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Delivered by Email, RESS & Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2701
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Energy+ Inc. Cost of Service Application – APPrO Notice of Intervention
(EB-2018-0028)**

We are counsel to Energy+ Inc. in respect of the above noted matter. We are writing in response to a letter received from counsel to the Association of Power Producers of Ontario (APPrO) dated June 28, 2018 in respect of Energy+ Inc.'s objection to APPrO's request for cost eligibility in the above noted proceeding.

Energy+ would like to clarify that it is not objecting to the intervention of APPrO in the application. However, Energy+ is not a large utility. It is a municipally owned electricity distribution company that provides electricity distribution and related services to approximately 65,000 residential, commercial, industrial and institutional customers within the City of Cambridge, Township of North Dumfries and parts of the County of Brant. Any costs awards granted in this Application are funded by this small group of customers.

While it may be true that residential, commercial, and industrial customers may choose to own and deploy distributed energy resources including behind the meter generation and storage resources - these customer groups are represented by various parties in this proceeding already (OEB Staff, CCC, VECC, SEC, CME and TMMC have all intervened and, with the exception of TMMC, have requested cost eligibility and Energy+ has no objections to those requests). While APPrO may represent the special interests of power generators, it should do so at its own expense in accordance with the rules stipulated in the Board's Practice Direction on Cost Awards. Finally, while the letter from counsel to APPrO cites a number of proceedings where APPrO was previously granted a cost award, it is notable that none of those cases involved an electricity distribution rates case.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Original signed by John A.D. Vellone

John A. D. Vellone

cc: Sarah Hughes, Energy+ Inc.
Intervenors in EB-2018-0028