

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an application by Oakville Hydro Electricity Distribution Inc. for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2020.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document>
3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

Issues to be Addressed

4. SEC’s intended participation will focus on the following:
 - a. Whether it is appropriate for the Applicant to seek ICM treatment for capital projects in the second year of an extension of Price Cap IR, or whether alternatively the Applicant should be required to file on a cost of service basis (including whether the Applicant’s request for approval to defer rebasing should have included notice of the details of its planned ICM claim);
 - b. The ICM projects and proposed ICM claim, including without limitation whether and/or to what extent the projects qualify, their costs, timing appropriateness, and all other issues relating to those projects, and the calculation of the ICM claim, including all inputs to that calculation;
 - c. The rate impacts of the Application;
 - d. The current and recent regulatory ROE of the Applicant, and all components of that calculation;
 - e. The appropriate application of the Renewed Regulatory Framework and other Board

- policies in the context of this Applicant's situation; and
- f. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearing of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order. SEC reserves the right to seek a determination from the Board that this Application should be rejected without a hearing on the merits, and the Applicant should be required instead to file a cost of service rebasing for the 2020 rate year.

Nature of Hearing Requested

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

Counsel/Representative

7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

- a. School Energy Coalition: (electronic copies only)

ONTARIO EDUCATION SERVICES CORPORATION
c/o Ontario Public School Boards Association
439 University Avenue, 18th Floor
Toronto, ON
M5G 1Y8

Attn: Wayne McNally, SEC Coordinator
Phone: 416 340-2540
Fax: 416 340-7571
Email: wayne.mcnally@oesc-cseo.org

- b. SEC's counsel: (both electronic and paper copies)

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION
2200 Yonge Street, Suite 1302
Toronto, Ontario, M4S 2C6

Attn: Jay Shepherd
Phone: 416-804-2767
Fax: 416-483-3305
Email: jay@shepherdrubenstein.com

with an electronic copy to:

Attn: Mark Rubenstein
Phone: 647-483-0113
Email: mark@shepherd Rubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this September 6, 2019.

Jay Shepherd
Counsel for the School Energy Coalition