



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

March 22, 2019

Re: EB-2018-0288 Responding to DERs Pollution Probe's Letter of Intervention

Dear Ms. Walli:

I am writing pursuant to the Board's Notice of Application and Hearing regarding the above proceeding to request intervenor status and request to be eligible for an award of costs with respect to the above-noted proceeding.

## **About Pollution Probe**

Pollution Probe is a national charitable organization based in Toronto that exists to improve the health and well-being of Canadians by advancing policy that achieves positive, tangible environmental change. Pollution Probe represents its supporters and the public at large on energy, environmental, public health, transportation and related issues. Since 1969, we have been a recognised leader in defining environmental progress through research, awareness, education and pressing for practical balanced solutions through evidence-based advocacy.

As Pollution Probe begins its 50th year, we continue to be recognised as a leader in Ontario and Canada and we continue to be relied upon by governments and industry at all levels for creating balanced and practical solutions to environmental problems through our evidence-based collaborative approach.

Pollution Probe is unique in that it works with and represents the issues facing a broad group of stakeholders including the public (including Ratepayers), the non-profit sector, industry, municipal, provincial and federal policy makers — to find the correct balance between economics and the environment, and to help policy makers deliver policies to more effectively protect the environment, while balancing economic constraints.

It is in the public's interest to hear our perspective because our evidence-based collaborative approach means our positions are based on agreed-upon evidence and have broad consensus-based support.



Pollution Probe is actively working with communities and policy makers on the transition in the energy system. For example, we are working with stakeholders on issues related to the effective introduction of EVs in Canada, and we are currently conducting research on low-carbon innovation and regulated utilities, and on the future of natural gas in a low carbon energy system.

## **Our Interests**

Pollution Probe is intervening in order to ensure that the policy implications of the proceeding adequately balance economic with environmental implications to ensure we do not hinder the effective and efficient transition to a lower carbon energy system. Pollution Probe will focus, among other issues as they arise, on the following:

- Ensuring that any regulatory response to the increasing deployment of DERs will not hinder the effective transition to a low-carbon energy system
- Regulatory responses to innovation
- Ensuring that a proper valuation of DERs also considers environmental attributes in addition to economic and technical considerations
- Proposing a proper balance between economic and environmental factors in future cost-benefit analyses.

In addition to Pollution Probe staff, we will also be retaining the services of Michael Brophy for this proceeding.

## **Intention to Seek Cost Awards**

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for individual research projects, such as on EVs and innovation and regulated utilities, from a variety of public and private sources.

Pollution Probe's engagement will be measured and focused, we request to be eligible for an award of costs for its participation in this proceeding. Pollution Probe qualifies under Section 3 of the Practice Direction of Cost Awards as we "primarily represents an interest or policy perspective relevant to the Board's mandate and to the proceeding for which cost award eligibility is sought".



## **Notice**

Please serve all correspondence pertaining to this proceeding to:

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With an electronic copy to Pollution Probe's Senior Associate:

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Phone: 647-330-1217

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Please do not hesitate to contact me if you have any questions or require further information

Christopher Hilkene

CEO