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Our File No. 202281

VIA RESS AND EMAIL

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2019-0261: Hydro Ottawa – Distribution Revenue Requirement and Rate Application

1. The Building Owners and Managers Association ("BOMA") seeks intervenor status and cost award eligibility in the above noted proceeding.
2. BOMA is a frequent intervenor in Board proceedings.

Description of the Intervenor and its Membership

3. BOMA represents over 800 Ontario Property and Facility Owners, Managers, Developers, Leasing Agents, and Commercial Real Estate Professionals. Its members account for 80 per cent of all commercial and industrial real estate companies throughout Ontario. BOMA's members are large consumers of electricity throughout the province, and are affected by any changes in Hydro Ottawa's rate and terms of services. As Hydro Ottawa is one of the largest electrical utilities in the Province the Board's decision in this Application may have precedent setting impact on decisions with respect to other utilities across the Province and BOMA members.
4. Over the years, BOMA has been active in protecting and advancing the interests of its members on such important policy issues as energy pricing and supply, property taxes, labour requirements, building materials and equipment regulations. BOMA continues to work at all levels of government providing a voice for Commercial Property owners throughout Ontario.
5. BOMA has been a major and constructive participant in numerous previous cases.

Interest of the Intervenor in the Proceeding and the Grounds for the Intervention

6. BOMA is particularly interested in the following aspects of the proceeding:
- (a) Any proposals included in the Application that may impact commercial, office, retail and institutional consumers;
 - (b) The proposed distribution rates and charges;
 - (c) The proposed methodology used for setting rates for the period 2021-2025;
 - (d) The proposed costs and offsets for the test years, the resulting revenue requirement, the forecast of revenues, and the resulting deficiency;
 - (e) The proposed capital spending plans of the Applicant;
 - (f) The cost allocation and rate design proposed for the collection of the revenue requirement and deficiency from customers;
 - (g) Benchmarking and customer engagement results of the Applicant;
 - (h) Reliability, customer service, and other outcomes achieved and proposed by the Applicant;
 - (i) All requests for creation and/or clearance of deferral accounts, and all other components of the Application;
 - (j) Generally to represent the interests of commercial, office, retail and institutional consumers in this process;
 - (k) Hydro Ottawa Limited (Hydro Ottawa) is seeking to increase rates by more than 4% on average in each year of the 5-year rate plan. The Utility's operating expenses are in excess of inflation and projected to increase by almost 11% as compared to that approved by the Board 4 years ago. The Application seeks to have recovered in rates \$174 million in new net fixed assets including Hydro Ottawa's new service facilities. Among other policy issues are changes to depreciation rates and service agreements with its affiliates. With respect to rate design the Hydro Ottawa proposes to changes to the revenue-to-cost ratios that may have an impact on the consumers BOMA seeks to represent in this proceeding;
 - (l) BOMA is intervening in order to ensure that the interests of electricity consumers, particularly commercial, office, retail and institutional consumers, are fully represented in the delivery of electricity and the determination of just and reasonable rates for that service. BOMA intends to scrutinize all aspects of the Applicant's proposal. Specifically, the relationship between system reliability and capital expenditures, the efficiency of increase costs being sought to be recovered from commercial, office, retail and institutional ratepayers and the cost allocation

and rate design under which these costs are recovered. BOMA will also be seeking to understand the revenue forecasts proposed to underpin rates in this Application.

Nature and Scope of the Intervenor's Intended Participation

7. BOMA intends to participate in all pre-hearing procedures, including such interrogatories, technical conferences, or settlement conference, as the Board may direct. It also intends to participate in any written or oral hearing for which the Board may provide.

Intention to Seek an Award of Costs

8. As a representative of a large sector of energy consumers throughout Ontario, the commercial, office, retail and institutional building owners and managers, BOMA seeks a cost award in this proceeding.

Addresses of Representatives

9. BOMA requests that further communications with respect to this matter be sent to the following representatives in electronic form only:

Thomas Brett, Partner	Albert Engel, Partner	Marion Fraser, President
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BOMA respectfully requests your acceptance of this intervention and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

AME/dd

cc: Shuo Zhang, OEB (*via email*)
Gregory Van Dusen, Hydro Ottawa (*via email*)
Fred Cass, Aird & Berlis (*via email*)
Marion Fraser, Fraser & Company (*via email*)
Bala Gnanam, BOMA (*via email*)