



June 11, 2018

Ontario Energy Board
2300 Yonge Street, 27th Floor
P. O. Box 2319
Toronto, ON M4P 1E4
Attn: Ms. K. Walli
Board Secretary

Dear Ms. Walli:

Re: **EB-2018-0119**

Please be advised that the Electricity Distributors Association (EDA) seeks intervenor status in the above named proceeding.

The EDA represents Ontario's electricity distributors who provide electrical distribution service to over 5,000,000 end users in the province. The EDA's members are licensed by the Ontario Energy Board (OEB) and are subject to the OEB's licensing, rate making and code making powers.

Several of the EDA's members are directly connected to Hydro One Networks Inc.'s (HONI) transmission infrastructure while others are served by HONI's low voltage system. The EDA's interests in this matter are technical and financial:

- technical impacts experienced on the transmission system may impact the quality or reliability of service provided by the LDC to its customers;
- any financial impacts experienced by HONI may impact the rates charged by the LDC to its customers.

The EDA notes the following specific concerns:

- Ontario's electricity distributors need to be assured that the transmission system's grounding infrastructure is continuous and is compatible with that used by the electricity distributor so that the end use customers can be served safely and continuously.
- Transmission infrastructure, including the grounding infrastructure, has been or is being appropriately designed and constructed using a variety of standards. Ontario's LDCs have designed and constructed their distribution systems to accommodate the connected transmission infrastructure. LDCs will need to be aware of any technical revisions or amendments and their effect on the transmission infrastructure so that they can continue to safely and reliably serve their customers.

- Any costs incurred by HONI (e.g., to perform work, for investments in the transmission system) may be recovered through OEB authorized Uniform Transmission Rates (UTR). UTRs are flowed through to distribution customers through OEB authorized Retail Transmission Service Rates (RTSR). The EDA's members all charge RTSRs and will need to be appropriately prepared to respond to customers questions as RTSRs change.

The EDA intends to participate in the OEB's processing of the subject application in a responsible manner and acknowledges that under OEB rules it is not eligible to seek to recover its costs. The EDA requests that all written materials be provided in electronic format and will conduct its intervention in English.

The EDA's contact information appears below.

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Sincerely,



Justin Rangooni
Vice President, Policy and Government Affairs