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October 10, 2019

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON  
M4P 1E4

Dear Ms. Long

**RE: EB-2019-0059 Oakville Hydro 2020 Rate Adjustment Application  
Energy Probe Submission**

In its Procedural Order No.2 the OEB asked that intervenors file any written submissions on the preliminary question of whether it is appropriate for Oakville Hydro to apply for ICM funding as part of its 2020 application with the OEB and serve them on Oakville Hydro and all other parties by October 10, 2019.

Energy Probe believes that it is not appropriate for Oakville Hydro to apply for ICM funding as part of its 2020 application for the following reasons.

In its rebasing deferral letter of January 16, 2019, Oakville Hydro did not inform the OEB that it will be seeking approval for four ICM projects. Had Oakville Hydro informed the OEB of its filing plans, the OEB may not have approved its request for rebasing deferral, particularly as this was the Oakville Hydro's second rebasing deferral.

The four projects for which Oakville Hydro seeks ICM approval are in progress and one is virtually completed. Energy Probe believes that seeking approval for ICM funding of partially completed projects is not in agreement with OEB's ICM guidelines.

Oakville Hydro has not filed a distribution system plan. Lack of a current DSP would not allow the OEB to assess Oakville Hydro's capital needs including the need for potential ICM projects.

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For these reasons Energy Probe believes that the Board should reject Oakville Hydro's request for ICM funding.

Respectfully submitted on behalf of Energy Probe.

*Original signed by*

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Tom Ladanyi  
Consultant to Energy Probe