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September 9, 2021

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

Dear Ms. Long,

**RE: EB-2021-0110 Hydro One Networks 2023-2027 Transmission and Distribution
Rates Application
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in EB-2021-0110, the application by Hydro One Networks Inc. to the Ontario Energy Board for the approval its 2023 to 2027 Transmission and Distribution Rates.

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 residential 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 Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org

The interest of Energy Probe in this proceeding is the impact on ratepayers, including its supporters, of the proposed 2023 - 2027 Transmission and Distribution rates. In that regard Energy Probe will focus on the following areas of concern.

- The proposed Custom IR including the supplemental stretch factor, the productivity factor, and the C-factor together with the proposed Capital in Service Variance Account and their impact on incentives for capital productivity.
- The Distribution System Plan and the Transmission System Plan, pacing of capital investments and trade-offs between spending on maintenance and spending on capital including the use of repair or replace analysis in capital spending decisions.
- The proposed plans for staffing, compensation, and benefits.
- The allocation of shared assets and the capitalization of common corporate costs.
- The proposed disposition of regulatory accounts including the accounts of the Acquired Utilities.
- The Distribution and Transmission load forecasts.
- The proposed new rate classes for the Acquired Utilities.

Form of Hearing

Energy Probe supports the request by Hydro One for an oral hearing.

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 very 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.

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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 its 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)
Roger Higgin (Sustainable Planning Associates Inc.)
Hydro One (Regulatory Affairs)