

October 16, 2017

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

Via the Ontario Energy Board Web portal

Dear Ms. Walli:

Re: EB-2017-0290

In response to the Ontario Energy Board's (OEB) Notice of Hearing dated October 4, 2017, the Electricity Distributors Association (EDA) is writing to seek intervenor status in the above-named proceeding.

The EDA is the voice of Ontario's local distribution companies (LDCs) and represents the interests of over 60 publicly and privately owned LDCs in Ontario. The Electricity Distributors Association is the trusted and vital source for advocacy, insight and information for LDCs. The distribution sector delivers electricity to 5 million residential, commercial, industrial and institutional customers throughout the province.

Ontario's LDCs have a significant interest in the above-named proceeding. They are solely responsible for the ownership and operation of the smart meters deployed throughout Ontario that record and gather electricity consumption data for Ontario's small volume consumers: residential and small general service <50kW customers. LDCs collect the Smart Metering Charge (SMC) from these customers monthly on behalf of the SME; the SMC is included within the delivery line item of bills.

LDCs rely on the data gathered through smart meters to serve these small volume consumers. LDCs use their Operational Data Stores and other 'back office' systems to validate-estimate-edit smart metered data prior to making it accessible to customers on the next day and prior to transmitting it to the SME. The data returned by the SME is one component of the data used by the LDC to correctly and accurately bill these customers for the provision of commodity supply and for all other aspects of service, including for the SME's provision of service. All LDCs strive to provide their customers with the best quality of bill experience by meeting – and for the majority of LDCs - exceeding the OEB's 98% bill accuracy expectation. In addition, these small volume consumers regard the LDC as the 'face of the electricity system' and they direct their questions to LDCs. LDCs have created an enviable record of providing these and all other customers with correct and accurate responses, routinely during the first customer contact.

As a result, LDCs have a direct and relevant interest in the SME's Fee Application.

As the voice of the sector and on behalf of our LDC membership, the EDA seeks intervenor status in the above-named matter. The EDA intends to participate in this proceeding by reviewing the publicly filed

Electricity Distributors Association

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documents including the application and pre-filed evidence as well as future filings. The EDA reserves the right to submit interrogatories, evidence, or argument.

The OEB previously granted the EDA intervenor status in the Combined Proceeding of the 2012 SME Fee Application and Determination of Appropriate Allocation and Recovery of SMC (respectively EB-2012-0100, EB-2012-0211).

The EDA does not intend to seek an award of costs as per the Board's Cost Award Guidelines.

The EDA plans to access the evidence electronically through the OEB's website.

Please direct all correspondence to the individuals named below:

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AND

Alan H. Mark Partner Goodmans LLP Bay Adelaide Centre 333 Bay Street, Suite 3400 Toronto, ON, M5H 2S7 416.597.4264 Email: <u>amark@goodmans.ca</u>

Sincerely,

Teresa Sarkesian President and Chief Executive Officer