

September 16, 2019

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: EB-2019-0022 – Brantford Power Inc. - 2020 Rates

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy Board (“OEB”) by Brantford Power Inc. (“Brantford Power”) for distribution rates effective January 1, 2020. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board’s order in this proceeding will ultimately impact the rates that residential consumers pay for the delivery of electricity.

The Council has reviewed the letter filed by the School Energy Coalition (“SEC”) on September 13, 2019 requesting that the OEB consolidate the Incremental Capital Module (“ICM”) portion of this application with that of the ICM portion of the application brought by Energy + Inc. in EB-2019-0031. The Council agrees with this approach as the ICM applications are for a shared operations facility.

On December 10, 2018, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test the Applicant’s evidence and in particular its request for ICM;
2. To assess any other aspects of the Application that may impact residential consumers; and
3. To participate in the various aspects of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many electricity proceedings over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all correspondence related to this proceeding and hard copies of the Applicant’s evidence should be sent to:

Julie Girvan
62 Hillside Avenue East

Toronto, ON
M4S 1T5
jgirvan@uniserve.com

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: Brantford Power