



BY EMAIL and RESS

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January 17, 2018
Our File No. EB-2017-0061

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0061 – Milton Hydro – SEC Notice of Intervention

We are counsel for the School Energy Coalition. We are enclosing with this letter our Notice of Intervention in this proceeding. Although we do not normally do so, in this case it is appropriate to provide a fuller explanation as to the interest of school boards in this proceeding.

As the Board will be aware, schools are among the early adopters of behind-the-meter generation in volume, particularly solar installations on school roofs. That is likely to increase over time. As such, additional charges that may affect the economics of those projects are a significant concern, not just in Milton, but across the province.

On a general level, SEC has participated in policy discussions initiated by the Board and others related to distribution rate-setting that reflects behind-the-meter impacts. On a more specific level, SEC has discussed with the local school boards in Milton, and school boards across the province, the potential impact of changes to distribution pricing on upcoming behind-the-meter projects.

It is possible to keep the distributor whole, without restricting the ability of customers to implement renewable energy projects, but the specific design of standby and similar



pricing is critical to achieving that balance. That is particularly true in solar projects, where the nameplate, peak, and average load displacement are so very different.

Thus, after review SEC has determined that, until the Board establishes a general rate policy dealing with this issue, it is essential that the proposals of individual LDCs be reviewed carefully by customers affected to make sure they don't have unintended consequences.

SEC does not intend to participate in other aspects of the Milton Hydro Application.

All of which is respectfully submitted.

Yours very truly,

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION

A handwritten signature in black ink, appearing to read "Jay Shepherd", written over a light blue rectangular background.

Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Milton Hydro Distribution Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of May 1, 2018.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
1. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document>
2. The School Energy Coalition 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

3. SEC’s intended participation will focus on the following issues:
 - a. Proposed charges for customers with behind the meter generation;
 - b. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

4. 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

5. 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

6. 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: Jay Shepherd
Phone: 416-804-2767
Fax: 416-483-3305
Email: jay@shepherdrubenstein.com

with an electronic copy to:

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

Respectfully submitted on behalf of the School Energy Coalition this January 17, 2018.

Jay Shepherd
Counsel for the School Energy Coalition