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File: 7161

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September 19, 2017

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (“OSEA”) Notice of Motion  
Board File No. EB 2017-0049**

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We are counsel for OSEA. OSEA requested intervenor status in Hydro One Networks Inc.’s application for approval of its distribution rates for 2018-2022. In the Board’s Procedural Order No. 1 dated August 30, 2017, the Board denied OSEA intervenor status on the grounds that OSEA had not established that it has a substantial interest in the current proceeding.

OSEA requests a motion to review the decision of the Board to deny OSEA intervenor status, pursuant to Rules 40.01 and 42.01 of the Board’s Rules of Practice and Procedure. OSEA submits that the Board erred by deciding that OSEA does not have a substantial interest in the proceeding, on the grounds that this was an error in fact.

**OSEA’S SUBSTANTIAL INTEREST IN THE PROCEEDING**

OSEA is a public interest organization that works towards a sustainable energy future. This includes ensuring rates that encourage conservation and the incorporation of renewable energy. OSEA’s membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA is Ontario’s lead advocate and facilitator for sector transformation to a more sustainable energy economy.

OSEA has a substantial interest in the Connection Impact Assessment rates (“CIA”) that Hydro One seeks approval of in this proceeding. Where a generator is seeking to connect a renewable energy generation facility to a distribution system, the generator must pay for the CIA to be conducted. The rate that Hydro One proposes for the CIA directly impacts OSEA’s membership, as well as OSEA’s mandate to promote renewable energy development. High CIA rates may be prohibitive to renewable energy development, and in particular, small generation. OSEA will provide value to the Board by making submissions in this proceeding regarding the CIA rates. OSEA will also make submissions regarding the scorecard metrics used to measure connection of renewable generation.

OSEA also has a substantial interest in Hydro One’s conservation and demand management programs, the CDM forecast, and the customer care staffing model as it relates to conducting outreach programs and enrolling customers in conservation programs. Conservation and outreach

programs are important for OSEA's mandate to encourage conservation within energy consumers. OSEA envisions every Ontarian contributing to the transition to a more sustainable energy economy. OSEA requests that the Board review its decision to deny OSEA intervenor status. OSEA continues to seek eligibility for a cost award.

Yours truly,



Robert Woon

cc: Janis Wilkinson, OSEA  
Marion Fraser, Fraser & Company

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