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November 14, 2014

## **RESS, E-MAIL & COURIER**

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> Floor, Box 2319 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re:

Application of Cambridge and North Dumfries Hydro Inc. for

2015 Distribution Rates;

Request for Intervenor Status; Board File No.: EB-2014-0060

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. ("TMMC") to request that it be granted intervenor status in the above-referenced proceeding. TMMC owns and operates a car manufacturing plant located in Cambridge, Ontario (the "Cambridge Plant"). The Cambridge Plant is connected to the electricity distribution system of Cambridge and North Dumfries Hydro Inc. ("CND") and TMMC is a Large Use Service customer of CND.

For over two years, TMMC has been working with CND's Energy Efficiency Department, in conjunction with the Ontario Power Authority, on the development of a natural gas-fired combined heat and power generation facility ("**Generation Facility**") that will be owned and operated by TMMC and located at the Cambridge Plant. The Generation Facility is scheduled to be in service by December 31, 2015.

The Generation Facility is the "Load Displacement Generation Project" referred to on page 43 of CND's Application and underpins CND's proposal ("**Proposal**") to charge distribution rates to a "specific Large use customer"... a reference to TMMC... on the basis of Gross Load Billing. Accordingly, TMMC is directly affected by CND's Application.

We note that CND is advancing its Proposal in the context of its 2015 IRM Distribution Rate Application in year two of the five-year cycle that commenced with a cost-of-service rebasing application filed on October 1, 2013, for distribution rates for May 1<sup>st</sup>, 2014 to April 30, 2015. We do not know whether the load forecasts that were filed by CND in support of that application reflected the load displacement associated with the Generation Facility, commencing December 2015.

Should the Board decide to consider CND's Proposal in this rate adjustment proceeding, it would be TMMC's intention to participate fully in respect of CND's Proposal and other related issues. In this regard, TMMC intends to file interrogatories and make submissions. TMMC agrees with CND that this proceeding should be by way of written hearing, provided the procedural schedule is sufficiently flexible so as to permit two rounds of written interrogatories, if necessary.

Communications related to this proceeding should be directed to and/or served upon:



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-AND-

Mr. Pete Leonard, P.Eng. Facilities Manager, Cambridge/Woodstock Toyota Motor Manufacturing Company 1055 Fountain Street North Cambridge, Ontario N3H 4R7

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Yours very truly

## **Dentons Canada LLP**

## (signed) Helen T. Newland

Helen T. Newland HTN/ko

CC:

Pete Leonard, TMMC Dave Meier, TEMA Sarah Hughes, CND Grant Brooker, CND