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July 8, 2019

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

Dear Ms. Walli,

**RE: EB-2018-0165: Toronto Hydro Application for 2020-2024 Rates
Energy Probe Objection to DRC Expert Witness**

In the interest of saving time in the hearing room, Energy Probe is placing its objections to Dr. Josipa Petrunic being qualified as an expert witness in this proceeding in writing.

Dr. Petrunic is a lobbyist registered with the Office of the Integrity Commissioner of Ontario. Attached is a document which confirms that fact. According to the document, Dr. Petrunic is a Senior Officer of Canadian Urban Transit Research and Innovation Consortium (CUTRIC).

Membership of CUTRIC includes manufacturers and suppliers of rechargeable battery powered vehicles, rechargeable batteries, battery charging equipment, contractors that build charging stations, and engineering companies that design them. These commercial entities would profit from large scale adoption of rechargeable battery powered vehicles. Dr. Petrunic promotes their commercial interests at industry conferences and lobbies on their behalf various Ontario government ministries, including the Ministry of Energy, Northern Development and Mines.

Membership of CUTRIC also includes Toronto Hydro. It is not clear to what degree Dr. Petrunic is lobbying at Queens Park on behalf of Toronto Hydro, but there is a possibility that she is.

Dr. Petrunic is on the Advisory Committee for Sidewalk Labs. From reports in the media (Exhibit K2-2), Sidewalk Labs is proposing an Advanced Power Grid that could cost up to \$510 million and would involve Toronto Hydro.

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The membership of Toronto Hydro in Dr. Petrunic's organization, CUTRIC, raises questions about Dr. Petrunic's independence as witness in a Toronto Hydro proceeding.

According to Rule 13A.02 of the OEB Rules of Practice and Procedure, an expert witness "*...shall assist the Board impartially by giving evidence that is fair and objective.*" It is difficult to see how a paid lobbyist representing the applicant utility in a regulatory proceeding, and commercial interests that hope to profit from the outcome of the decision in the proceeding, could give impartial evidence that is fair and objective.

For these reasons Energy Probe objects to Dr. Petrunic being qualified as an expert witness in this proceeding.

Respectfully submitted on behalf of Energy Probe.

Original Signed by

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Consultant to Energy Probe

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