervention in this rate proceeding (pertaining to a similar application covering comparable issues and the same rate period) is motivated by largely similar concerns. However, and more notably, given that the majority of the SIA's membership resides within THESL's service territory, the SIA's intervention in this proceeding is of particular importance to its interests and mandate.

Members of the SIA within THESL's service territory are directly affected by a potential disruption to their power supply, and accordingly are interested in ensuring that they are provided with both a reliable and affordable supply of electricity. The flash floods in July 2013 and the ice storm outages in December 2013 are two particularly high-impact events to have occurred in the past year, and the SIA believes that prudent investment and efficient utility management are among the primary considerations in mitigating such events. Through its intervention in this proceeding, the SIA hopes to assist the OEB by exploring appropriate, cost effective, equitably financed, and sustainable investments by THESL in its distribution infrastructure.

The SIA expects that its intervention in this proceeding will focus on THESL's capital investment plans, a few select issues concerning prudent and efficient electric utility management (particularly as it relates to cost effectiveness and cost efficiency) as well as system reliability and disaster preparedness. The SIA will endeavour to be particularly sensitive and focussed in the areas it addresses in order to avoid any unnecessary duplication of topic areas already covered by other intervening parties.

The SIA intends to apply for recovery of its reasonably incurred costs in the course of its intervention in this proceeding and believes that as a public interest group representing the direct interests of customers of THESL and citizens living within THESL's service territory, it meets the eligibility criteria set out in the OEB's Rules of Practice and Procedure and Practice Direction on Cost Awards. The SIA is not ineligible for cost awards by reason of any of the criteria contained in section 3.05 of the Practice Direction on Cost Awards.

Please direct all correspondence to Mr. Dionisio Rivera, who has been retained as the SIA's consultant in this proceeding. We request only electronic copies of all relevant materials:

Dionisio Rivera
1013-15 Baif Blvd.
Richmond Hill, ON
L4C 5N7
Tel: 416-770-4937
dionisio.rivera@live.com

The SIA appreciates the opportunity to voice its concerns, and looks forward to aiding the OEB in ensuring that THESL's expenditures and investments in its infrastructure are prudent and effective in meeting the needs of its ratepayers.

Sincerely,

[original signed by]

Robert Sutton
Director, Sustainable Infrastructure Alliance of Ontario