

June 18, 2018

RESS, E-MAIL & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Application of Energy+ Inc. for Approval of 2019 Distribution Rates (“Application”);
TMMC Request for Intervenor Status;
Board File No.: EB-2018-0028**

1. TMMC’s Interest

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. (“**TMMC**”) to request that it be granted intervenor status in the above-referenced proceeding. TMMC owns and operates a car manufacturing plant located in Cambridge, Ontario (the “**Cambridge Plant**”). The Cambridge Plant is connected to the electricity distribution system of Energy+ Inc. (“**Energy+**”) and TMMC is one of Energy+’s two Large Use Service customers.

In the period 2012-2015, TMMC worked closely with Cambridge and North Dumfries Hydro Inc. (now Energy+), in conjunction with the Ontario Power Authority (as it then was), to develop a 9.2 megawatt natural gas-fired combined heat and power generation facility (“**Generation Facility**”) owned and operated by TMMC and located at the Cambridge Plant. The Generation Facility went into service on January 1, 2016.

TMMC is the “Large Use Service” customer with load displacement generation that is referred to in the Application at Exhibit 7, page 10 of 105. TMMC will be specifically and directly affected by Energy+’s proposals, if approved, to impose a standby rate and to use gross load billing for the purpose of allocating Retail Transmission Rates – Network and Connection charges to customers with load displacement generation.

2. TMMC’s Participation in the Proceeding

It is TMMC’s intention to participate fully in the proceeding with a particular focus on the following issues: (a) standby rates; (b) gross load billing for load displacement customers; (c) the disposition and allocation of certain of Energy+’s variance and deferral account balances; and (d) Energy+’s customer engagement and consultation in respect of the Application, as it pertains to TMMC.

TMMC intends to participate fully in the proceeding including filing interrogatories, cross-examining witnesses and making submissions. It is also TMMC's intention to file its own written evidence dealing with the issues identified above and to produce witnesses to speak to such evidence.

3. Hearing Process

TMMC requests that the Application be heard orally. The Application includes two requests... for approval of a standby rate and for approval of gross load billing for load displacement customers...which are the subject of current and on-going OEB consultations which, when concluded, presumably will result in a set of guiding principles, generic methodologies or both, applicable to all distributors (see EB-2015-0043 and letter from the Board of March 29, 2016 to all Licensed Distributors). Absent such generic principles and/or methodologies, the litigation of these issues in the context of a utility-specific application is problematic because it puts an inordinate burden on individual ratepayers, such as TMMC. In the circumstances, TMMC feels that it has no option but to file its own evidence and put forward company and, possibly, expert witnesses who can properly respond to Energy+'s proposals.

4. Costs

TMMC does not intend to seek a cost award in this proceeding.

5. Contacts

Communications related to this proceeding should be directed to and/or served upon:

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Yours very truly

Dentons Canada LLP

Original signed Helen T. Newland

Helen T. Newland

HTN/ko

cc: Melody Collis, TMMC
Jo Keaton, TMNA
Sarah Hughes, Energy+
John Vellone, BLG
Bill Fantin
Pete Leonard