

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Upper Canada Transmission, Inc. under section 92 of the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B) for an Order or Orders granting leave to construct a new double circuit 230 kV electricity transmission line between Thunder Bay and Wawa

AND IN THE MATTER OF an Application by Hydro One Networks Inc. pursuant to s. 92 of the 6 Act for an Order or Orders granting leave to upgrade existing transmission station facilities in the Districts of Thunder Bay and Algoma.

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 intervenor’s members have a significant interest in the activities of regulated utilities and their affiliates in the province, due to the severe financial implications those activities have on school boards, their students and the people of the province of Ontario. Utility costs are one of the most significant cost pressures facing school boards. The cost of energy services to the intervenor’s members is currently more than \$500 million, and has increased rapidly over the last five years. To produce balanced budgets in the face of ever increasing utility costs, school boards have repeatedly been forced to cut essential programs and services to the detriment of the students and the public of the province of Ontario.
4. SEC was an active intervenor in all portions of the related East-West Tie designation proceeding (EB-2011-0140) and was selected as one of two intervenors eligible for an award of costs. SEC also filed submissions regarding the request by Upper Canada Transmission Inc. for approval of recovery of additional development costs as a result of the revised in-service date (EB-2015-0216).
5. The SEC 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

6. SEC's intended participation will focus on the following issues:
 - a. Both the Upper Canada Transmission Inc. and Hydro One Networks Inc. projects as it relates to the Board's approval under section 96(2) of the *Ontario Energy Board Act*, specifically ensuring the project meets the interests of consumers with respect to prices and the reliability and quality of electricity service;
 - b. Evaluating Upper Canada Transmission Inc.'s forecasts cost for its project, as it relates to the considerations under section 96(2) of the *Ontario Energy Board Act*, including how the forecast costs differ from those estimated at the time of the designation proceeding (EB-2011-0140);
 - c. Ensuring the Upper Canada Transmission Inc. meets its commitments made during the designation proceeding (EB-2011-0140), and those required by the Board in its Phase 2 Decision and Order in EB-2011-0140;
 - d. Request by Upper Canada Transmission Inc. for the establishment of a Construction Work in Progress ("CWIP") deferral account an order declaring the final balance of the Development Cost Deferral Account as the opening balance of such CWIP account;
 - e. All other issues in the proceeding; and
 - f. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

7. SEC 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

8. 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

9. 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)

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION
2200 Yonge Street, Suite 1302
Toronto, Ontario, M4S 2C6

Attn: Mark Rubenstein
Phone: 647-483-0113
Fax: 416-483-3305
Email: mark@shepherdrubenstein.com

with an electronic copy to:

Attn: Jay Shepherd
Phone: 416-804-2767
Email: jay@shepherdrubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this October 24, 2017.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition