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October 15, 2020

VIA E-MAIL

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Long:

**Re: EB-2020-0026 - Halton Hills Hydro Inc. (HHI) 2021 Cost of Service Rates
Response to intervention objection**

We are in receipt of a letter objecting to VECC's participation in the HHI's current cost of service application EB-2020-0026. The grounds provided are:

"... 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."

The Utility does not raise objections to the interventions of the Hydro One Networks, the School Energy Coalition (SEC), or the Distributed Resource Coalition (DRC). Nor does the HHI request that the latter two also seeking cost eligibility be subject to limitations on cost awards.

It is not for VECC to speak to the interests of Energy Probe. VECC's interest with low-income consumers is associated with its representation of the Federation of Metro Tenants Association (FTMA) and the Ontario Coalition of Senior Citizens' Organizations (OCSCO). As the Board knows from recent proceedings FTMA represents customers outside of the Greater Toronto Area and across the Province. VECC's view is that its interests, as a representative of low-income ratepayers and seniors, are uniquely different from any party seeking intervention in this proceeding. As HHI only speculates as to the overlap between the interests of Energy Probe and ourselves it is difficult to respond to their objection in the specific.

As for the matter of limiting the cost awards of a subset of intervenors based on the Applicant's conjecture as to a party's overlapping interest, we would say that the idea not only lacks merit but also ignores the long-standing expectation of the Board for parties to work together where they can find efficiencies. We think the Board expects this of SEC and DRC and any other party it grants intervention

to in this proceeding. Consistent with the philosophy of the customers it tries to represent, VECC is generally among the lowest cost intervenor in these types of proceedings. We are confident in the Board's ability to determine costs based on the value of a party's participation.

HHHI is also critical of VECC's specific interest in the USF load profiling noting that the issue will only be of interest in its next cost of service application. This, of course, may or may not be the situation. Whatever the case potential intervenors are not required to provide a detail critique of the application in order to demonstrate their interests. Doing so would require significant time and resources. VECC attempts to meet what it understands to be the Board's requirement which is to demonstrate there are matters which might affect its interests. It is not to make an exhaustive study of the application and to argue its point as part of an intervention request.

Finally, VECC would note that it was accepted as an intervenor in HHHI' prior cost of service proceeding EB-2015-0074.

We would ask that the Board grant VECC's intervention and award costs in the same way as it may for any other cost eligible intervenor.

Yours truly,

John Lawford

Counsel for VECC

Email copy:

David Smelsky, Chief Financial Officer, HHHI Chief Financial Officer
dsmelsky@haltonhillshydro.com