

Ms. Christine Long  
OEB Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

April 6, 2021

**Re: EB-2018-0278 Activity and Program-based Benchmarking (APB) Initiative  
Pollution Probe Participation Request Letter**

Dear Ms. Long:

Pollution Probe is in receipt of the OEB letter dated March 30, 2021 for the above noted consultation and requests participant status and that it be eligible for the recovery of reasonably incurred costs for its participation.

**Goals and Objectives**

Pollution Probe has been an active participant in rate proceedings, including rebasing applications where there has been efforts to implement effective scorecards and continuous improvement in a balanced manner to provide cost-effective long-term outcomes to meet utility, consumer and community needs. The Activity and Program-based Benchmarking (APB) report and related stakeholder consultation is directly related to these proceedings and could provide some opportunity to leverage more consistent benchmarking to drive utility performance. Effective portfolio metrics can also help validate the benefits over time related to an effective distribution asset plan.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of our current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

**Intention to Seek Cost Awards**

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, industry benchmarking and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible.

Pollution Probe has been an active and valuable participant in proceedings before the Ontario Energy Board and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, municipal and environmental interests in Ontario.



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Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

**Notice**

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy  
Consultant for Pollution Probe  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA  
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Consultant to Pollution Probe  
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Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

cc: All Licensed Electricity Distributors (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via e-mail)