**EB-2017-0049**

**June 7th, 2017**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998;

**AND IN THE MATTER** of an Application by Hydro One Networks Inc. For an Order or Orders approving rates for the distribution of electricity, to be effective on January 1st 2018 and continuing for a four year period ending on December 31st 2022.

**NOTICE OF INTERVENTION**

**OF**

**BALSAM LAKE COALITION**

1. Balsam Lake Coalition hereby applies for intervenor status in this proceeding.
2. Balsam Lake Coalition (BLC) is comprised of several seasonal customers of Hydro One Networks Inc. (HON). BLC has canvassed the opinions of various cottage groups and has found that a large number of seasonal customers are very dissatisfied with the huge disparity in electricity rates between year-round (YR) and seasonal residential (SR)customers of HON, both of whom are located on the same road, the same density zone and are using the same feeder lines and transformers etc., and yet have very different rates.
3. BLC’s intended participation will focus on the following issues:
4. There appears to be no valid reason to have higher (SR) distribution (DX) rates than YR-DX rates because the SR cost profile does not differ materially from the YR residential class cost profile. HON’s justification for higher SR-DX rates is their claim that the average SR customer’s KWH consumption is about one-half the average YR KWH consumption. That claim has been largely rejected by the OEB’s Draft Report (EB-2012-0410) all- fixed monthly rate design: See page 13, “costs are driven largely by two factors: the number of consumers and the peak demand on the entire distribution system”. “The conclusion was that customer numbers was therefore the dominant cost driver”- and not KWH consumption.
5. HON also claimed that SR customer’s peak demand is very different from year-round customer’s peak demand which justified higher SR rates. This claim also is largely rejected by the OEB’s decision dated March 12th 2015 (EB-2013-0416) see page 48: “the OEB is not convinced that the load characteristics of seasonal customers are sufficiently different from their neighbours in the residential classes to justify the continuation of the class”.
6. HON appears to have deviated from generally accepted rate-making principles, such as:
7. equal customers should pay equal rates & unequal customers should pay unequal rates,
8. rates should be a true & accurate reflection of HON’s cost to provide service,
9. all consumers shall have non-discriminatory access to the transmission grid, as per

 *Part 3, Sec. 26.1,The Electricity Act 1998,*

1. BLC intends to participate in any pre-hearing procedures, settlement conferences, written or oral submissions, as well as any process the Board should order.
2. BLC has participated in several previous hearings, settlement conferences and Stakeholder Consultations.
3. BLC hereby applies for recovery of its costs reasonably incurred, including travel, parking and legal counsel.
4. The Balsam Lake Coalition requests that all documents or notices be sent as follows:

**Balsam Lake Coalition**

**c/o Nicholas P. Copes**

**14 Baymark Rd.**

**Thornhill, Ontario L3T3X9**

**Tel: 905-889-2449**

**Email:** **ncopes@sympatico.ca**

**Also send to:**

**Bill Cheshire**

**Email:** **billcheshire@sympatico.ca**

**And also send to:**

**Robert Nixon**

**Email: robert.nixon@rogers.com**

**TO: Ms. Kirsten Walli (by email)**

**Board Secretary, Ontario Energy Board**

**P.O. Box 2319**

**2300 Yonge St., 27th Floor**

**Toronto, Ontario**

**M4P1E4**

**c.c. Ms. Kelly Denneny (by email)**

**Regulatory Coordinator, Regulatory Affairs**

**Hydro One Networks Inc.**

**483 Bay St. 8th Floor, South Tower**

**Toronto, Ontario, M5G2P5**