

September 23, 2018

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
P.O. Box 2319  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2018-0243 – Ontario Power Generation Inc. – Recovery of 2017 Deferral and Variance Accounts**

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy Board (“OEB”) by Ontario Power Generation Inc. (“OPG”) for recovery of 2017 year-end balances in certain deferral and variance accounts. The Board’s order in this proceeding will ultimately impact the bills of Ontario residential electricity consumers.

On November 8, 2017, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test OPG’s evidence, including the balances in the deferral and variance accounts and the proposals for recovery;
2. To assess any other proposals that have been set out in the Application that may impact Ontario electricity ratepayers; and
3. To participate in the various stages of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing.

The Council cannot assess at this time, prior to a completion of the discovery phase, whether an oral hearing process would be required. The Council recommends, however, that the Board include a Settlement Conference as part of this proceeding. The Council is of the view that given the nature of the issues in this proceeding ( the consideration of balances in approved accounts) a full or partial settlement between OPG and the intervenors might be achieved.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many electricity applications over a long period of time, including all of OPG’s previous applications. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all correspondence related to this proceeding and hard copies of the Applicant’s evidence should be sent to:

Julie Girvan

Consultant  
62 Hillsdale Avenue East  
Toronto, ON  
M4S 1T5  
[jgirvan@uniserve.com](mailto:jgirvan@uniserve.com)

Michael Buonaguro  
Counsel  
24 Humber Trail  
Toronto, ON  
M6S 4C1  
[mrb@mrb-law.com](mailto:mrb@mrb-law.com)

Please let us know if any further information from the Council is required at this time.

Yours truly,

*Julie E. Girvan*

Julie E. Girvan

CC: Ken Whitehurst, Consumers Council of Canada  
OPG, Regulatory Affairs