



E2 ENERGY INC.

104, 6711 Mississauga Road
Mississauga, Ontario L5N 2W3
905-542-2250 x222
swalker@e2energyinc.com
www.e2energyinc.com

By Electronic Filing

May 14, 2015

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

Re: Waterloo North Hydro – 2016 Rate Application, Board File Number EB-2015-0108, Request for Hearing, Intervener Status and for Cost Eligibility Determination by the University of Waterloo

Dear Ms. Walli:

We are writing on behalf of the University of Waterloo (UW) to request a hearing, seek intervener status and cost award eligibility in this proceeding.

1. Request for Hearing

UW formally requests a Hearing to review the basis for Waterloo North Hydro's (WNH)'s Application for its 2016 Rate Application to affect a 12.8% increase in its annual revenue above current rates (25.6% above 2011 Board Approved Rates) and to contest the 50% increase in UW's specific distribution rate.

2. University of Waterloo (UW) and its Interest in a Proceeding

WNH has recently filed an Application for its January 1, 2016 Electricity Rates as based on the Cost of Service methodology. UW is a distribution customer of WNH and is the only remaining customer in WNH's rate category of "Large Use > 5 MW". Under the new rate setting methodology UW would see its annual distribution costs increase from C\$663k under the current rate structure to more than C\$ 1 million under WNH's proposed rate re-basing.

UW intends to participate in this proceeding for the purpose of ensuring the record in this proceeding is complete and that all relevant facts are placed in evidence for the Board's consideration. UW intends to make submissions and seek clarification on the issues which are raised by this Application, including:

- i. The appropriateness of the revenue increase for WNH as proposed and the allocation of the revenue requirements, including the associated rating factors attributed to the various rate classes;
- ii. Inconsistencies in WNH's Application specific to actual UW distribution rate impact versus those filed;
- iii. The fairness by which one rate class is expected to support the financial burden of the rate rebasing;

- iv. Potential inadequacies in the design of the allocation methodology, as accentuated by limited numbers in any specific rate category and by the use of generalized percentage allocations across rates;
- v. The extent to which “customer engagement” criteria and effectiveness are measured or deemed sufficient in rate basing evaluation;
- vi. WNH historic performance against system reliability statistical measures (CAIDI, SAIDI, SAIFI and/or equivalent), service quality measures in aggregate, by rate class and as applicable to UW rate class(es) as intended to support revenue requirement changes;
- vii. Any other issues that may be raised in the application or arise throughout the requested proceeding.

3. Cost Award

UW intends to seek a cost award in the proceeding on the grounds that its ability to participate is dependent upon a determination that it is eligible for such an award. UW believes it is eligible to apply for a cost award based on Section 3.03(a) of the Practice Direction on Cost Awards and hereby requests the Board’s determination of such cost eligibility

4. E2 Energy’s Representation of the University of Waterloo

E2 Energy Inc. represents UW as its energy consultant under the auspices of its formal written services agreement, which includes its electrical utilities.

5. UW Contacts

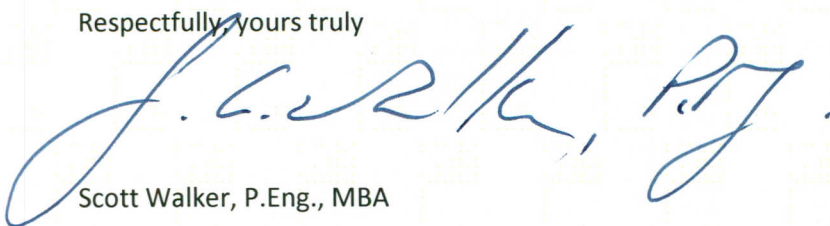
If the relief sought in this letter is granted, then UW requests that further communications with respect to this matter be sent to the following:

Scott Walker – President
E2 Energy Inc.
Suite 104, 6711 Mississauga Road
Mississauga, ON
L5N 2W3

Tel: (905) 542-2250 – ext 222
Fax: (905) 542-8250
Email: swalker@e2energyinc.com

Please contact the undersigned if the Board requires any further information in connection with this request.

Respectfully, yours truly



Scott Walker, P.Eng., MBA

- c. Albert P. Singh, Waterloo North Hydro
Rick Zalagenas, University of Waterloo