



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

June 4, 2021
Our File: CO20200015

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2021-0039 – Lakefront Utilities Inc. 2022 Rates – NHH Notice of Intervention

We are counsel to Northumberland Hills Hospital (“NHH”). Attached, please find NHH’s notice of intervention in the above-captioned matter.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: NHH (by email)
Applicant (by email)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B, as amended;

AND IN THE MATTER OF an application by Lakefront Utilities Inc. for an Order or Orders approving or fixing just and reasonable distribution rates effective January 1, 2022.

NOTICE OF INTERVENTION

OF THE

NORTHUMBERLAND HILLS HOSPITAL

1. Northumberland Hills Hospital (“NHH”) hereby applies for intervenor status in this proceeding, and requests that the Board allow recovery of its reasonably incurred costs of its participation.

Interest of the Intervenor

2. NHH is a hospital that that serves west Northumberland County and delivers a broad range of acute, post-acute, outpatient, and diagnostic services to patients.
3. NHH is an electricity distribution customer of Lakefront Utilities Inc. (the “Applicant”) and currently owns and operates a 287kW combined heat and power (“CHP”) generation facility. NHH would be directly affected by the application, including the proposed standby charge.

Issues to be Addressed

4. NHH’s intended participation will primarily focus on the Applicant’s proposed standby charge.

The Intervenor's Intended Participation

5. NHH intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. Further, depending on the responses to interrogatories, NHH may elect to file evidence. NHH proposes that to promote efficiency and to reduce overall costs, the Board defer the process of any intervenor evidence until after the completion of the scheduled settlement conference.

Nature of Hearing Requested

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

Costs

7. NHH applies for recovery of its reasonably incurred costs in the course of its intervention in this matter pursuant to the *Practice Direction on Cost Awards* (“Practice Direction”). NHH is customer of the Applicant and eligible for an award costs pursuant to section 3.03(a) of the Practice Direction. NHH was previously deemed eligible to apply for an award of costs in the Applicant’s 2019 IRM proceeding (EB-2018-0049).

Counsel/Representative

8. NHH 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. Northumberland Hills Hospital: (electronic copies only)

NORTHUMBERLAND HILLS HOSPITAL

1000 DePalma Dr.
Cobourg, ON K9A 5W4

Attn: Linda Davis, President and CEO

Phone: 905-372-6811 ext. 4005

Email: ldavis@nhh.ca

Attn: Elizabeth Vosburgh, Sr. Vice President Corporate Services

Phone: 905-377-7759

Email: evosburgh@nhh.ca

Attn: Chuck Cudmore, Director of Maintenance & Redevelopment

Phone: 905-372-6811 ext. 6811

Email: ccudmore@nhh.ca

- b. NHH’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: 416-483-3305

Email: mark@shepherdrubenstein.com

Respectfully submitted on behalf of Northumberland Hills Hospital, June 4th, 2021.

Mark Rubenstein
Counsel for NHH