

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Canadian Niagara Power Inc. for an Order or Orders pursuant to section 78 of the Act, approving or fixing just and reasonable distribution rates effective January 1, 2022 and related matters.

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 costs and offsets for the test years, the resulting revenue requirement, the forecast of revenues, and the resulting deficiency;
 - b. The proposed capital spending plans of the Applicant;
 - c. The cost allocation and rate design proposed for the collection of the revenue requirement and deficiency from customers;
 - d. Benchmarking and customer engagement results of the Applicant;
 - e. Reliability, customer service, and other outcomes achieved and proposed by the Applicant;
 - f. All requests for creation and/or clearance of deferral accounts, and all other components of the Application; and
 - g. 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. While SEC does not currently intend to file evidence in this proceeding, it reserves its right to do so depending on the responses to interrogatories and any other discovery processes ordered by the Board.

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.

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: Ted Doherty, Executive Director
Phone: 416-340-2540
Fax: 416-340-7571
Email: SEC@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: Fred Zheng
Phone: 647-483-0114
Email: fred@shepherdrubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this August 3, 2021.

Mark Rubenstein
Counsel for the School Energy Coalition