

June 12, 2017

**BY COURIER (2 COPIES) AND RESS**

**Ms. Kirsten Walli**

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: EB-2017-0150 – Independent Electricity System Operator (IESO)  
Revenue Requirement**

We are writing on behalf of Environmental Defence to request intervenor status and cost eligibility in this proceeding.

Environmental Defence seeks intervenor status and costs eligibility as a leading environmental organization that represents both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through increased conservation and other means.

**Nature and Scope of Intended Participation and Interest in Proceeding**

Environmental Defence wishes to file interrogatories, participate in the hearing, review and test the evidence, make submissions, and seek a cost award. Environmental Defence's interest in this proceeding is in promoting both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through conservation and by increasing access to low-cost renewable energy.

Environmental Defence expects to address important issues relating to its mandate, including issues relating to the IESO's proposed regulatory scorecard. For example, Environmental Defence wishes to provide submissions on the metrics to be included in the regulatory scorecard, including metrics relating to the IESO's role regarding energy conservation and the government's greenhouse gas emissions targets.

Environmental Defence may seek to provide expert evidence and requests the opportunity to elect whether to do so after receiving the IESO's proposed scorecard and its interrogatory responses.

**Oral Hearing**

Environmental Defence requests an oral hearing. Environmental Defence anticipates there being important factual issues relating to the regulatory scorecard that would benefit

from oral evidence and cross-examination. For example, the extent of the IESO's control over a certain metric (e.g. transmission losses) is a factor to consider in deciding whether that metric should be included in a regulatory scorecard. That is a factual issue on which there may be divergent views, warranting oral evidence and cross-examination in order to resolve.

## **Environmental Defence**

### *A. Mandate and Objectives of Environmental Defence*

Environmental Defence has been working since 1984 to protect Canadians' environment and human health. Environmental Defence's mandate and objective is to challenge, and inspire change in government, business and people to ensure a greener, healthier and prosperous life for all. Its vision is to create a world Canadians are proud to pass on to their children.

### *B. Membership and Constituency*

Environmental Defence is supported by many thousands of donors across the province and country. It sees its constituency as Canadians who are concerned about the environment and the legacy that we will pass on to our children.

### *C. Types of Programs and Activities that Environmental Defence Carries Out*

Environmental Defence has been highly successful in its public interest advocacy on energy issues. Environmental Defence's environmental work, on issues ranging from toxic chemicals to clean beaches, has led to concrete improvements in the lives of Canadians. For example, the dangerous chemical Bisphenol A ("BPA") is now banned in baby bottles in Canada due to concerns first raised by Environmental Defence in 2007. For many years, Environmental Defence has participated in the federal government's Chemicals Management Plan.

Environmental Defence is also the coordinator of Blue Flag Canada, which certifies beaches so that Ontario families can enjoy this public resource. It also co-founded Blue Green Canada with the United Steelworkers, which promotes green energy initiatives that have positive employment and economic impacts.

Environmental Defence also publishes reports and guides in the area of energy conservation, efficiency, and policy. For example, it has created an interactive online tool to help energy consumers reduce their bills through energy efficiency initiatives. Some further publications include:

- *Powering up efficiency to get the conservation framework right;*
- *The \$2 Billion Question - How Can Ontario Reinvest Cap-and-Trade Proceeds to Meet its Climate Challenge and Grow the Economy?;*
- *What to Look for in the Canadian Energy Strategy;*

- *Backgrounder - Coal and Renewable Energy in Ontario;*
- *Building Ontario's Green Economy: A Road Map;*
- *Ontario Feed-In Tariff: 2011 Review;*
- *The Global Clean Energy Jobs Race: Ontario's Opportunity;*
- *Blowing Smoke: Correcting Anti-Wind Myths in Ontario;*
- *Faces of Transformation: Jobs, economic renewal and cleaner air from Year*
- *One of Ontario's Green Energy Act;*
- *Falling Behind: Canada's Lost Clean Energy Jobs; and*
- *Greening Canada's Building: Report Card.*

These and other reports can be found at <http://environmentaldefence.ca/reports/>.

### **Requests for Evidence and Addresses of Representative**

Environmental Defence requests that electronic copies of the pre-filed materials and all other documents in the proceeding be delivered to the following consultant and counsel:

Electronic copies to:

**Jack Gibbons**

Ontario Clean Air Alliance  
160 John Street, Suite 300  
Toronto, Ontario M5V 2E5  
Tel: (416) 260-2080 ext. 2  
Fax: (416) 598-9520  
E-mail: [jack@cleanairalliance.org](mailto:jack@cleanairalliance.org)

Electronic copies to:

**Murray Klippenstein** – [murray.klippenstein@klippensteins.ca](mailto:murray.klippenstein@klippensteins.ca)  
**Kent Elson** – [kent.elson@klippensteins.ca](mailto:kent.elson@klippensteins.ca)

**Klippensteins**

Barristers & Solicitors  
160 John Street, Suite 300  
Toronto, Ontario M5V 2E5  
Tel: (416) 598-0288  
Fax: (416) 598-9520

We also request that the above individuals be listed on the intervenors' list under Environmental Defence.

### **Address of Environmental Defence**

Environmental Defence's full name and address is:

**Environmental Defence Canada Inc.**

116 Spadina Avenue, Suite 300

Toronto, Ontario M5V 2K6

Tel: (416) 323-9521

Fax: (416) 323-9301

However, please send correspondence and any other materials to both Jack Gibbons and to counsel as the authorized representatives.

**Service on other Parties**

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson