

ONTARIO ENERGY BOARD

Association of Major Power Consumers in Ontario

**Application to Review Amendments to the Market Rules
made by the Independent Electricity System Operator**

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. SEC notes that in previous market rules reviews, the Board has ordered costs to be paid by the IESO. SEC believes that approach remains appropriate.
4. SEC has a substantial interest in this proceeding. As group representing electricity consumers, it is impacted by the proposed amendments to the market rule to relate to the Transitional Capacity Auction (“TCA”). The intent of the TCA is to increase competition in the procurement of near-term incremental capacity using a market mechanism to lower costs for consumers. Market rules governing the TCA, including the issues raised by Applicant regarding in its view that the market rules should require energy payments to demand response resources, directly affect electricity consumers who will ultimately pay those costs.

Issues to be Addressed

4. SEC’s intended participation will focus on the following:
 - a. Claims by the Applicant that the amendments to the market rules are:
 - i. inconsistent with the purposed of the *Electricity Act*, including among others, “protecting the interests of consumers with respect to price and reliability of electricity service; and

- ii. unjustly discriminatory against demand response resources;
- b. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

- 5. SEC may participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also may 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.

Counsel/Representative

- 6. 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: (**electronic copies only**)

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

Attn: Mark Rubenstein
Phone: 647-483-0113
Fax: 416-483-3305
Email: mark@shepherdrubenstein.com

with an electronic copy to:

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

Respectfully submitted on behalf of the School Energy Coalition this October 11, 2019.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition