

Environment Indigenous Energy Law

Direct Dial: File: 416.862.4825 7700

Sent by Email and RESS Filing

March 4, 2019

Ontario Energy Board P.O. Box 2319 2300 Yonge Street, 27<sup>th</sup> Floor Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

#### Re: Ontario Sustainable Energy Association ("OSEA") Application for Intervenor Status Board File No EB-2019-0002

We are counsel for OSEA. OSEA requests intervenor status in the Independent Electricity System Operator's ("IESO") application for approval of its 2019 revenue requirement, expenditure and fees. OSEA also seeks eligibility for a cost award.

# **OSEA AND ITS INTEREST IN THE PROCEEDING**

OSEA is a public interest organization that works towards a sustainable energy future. This includes ensuring funding and rates that encourage conservation and the incorporation of renewable energy. OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. Its membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA is Ontario's lead advocate and facilitator for sector transformation to a more sustainable energy economy.

OSEA actively participates in Board proceedings and was granted intervenor status by the Board in previous hearings. OSEA participated in IESO's application for approval of its 2018 Expenditure and Revenue Requirement Submission (EB-2018-0331), 2017 Expenditure and Revenue Requirement Submission (EB-2017-0150) and 2016 Expenditure and Revenue Requirement Submission (EB-2015-0275). OSEA previously made submissions on the IESO's proposed Regulatory Scorecard and advocated for the inclusion of additional metrics for conservation and renewable energy. OSEA also provided comments on IESO's Market Renewal Program.

Willms & Shier Environmental Lawyers LLP - Toronto

Toronto Calgary Ottawa **willmsshier.com** 



Environment Indigenous Energy Law

OSEA contributed fully in these matters and believes it can continue to offer assistance and insight to the Board in this proceeding.

## NATURE AND SCOPE OF OSEA'S INTENDED PARTICIPATION

OSEA intends to be an active participant in this proceeding. OSEA will submit interrogatories, attend technical and settlement conferences, provide oral and written submissions, and attend hearings in accordance with the Board's procedures stipulated for this proceeding. OSEA will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed.

## **ORAL VS. WRITTEN HEARING**

OSEA agrees that a written hearing is appropriate for this proceeding.

## **COSTS**

OSEA seeks approval of costs in this proceeding. OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede energy conservation and sustainable energy development for Ontario.

OSEA's members, both individuals and organizations are interested in the development of sustainable energy in Ontario as consumers, individuals and citizens of Ontario. OSEA has been awarded costs by the Board in previous hearings, and the Board recognized that OSEA can provide "an important and unique perspective" in EB 2011-0118. OSEA can continue to provide an important and unique perspective in the current proceeding. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

#### **REPRESENTATIVES**

OSEA's counsel and consultant in this matter are:

Joanna Vince/Matt Gardner jvince@willmsshier.com / mgardner@willmsshier.com Willms & Shier Environmental Lawyers LLP 1 Toronto Street, Suite 900 Toronto, ON M5C 2V6 T: 416-862-4830 / 416-862-4825 F: 416-863-1938 Marion Fraser, Consultant marion.fraser@rogers.com Fraser & Company 1005 - 65 Harbour Square Toronto, ON M5J 2L4



Environment Indigenous Energy Law

Yours truly,

Most F. Gul

Matt Gardner

cc: Dan Goldberger, OSEA Marion Fraser, Fraser & Company

Document #: 1499295