



April 11, 2016

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: Toronto Hydro-Electric System Limited Incremental Capital Module True-Up
Application (EB-2015-0173) - SIA Notice of Intervention**

Dear Ms. Walli,

On March 30, 2016, the Ontario Energy Board ("OEB") issued a notice concerning an application filed by Toronto Hydro-Electric System Limited ("THESL") for reconciliation of funding amounts approved under its Incremental Capital Module ("ICM"). 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 been filed and made available for public viewing with the OEB.

The SIA was approved as an intervenor in THESL's recent 2015-2019 distribution rate application, and believes that the insights it gained during the course of that proceeding will allow it to effectively contribute to the issues that will be addressed in this proceeding. The SIA intends to primarily focus its efforts in examining the prudence of THESL ICM spending (particularly in those areas where it deviated from its forecast plan) as well as a few select minor issues concerning the proposed cost recovery of the ICM variance amounts.

The SIA expects that its intervention in this proceeding will be fairly limited in scope. The SIA intends to constrain its involvement primarily to the interrogatory and argument phases of the proceeding, and will further endeavour to provide input only where it believes it can provide a unique perspective or insight, so as to avoid any unnecessary duplication with the work of 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
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 THESL's ICM expenditures were prudently incurred, and that any cost variance that may be owing from its ratepayers is properly justified.

Sincerely,

[original signed by]

Robert Sutton
Director, SIA of Ontario