

August 2, 2019

BY RESS AND COURIER

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli;

RE: EB-2019-0018 Alectra Utilities Corporation (“Alectra Utilities”) 2020 Electricity Distribution (“EDR”) Rate Application

On May 28, 2019, Alectra Utilities filed its 2020 EDR Application with the Ontario Energy Board (“OEB” or the “Board”) for rates and charges effective January 1, 2020. On July 3, 2019, Distributed Resource Coalition (DRC) filed a late request for intervenor status and eligibility for a cost award. In a letter of the same date, Alectra Utilities objected to DRC’s requests on the basis that it had not demonstrated a substantial interest in the application. In Procedural Order No. 1, issued July 9, 2019, the OEB indicated that it would decide on DRC’s requests after the DRC filed a reply to Alectra Utilities’ objection. The OEB noted that DRC intended to file its reply by July 12, 2019. However, DRC did not file its reply until July 26, 2019. The following are Alectra Utilities’ submissions in response to DRC’s July 26, 2019 letter. In addition, as set out below, Alectra Utilities wishes to advise the Board of an additional Applicant Counsel of record in this proceeding.

Alectra Utilities’ objection to DRC’s intervention and cost eligibility request was based on several factors:

- DRC did not demonstrate a substantial interest in the application;
- DRC represents organizations that advocate for policy interests, such as with respect to electric vehicles, CDM and DERs, which are not appropriately considered in a rate proceeding;
- The extent to which DRC’s members comprise Alectra Utilities end users was not clear;
- The specific items in the application that DRC intends to examine were unclear; and
- While the items DRC said it was interested in might arise in a cost of service application, this is not the form of application that Alectra Utilities has filed.

In its July 26, 2019 letter, DRC has indicated that one of its member organizations, the Electric Vehicle Society (“EVS”), has local chapters within three areas of Alectra Utilities’ service territory and that it is estimated that these chapters represent over one-third of EVS’ 1000+ members. It therefore appears from DRC’s submission that there are approximately 300-400 people that are individual electric vehicle (“EV”) owners and that DRC believes to be customers of Alectra

Utilities. DRC further notes that a total of more than 10,000 EV electricity customers are known to be in Alectra Utilities' service territory and, on that basis, DRC argues that it should be granted intervenor status in order to represent the interests of electricity customers of the applicant that are EV owners.

In response, Alectra Utilities submits that customer interests are already well represented by other intervenors in the proceeding. Other than this aspect, DRC has not raised anything new with respect to its intervention in response to Alectra's submissions.

As noted above, Alectra Utilities wishes to add Jonathan Myers as an additional Applicant Counsel of record in this proceeding. Please ensure that he receives copies of materials filed in this proceeding. His contact information is as follows:

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Should you have further questions, please do not hesitate to contact the undersigned.

Yours truly,



Indy J. Butany-DeSouza, MBA
Vice President, Regulatory Affairs
Alectra Utilities Corporation

cc: Charles Keizer, Torys LLP
Jonathan Myers, Torys LLP