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April 21, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Long

**RE: EB-2019-0261 Hydro Ottawa Limited 2021-2025 Rates Application
Energy Probe Late Intervenor Request Letter**

Energy Probe Research Foundation (Energy Probe) applies for late intervenor status in the EB-2019-0261 proceeding, the application by Hydro Ottawa Distribution Inc. to the Ontario Energy Board for approval of electricity distribution rates for the 2021-2025 period. Energy Probe apologizes for the late intervention and hopes that the OEB and the applicant will accept it.

Energy Probe attended the June 11, 2019 Hydro Ottawa Presentation Day and expected to be notified of the filing of the application. However, the OEB's Letter of Direction of March 4, 2020 directed Hydro Ottawa to only notify the EB-2015-0004 intervenors and did not mention the Presentation Day participants. Energy Probe was not an intervenor in the EB-2015-0004 proceeding and was not notified of the application.

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its electricity residential customer supporters, which we have some number of thousands. Energy Probe expects that it will focus on the following parts of the application:

- The proposed Custom IR rate setting formula and the Custom Performance Scorecard
- The Load Forecast for 2021 to 2025,
- The Distribution System Plan and the forecast of capital expenditures for 2021 to 2025,

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org

- OM&A expenditures and Productivity Initiatives,
- Revenue to Cost ratios and Rate Design,
- The balances in Deferral and Variance Accounts and the proposed disposition.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe plans to be an active participant in the hearing, whether it is in an oral or written form.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor Request Letter, including but not limited to all documents filed with the Board by the applicant and required by Energy Probe, should be directed to consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com
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Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant representing Energy Probe

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6