

**E2 ENERGY INC.**

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July 20th, 2016

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

Re: EB-2016-0152, Ontario Power Generation Inc. (OPG) - Request for Intervener Status and for Cost Eligibility Determination by the Ontario Association of Physical Plant Administrators (OAPPA)

Dear Ms. Walli:

We are writing on behalf of the Ontario Association of Physical Plant Administrators to request intervener status and cost award eligibility in this proceeding.

1. OAPPA and Its Interest in this Proceeding

OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for all of Ontario's universities. The main objective of OAPPA is to promote cooperation among physical plant administrators for the provincially-assisted universities on matters including planning, construction, operation, maintenance and optimization of its utility requirements for all of its members' facilities. OAPPA's participation in other OEB Cases is well known to the Board and its continuing work on regulatory matters is one of a number of activities undertaken by OAPPA.

OAPPA uses an estimated 1.03 TWh of electricity annually, as received through a variety of distributors and via the Independent Electricity System Operators (IESO); approximately half of this electricity is supplied from OPG's regulated nuclear and hydraulic generation facilities. OAPPA wishes to participate in the proceeding to ensure that any changes to OPG's rates, which the Board may approve are fair and reasonable, and without undue financial harm to OAPPA. OAPPA intends to make submissions on the issues which are raised by this Application, including:

- i. Ensuring that the consumer interests of OAPPA, and that the interests of all post-secondary educational institutions are fully represented;
- ii. Testing the appropriateness of the annual revenue changes as proposed by OPG;
- iii. Confirming that all of the relevant facts have been placed into evidence;
- iv. Address of any other issues that may be raised in the application or arise throughout the proceeding.

2. Cost Award

OAPPA 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. As in prior proceedings, OAPPA 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. Attachment 1 provides further details accordingly.

3. E2 Energy's Representation of OAPPA

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

4. OAPPA Contacts

If the relief sought in this letter is granted, then OAPPA 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, Ontario L5N 2W3
Tel: (905) 542-2250 – ext 222
Fax: (905) 542-8250
Email: swalker@e2energyinc.com

OAPPA further requests that all correspondence and documentation also be copied to E2's consultant as follows:

Bruce Sharp, P. Eng., CEM, CMVP, CIGC
2035 Country Lane Court
Moffat, Ontario L0P 1J0
Tel: (905) 854-4645
Email: bruce@brucesharpenergy.com

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

Respectfully, yours truly

A handwritten signature in blue ink, appearing to read 'S. Walker, P.Eng.' with a stylized flourish at the end.

Scott Walker, P.Eng., MBA

cc. Carton Mathias, OPG
Charles Keizer, Torys
Crawford Smith, Torys
Paul Martin, Chair, OAPPA Energy Committee

ATTACHMENT 1
ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

Information Required by Section 3.03.1 of the Practice Direction on Cost Awards

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College	Ryerson University
Brock University	University of Toronto
Carleton University	University of Toronto – Mississauga
Guelph University	University of Toronto – Scarborough
Lakehead University	Trent University
Laurentian University	University of Ontario Institute of Technology
McMaster University	University of Waterloo
Nipissing University	University of Western Ontario
Ontario College of Art and Design University	Wilfred Laurier University
University of Ottawa	University of Windsor
Queen's University	York University

OAPPA's Mission Statement: *To assist higher education facilities' officers and staff develop, maintain and promote high standards and professional ideals for the management of campus facilities.*

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially-assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting such as that required under Ontario Regulation 397/11 (Energy Conservation and Demand Management Plans) and the Greenhouse Gas Emissions Reduction Program. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings, through its Energy Committee. Its participation focuses primarily on the rate and rate-related proceedings of its distributors and its regulator suppliers. The majority of OAPPA members are customers of Ontario's large to medium sized electrical utilities, but some are also direct customers of the Independent Electricity System Operation. From an operating perspective, the rate structures, rate levels, and terms and conditions of service of the utilities, the IESO and Ontario Power Generation are of direct and significant importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted collaboratively through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way. OAPPA is assisted in its interventions by external advisor(s) and specifically for electricity matters by E2 Energy Inc. E2 performs a number of functions as OAPPA's electricity consultant, however as it relates to regulatory matters those responsibilities include: providing case management services, regulatory interpretation and advisory services, assisting OAPPA in understanding the issues, helping to identify those issues upon which it will participate actively, advising on the formulation of positions and in representing OAPPA at the Board. The Chair of the OAPPA Energy Committee is E2's primary contact, and the current Chair of this Committee is Mr. Paul Martin, Director – Facilities Management (Business Operations), Western University. E2's representative is Scott Walker, President.