

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application by Ontario Power Generation Inc. for an order or orders approving payment amounts for prescribed generating facilities commencing January 1, 2022.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document>

3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

Issues to be Addressed

4. SEC’s intended participation will include the following:
 - a. The proposed methodology used for setting payment amounts for the period beginning January 1, 2022 to December 31, 2026;
 - b. The proposed costs and offsets for the test years, the resulting revenue requirement, the forecast of revenues, and the resulting deficiencies;
 - c. Benchmarking results of the Applicant;
 - d. The proposed nuclear capital spending plans of the Applicant, including the Darlington Refurbishment Program, and the interaction between those capital spending plans, deferral/variance accounts, and applicable regulations;
 - e. The cost allocation, calculation, and payment amount smoothing proposal design, proposed for the collection of the revenue requirement and deficiency from customers;
 - f. Implementation of OEB directives and orders from previous OPG proceedings;
 - g. All requests for creation and/or clearance of deferral accounts, and all other components of the Application; and
 - h. Generally, to represent the interests of school boards and their students in this process.

The Intervenor’s Intended Participation

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearings of

this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order. Until it has reviewed the application in full, and depending on the responses to interrogatories and any other discovery processes ordered by the Board, SEC reserves its right to file evidence,

Nature of Hearing Requested

6. Until interrogatories have been answered, we believe it is premature to assess whether any of the application should be heard in a written as opposed to an oral hearing.

Counsel/Representative

7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

- a. School Energy Coalition: (electronic copies only)

ONTARIO EDUCATION SERVICES CORPORATION
c/o Ontario Public School Boards Association
439 University Avenue, 18th Floor
Toronto, ON
M5G 1Y8

Attn: Wayne McNally, SEC Coordinator
Phone: 416-340-2540
Fax: 416-340-7571
Email: wayne.mcnally@oesc-cseo.org

- b. SEC's counsel: (electronic copies only)

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION
2200 Yonge Street, Suite 1302
Toronto, Ontario, M4S 2C6

Attn: Mark Rubenstein
Phone: 647-483-0113
Fax: 416-438-3305
Email: mark@shepherdrubenstein.com

With an electronic copy to:

Attn: Jay Shepherd
Phone: 416-804-2767
Email: jay@shepherdrubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this January 27, 2021.

Mark Rubenstein
Counsel for the School Energy Coalition