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June 1, 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:** Energy Probe Research Foundation – Intervenor Annual Information Submission Pursuant to Rule 22.03 (b) of OEB Rules of Practice and Procedure

### ENERGY PROBE RESEARCH FOUNDATION

Energy Probe Research Foundation (Energy Probe) is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It has long been one of Canada's leading environmental and public policy research institutes, cited as one of the most effective organizations of its kind by The Canadian Encyclopedia. Energy Probe first took form in 1970 as the Energy Team of Pollution Probe. In 1980, Energy Probe separated from Pollution Probe and became incorporated as the Energy Probe Research Foundation.

It has four main goals:

- 1) to provide the public, media, business, and government with information on resource-related issues;
- 2) to promote sustainable resource use;
- 3) to encourage individual responsibility and accountability; and
- 4) to help Canada contribute to global justice and prosperity.

To inform public opinion, Energy Probe has been a founder of numerous organizations: locally, Ecology House and Lake Ontario Water Keeper; nationally, Friends of the Earth Canada; and internationally, the World Rainforest Movement and the International Rivers Network. Energy Probe has several distinct divisions including Probe International, Environment Probe, Consumer Policy Institute, and the Urban Renaissance Institute.

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

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

Energy Probe argues for the break-up of unnatural monopolies, created by political or regulatory decree. Where natural monopolies exist, Energy Probe advocates for regulation that is mandated to protect the interests of consumers.

Energy Probe works to protect all ratepayers by ensuring the integrity of regulatory systems and the strict enforcement of laws. To eliminate biases and conflicts of interest, and to ensure that public- and private-sector interests are treated equally, it advocates independent regulators, who are subject to due process and judicial review, and regulatory processes that require full disclosure of information.

Energy Probe relies on individual donations to help protect the public interest. It does not receive any direct or indirect financial support from any energy utility or union.

### **Membership**

The membership of Energy Probe consists of its Board of Directors, shown on our letterhead above, and its employees, plus former members of the Board of Directors and former employees for an additional five years. Current Board Members and employees reside in Ontario while former Board Members and employees are more widespread, although primarily in Canada. Several Board Members of Energy Probe instruct at the university level, including specialities in economics which cover the economics of electricity generation and distribution. One Board Member is a columnist for a national newspaper and at times comments on energy matters.

### **Statement of Interest**

Energy Probe is a non-profit environmental and consumer organization that promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters who have broad concerns with respect to the overall financial health and operational integrity of our utilities. Unlike other intervenors, whose members expect them to argue for lower rates for their particular ratepayer class, Energy Probe's members expect it to argue for equitable rates that optimize results across all ratepayers classes, by eliminating cross subsidies among the various ratepayer classes. This approach – unique to Energy Probe among all intervenors before the Board – fulfills its mandates to promote individual responsibility and accountability (i.e., our members don't want to profit at the expense of others) as well as to inform all parties (the general public, business and government among them) in order to promote sustainable resource use.

Through the services Energy Probe provides to the many members of the public who contact it with concerns over energy rates, through its speeches to community organizations concerned with wind projects or transmission lines, through presentations to high school and university students in Ontario, through studies on the power sector by its board members and staff, and through media appearances, Energy Probe is a non-profit organization that general members of the public rely on to satisfy their concerns. In fulfilling this role, Energy Probe will be intervening on issues that it believes to be in the interests of its members, of residential ratepayers, and ultimately of all ratepayers.

Energy Probe draws its support from citizens of all political parties, according to past polls, and they tend to be well educated, according to Alexa metrics. Its supporters' main interest lie in electricity and gas rates, followed by other economic concerns as well as environmental and safety concerns. Some 4,000 supporters subscribe to its newsletters; many more follow Energy Probe through its blogs and regular

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articles in the mainstream press. Its website has consistently been the province's most active energy policy website.

As for Energy Probe representing a policy interest or perspective relevant to the Board's mandate, it has often been the originator of major policies that became Board policy. For example, Energy Probe was initially alone in arguing, successfully, that natural gas deregulation should apply to residential customers. Energy Probe was alone for several years in recommending that the Board adopt incentive regulation and decoupling. It alone made repeated submissions that residential customers be offered the choice of fixed contracts rather than being subject to the fluctuations of the marketplace. Energy Probe promoted time of use pricing long before it was adopted and, of course, it was Energy Probe that argued that the power sector be subject to full regulation, rather than mere review.

In several cases Energy Probe offered perspectives that the Board did not find persuasive. Nevertheless, by challenging the prevailing consensus, Energy Probe believes that the Board's ultimate decisions were better informed and represented a better compromise among the competing perspectives.

Apart from these major issues, Energy Probe also initiated discussions that led to numerous minor reforms. It is fair to say that Energy Probe initiated more significant regulatory policies in the Ontario gas and electricity sector than any other party.

### **Energy Probe Regulatory Representation**

The following individuals, none of whom are members of Energy Probe, act as Energy Probe's representatives and consultants in OEB regulatory proceedings:

Tom Ladanyi M.A.Sc., P.Eng., CPA, CMA – Consultant and Case Manager  
TL Energy Regulatory Consultants Inc.

Roger Higgin Ph.D. MBA, P.Eng. – Consultant  
Sustainable Planning Associates (SPA) Inc,

Larry Schwartz Ph.D. - Consultant  
Consulting Economist

Energy Probe will update its information as required by Section 3.03.1. of the Practice Direction on Cost Awards.

Yours truly,

*Original signed by*

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Patricia Adams

President, Energy Probe Research Foundation

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