



---

## THE BOARD OF DIRECTORS

PATRICIA ADAMS  
Chair and President  
ANN CAVOUKIAN  
Executive Director, PBID, Ryerson University  
ANDREW COYNE  
Columnist, Globe and Mail  
IAN GRAY  
President, St. Lawrence Starch Co. Ltd.  
GAIL REGAN  
President, Cara Holdings Inc.  
GEORGE TOMKO  
Expert-in-Residence in IPSI, University of Toronto

MAX ALLEN  
Producer, CBC Radio  
DAVID CAYLEY  
Writer and Broadcaster  
GLENN FOX  
Economist, University of Guelph  
BRUCE PARDY  
Professor of Law, Queen's University  
ANDREW ROMAN  
Lawyer

September 21, 2020

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

Dear Ms. Long,

**RE: EB-2020-0002 Alectra Utilities 2021 Rates Application  
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2020-0002 proceeding, the application by Alectra Utilities to the Ontario Energy Board for the approval of its 2021 rates.

**Statement of Interest**

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website.

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

Energy Probe's interest in this proceeding is the impact on customers of the Incremental Capital Funding requests by Alectra Utilities. Energy Probe will focus on the purpose, the need, the timing, the cost estimates, and the eligibility for ICM treatment of the capital expenditures for which Alectra Utilities is seeking incremental funding from customers.

---

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

## **Hearing**

Energy Probe hopes that all ICM related issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required on ICM issues, Energy Probe believes that it can be in written form if Alectra provides adequate information on ICM projects in the discovery part of the proceeding. Energy Probe will only participate in the hearing on ICM issues.

## **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 and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultant:

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
41 Divadale Drive  
Toronto ON  
M4G 2N7  
Tel: 416 423-3685  
[tom.ladanyi@rogers.com](mailto:tom.ladanyi@rogers.com)

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
Consultant representing Energy Probe

cc. Indy Butany-DeSouza (Alectra Utilities Corporation)  
Charles Keizer (Torys LLP)  
Patricia Adams (Energy Probe Research Foundation)

**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)