July 13, 2015

via email - signed original to follow by mail

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

Re: Kingston Hydro Corporation 2016-2020 Distribution Rates (EB-2015-0083)
- SIA Notice of Intervention

Dear Ms. Walli,

On June 25, 2015, the Ontario Energy Board ("OEB") issued a notice concerning an application filed by Kingston Hydro Corporation ("KHC") for approval of 2016-2020 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 which advocates for sustainable, prudent, cost effective, and equitably financed investment in public infrastructure. A detailed statement of the SIA's mandate and objectives has recently been filed and made available for public viewing with the OEB.

The SIA was approved as an intervenor in recent proceedings concerning the distribution rates of several other Ontario electricity distributors filing Custom IR Applications<sup>1</sup>. The SIA's intervention in this rate proceeding (pertaining to a similar application covering comparable issues) is motivated by largely similar concerns. Specifically, the SIA hopes to assist the OEB by exploring appropriate, cost effective, equitably financed, and sustainable investments by KHC in its distribution infrastructure.

The SIA expects that its intervention in this proceeding will focus on KHC'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 expects to constrain its involvement primarily to the

<sup>&</sup>lt;sup>1</sup> Hydro One Networks Inc, Horizon Corporation, Toronto Hydro-Electric System Limited, Hydro Ottawa Limited, and PowerStream Inc.

interrogatory and argument phases of the proceeding, and will further 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 KHC and citizens living within KHC'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
303 - 1350 Kensington Pkwy
Brockville, ON
K6V 6B9
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 KHC'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, SIA of Ontario