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December 4, 2020

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

Dear Ms. Long,

**RE: EB-2020-0007 Burlington Hydro 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-2020-0007 proceeding, the application by Burlington Hydro Inc. to the Ontario Energy Board for the approval for 2021 rates effective May 1, 2021.

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

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The interest of Energy Probe in this proceeding is the impact on ratepayers, including its supporters, of the OEB approvals requested by Burlington Hydro. In that regard Energy Probe will focus its interest on the following parts of the application:

- customer engagement
- the 2021 Revenue Requirement including capital and OM&A expenditures,
- affiliate transactions,
- the 2021-2025 Distribution System Plan and the Asset Condition Assessment
- the proposed disposition of large balances in the deferral and variance accounts,
- the true-up of costs associated with the Tremaine TS
- the reliability performance targets,
- the load forecast including the effect of COVID-19, and
- the level of cross-subsidies between rate classes.

Form of Hearing

Considering the amount of evidence filed by Burlington Hydro, Energy Probe submits that a written hearing could be an appropriate regulatory process if it includes the following steps:

- interrogatories,
- technical conference,
- responses to undertakings from the technical conference,
- settlement conference, and, if necessary,
- submission of written arguments.

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 consultants:

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

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Respectfully submitted on behalf of Energy Probe.

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

cc. Patricia Adams (Energy Probe Research Foundation)
Sally Blackwell (Burlington Hydro Inc.)
Roger Higgin (Sustainable Planning Associates Inc.)
Shuo Zhang (OEB Staff)