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December 9, 2020

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

Dear Ms. Long,

**RE: EB-2020-0150 Upper Canada Transmission 2022 -2031 Custom IR 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-2020-0150 proceeding, the application by Upper Canada Transmission Inc. (UCT) operating as NextBridge Infrastructure LP for its 2022-2031 Custom Incentive Rate-setting proposal.

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

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

In this proceeding UCT is seeking approvals that would increase the uniform transmission rate paid by electricity ratepayers including the supporters of Energy Probe. Therefore, Energy Probe has a direct interest in the following issues in this proceeding:

- OM&A costs including compensation and purchases of services from affiliates and other parties
- Capital expenditures and the Asset Management Plan
- Additions to rate base including a prudence review of past capital expenditures
- Capitalization Policy including the capitalization of overhead costs
- Services Agreements with Affiliates and Partners
- Financial transactions with Affiliates and Partners
- The Custom IR Plan
- The performance scorecard including reliability targets

Hearing

Energy Probe believes that a written hearing consisting of a single round of interrogatories followed by the submission of arguments would not result in an adequate evidentiary record for the OEB to reach a decision on the issues in this case. Considering the evidence filed by UCT and its importance, Energy Probe submits that an appropriate regulatory process should include the following steps:

1. interrogatories,
2. technical conference (virtual),
3. responses to undertakings from the technical conference,
4. settlement conference, and
5. 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.

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

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:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com
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Respectfully submitted on behalf of Energy Probe.

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

cc. Jennifer Tidmarsh (NextBridge Infrastructure LP)
Patricia Adams (Energy Probe Research Foundation)
Roger Higgin (Sustainable Planning Associates Inc.)