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July 9, 2021

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

Dear Ms. Long,

**RE: EB-2021-0169 – Hydro One Networks Inc. Request for an Accounting Order for a
Regulatory Account for Affiliate Transmission Projects
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-2021-0169 proceeding, the application by Hydro One Networks Inc. to the Ontario Energy Board for the approval of its request for an accounting order for affiliate transmission projects.

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 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's interest in this proceeding is its concern regarding the impact on electricity ratepayers, including its supporters, of potential cross subsidies of affiliate projects by Hydro One's ratepayers. Should the OEB approve the Accounting Order requested by Hydro One, Energy Probe believes that it should put in place appropriate safeguards to protect electricity

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ratepayers from cross subsidizing affiliate projects. Such safeguards may include rules for the allocation of common costs, transfer pricing and financial support.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe plans to be an active participant in the hearing, whether it is in an oral or written form.

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 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:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin Sustainable Planning Associates Inc. 15 Malabar Place Don Mills, Toronto ON 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.

cc. Patricia Adams (Energy Probe Research Foundation)
Tracy Garner (OEB Staff)
Roger Higgin (Sustainable Planning Associates Inc.)
Joanne Richardson (Hydro One)

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