#### **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, as amended (the "OEB Act");

**AND IN THE MATTER OF** an Application by InnPower Corporation. under Section 78 of the OEB Act to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2017.

#### NOTICE OF INTERVENTION

#### OF THE

#### SCHOOL ENERGY COALITION

- 1. The School Energy Coalition ("SEC") applies for intervenor status in this proceeding.
- 2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board's website, here:

http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/rec/462191/view/

3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

### **Issues to be Addressed**

- 4. SEC's intended participation will focus on the following issues:
  - a. The proposed methodology used for setting rates for the period beginning January 1, 2017;
  - b. The proposed costs and offsets for the test year, the resulting revenue requirement, the forecast of revenues, and the resulting deficiency;
  - c. The past and proposed capital spending of the Applicant and the resulting proposed rate base amounts:
  - d. The cost allocation and rate design proposed for the collection of the revenue requirement and deficiency from customers;
  - e. Benchmarking and customer engagement results of the Applicant;

- f. Reliability, customer service, and other outcomes achieved and proposed by the Applicant;
- g. The effective date of the proposed rates;
- h. Compliance by the Applicant with the Settlement Agreement and Board order in EB-2014-0086;
- i. All requests for creation and/or clearance of deferral accounts, and all other components of the Application; and
- j. Generally to represent the interests of school boards and their students in this process.

# **The Intervenor's Intended Participation**

5. The School Energy Coalition intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearing of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order.

## **Nature of Hearing Requested**

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

### **Counsel/Representative**

- 7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:
  - a. School Energy Coalition: (electronic copies only)

### ONTARIO EDUCATION SERVICES CORPORATION

c/o Ontario Public School Boards Association 439 University Avenue, 18th Floor Toronto, ON M5G 1Y8

Attn: Wayne McNally, SEC Coordinator

Phone: 416 340-2540 Fax: 416 340-7571

Email: wmcnally@opsba.org

# b. SEC's counsel: (both electronic and paper copies)

### JAY SHEPHERD PROFESSIONAL CORPORATION

2200 Yonge Street Suite 1302 Toronto, Ontario, M4S 2C6

Attn: Jay Shepherd Phone: 416-483-3300 Phone: 416-804-2767 Fax: 416-483-3305

Email: jay.shepherd@canadianenergylawyers.com

with an electronic copy to:

Attn: Mark Rubenstein Phone: 416-483-3300 Fax: 416-483-3305

Email: mark.rubenstein@canadianenergylawyers.com

Respectfully submitted on behalf of the School Energy Coalition this March 7, 2017.

Jay Shepherd Counsel for the School Energy Coalition