

# Elson Advocacy

**BY EMAIL AND RESS**

September 23, 2021

**Ms. Christine Long**

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0110 – Custom IR Application (2023-2027) for Hydro One  
Networks Inc. Transmission and Distribution**

We are writing on behalf of Environmental Defence to request intervenor status and costs eligibility in the above proceeding. Environmental Defence seeks intervenor status and costs eligibility as a leading environmental organization that represents both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through increased energy efficiency, reduced line losses, cost-effective non-wires alternatives, and other means that benefit the environment and lower electricity costs at the same time.

## **Late Intervention Request**

This intervention request is being submitted after the deadline because Hydro One inadvertently did not serve Environmental Defence with the hearing notice. We respectfully request that intervenor status be granted despite this because:

- The delay was due to inadvertence on behalf of Hydro One and not due to any mistake on the part of Environmental Defence or its counsel;
- Hydro One indicated that it will not object to this late intervention request;
- Approving this request will not cause any delay or require any changes to the schedule;
- Environmental Defence has acted diligently throughout and moved to file this intervention request expeditiously as soon as Hydro One provided its late hearing notice to us; and
- This will not cause prejudice to any party.

## **Nature and Scope of Intended Participation and Interest in Proceeding**

Environmental Defence wishes to file interrogatories, participate in the hearing, review and test the evidence, make submissions, and seek a cost award. Environmental Defence's interest in this proceeding is in promoting both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through means described above. Environmental Defence wishes to address important issues such as:

- Whether Hydro One is taking appropriate steps to cost-effectively reduce transmission and distribution system losses;
- Whether Hydro One is taking appropriate steps to reduce transmission and distribution infrastructure costs through non-wires alternatives;
- Whether Hydro One is taking appropriate steps to facilitate the implementation of distributed energy resources that can provide benefits to customers and to Ontario's electricity generation, transmission, and distribution systems, including through its responses to connection requests;
- Whether Hydro One is adequately planning for a variety of potential scenarios for the electrification of transportation and space/water heating;
- Whether Hydro One is taking appropriate proactive steps to reduce the impact of electric vehicle expansion on system peak demand;
- And other issues relating to the mandate of Environmental Defence to be determined after a more detailed review of the evidence, interrogatory responses, and other materials.

## **Environmental Defence**

### *A. Mandate and Objectives of Environmental Defence*

Environmental Defence has been working since 1984 to protect Canadians' environment and human health. Environmental Defence's mandate and objective is to challenge, and inspire change in government, business and people to ensure a greener, healthier and prosperous life for all. Its vision is to create a world Canadians are proud to pass on to their children.

### *B. Membership and Constituency*

Environmental Defence is supported by many thousands of donors across the province and country. It sees its constituency as Canadians who are concerned about the environment and the legacy that we will pass on to our children.

### *C. Types of Programs and Activities that Environmental Defence Carries Out*

Environmental Defence has been highly successful in its public interest advocacy on energy issues. Environmental Defence's environmental work, on issues ranging from toxic chemicals to

clean beaches, has led to concrete improvements in the lives of Canadians. For example, the dangerous chemical Bisphenol A (“BPA”) is now banned in baby bottles in Canada due to concerns first raised by Environmental Defence in 2007. For many years, Environmental Defence has participated in the federal government’s Chemicals Management Plan.

Environmental Defence is also the coordinator of Blue Flag Canada, which certifies beaches so that Ontario families can enjoy this public resource. It also co-founded Blue Green Canada with the United Steelworkers, which promotes green energy initiatives that have positive employment and economic impacts.

Environmental Defence also publishes reports and guides in the area of energy conservation, efficiency, and policy. For example, it has created an interactive online tool to help energy consumers reduce their bills through energy efficiency initiatives. Some further publications include:

- *Building an Ontario Green Jobs Strategy*
- *Ontario’s Electricity System, a Backgrounder*
- *Canada’s Methane Gas Problem: Why strong regulations can reduce pollution, protect health, and save money*
- *Powering up efficiency to get the conservation framework right*
- *The \$2 Billion Question - How Can Ontario Reinvest Cap-and-Trade Proceeds to Meet its Climate Challenge and Grow the Economy?*
- *What to Look for in the Canadian Energy Strategy*
- *Backgrounder - Coal and Renewable Energy in Ontario*
- *Building Ontario’s Green Economy: A Road Map*
- *Ontario Feed-In Tariff: 2011 Review*
- *The Global Clean Energy Jobs Race: Ontario’s Opportunity*
- *Blowing Smoke: Correcting Anti-Wind Myths in Ontario*
- *Faces of Transformation: Jobs, economic renewal and cleaner air from Year*
- *One of Ontario's Green Energy Act*
- *Falling Behind: Canada's Lost Clean Energy Jobs*
- *Greening Canada's Building: Report Card*

These and other reports can be found at <http://environmentaldefence.ca/reports/>.

### **Requests for Evidence and Addresses of Representative**

Environmental Defence requests that electronic copies of the pre-filed materials and all other documents in the proceeding be delivered to the following consultant and counsel:

Electronic copies to:

**Jack Gibbons**  
 Ontario Clean Air Alliance  
 160 John Street, Suite 300  
 Toronto, Ontario M5V 2E5

Tel: (416) 260-2080 ext. 2  
E-mail: jack@cleanairalliance.org

Electronic copies to:

**Elson Advocacy**

**Kent Elson**

**Amanda Montgomery**

1062 College Street, Lower Suite

Toronto, Ontario M6H 1A9

Tel: (416) 906-7305

Fax: (416) 763-5435

E-mail: kent@elsonadvocacy.ca/amanda@elsonadvocacy.ca

We also request that the above individuals be listed on the intervenors' list under Environmental Defence.

**Address of Environmental Defence**

Environmental Defence's full name and address is:

**Environmental Defence Canada Inc.**

116 Spadina Avenue, Suite 300

Toronto, Ontario M5V 2K6

Tel: (416) 323-9521

Fax: (416) 323-9301

However, please send correspondence and any other materials to both Jack Gibbons and to counsel as the authorized representatives.

**Service on other Parties**

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,



Kent Elson