

October 13, 2020

Ms. Christine E. Long
Board Secretary and Registrar
Ontario Energy Board
27th Floor/ P.O. Box 2319
2300 Yonge St.
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: 2021 Cost of Service Electricity Distribution Rate Application – Objection to Intervenor Requests by Vulnerable Energy Consumers Coalition and Energy Probe Foundation Halton Hills Hydro Inc.,

Board File no. EB-2020-0026

Halton Hills Hydro Inc. objects to the request for Intervenor Status submitted by Vulnerable Energy Consumers Coalition ("VECC") on October 7, 2020 and Energy Probe Foundation ("Energy Probe") on October 8, 2020. Halton Hills Hydro Inc. objects based on the grounds that VECC and Energy Probe do not have distinct interests and request the Ontario Energy Board grant intervenor status to only one of either VECC or Energy Probe. If the Ontario Energy Board does grant intervenor status to both VECC and Energy Probe, Halton Hills Hydro Inc. requests the Ontario Energy Board consider limiting cost awards given the size of Halton Hills Hydro Inc. and the five (5) intervenor requests.

Additionally, Halton Hills Hydro Inc. would note that the intervention document submitted by VECC indicates that one of the grounds for intervention is "that the Applicant is proposing to use of [sic] Utilities Standard Forum load profiling model in this application". While Halton Hills Hydro Inc. has mentioned the Utilities Standard Forum load profiling model in the EB-2020-0026 application, Halton Hills Hydro Inc., on page 5 of Exhibit 7, actually stated,

"HHHI is a member of Utilities Standards Forum ("USF"). Currently, a USF member is bringing forth a USF load profiling model in their 2021 COS application. HHHI expects the OEB will thoroughly vet the USF model during the COS process. HHHI intends to utilize the USF load profile model, with any necessary revisions that arise from the COS process, at its next COS",



As such, VECC's specific reference to the use of the Utilities Standard Forum load profiling model as grounds for intervention is not valid.

In the event of any additional information, questions or concerns please contact Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, at tracyr@haltonhillshydro.com or (519) 853-3700 extension 257, or David Smelsky, Chief Financial Officer, at dsmelsky@haltonhillshydro.com or (519) 853-3700 extension 208.

Sincerely

David J. Smelsky, CPA, CMA, C. Dir.

Chief Financial Officer, HHHI

Cc: Arthur A. Skidmore, President & CEO, HHHI

R. King, Osler, Hoskin & Harcourt LLP Individuals authorized to represent VECC

Energy Probe consultants

Participants in OEB proceeding EB-2020-0026