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October 1, 2021

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

Attention: Christine Long, Registrar

Dear Ms. Long:

**Re: Board File No. EB-2021-0110
Custom IR Application (2023-2027) for Hydro One Networks Inc. Transmission and Distribution**

Willms & Shier Environmental Lawyers LLP is counsel for the Ontario Sustainable Energy Association (“OSEA”).

OSEA is in receipt of Hydro One Networks Inc.’s (“HONI”) application for approval of a custom incentive rate-setting framework for its Transmission and Distribution businesses, beginning on January 1, 2023 and ending on December 31, 2027.

OSEA seeks intervenor status and cost eligibility in this matter. We apologize for submitting this intervention request after the deadline, and respectfully request that the Board consider OSEA’s intervenor request despite the delay.

Approving OSEA’s intervention request will not (i) prejudice any party, (ii) delay the proceeding, or (iii) alter the schedule set out in Procedural Order 1 dated September 17, 2021.

To ensure that the proceeding is not delayed, if granted intervenor status, OSEA will not make submissions with respect to any items in Procedural One with deadlines that have passed.¹ OSEA will meet all upcoming deadlines, and agrees not to seek any extensions.

¹ OSEA will not participate in EB-2021-0243, make submissions on the need for a blue page update, make submissions on the request for the confidential treatment of the Appendix, or make submissions on HONI’s letter regarding provisions for reply on expert evidence.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA's members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide "an important and unique perspective" in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on HONI's application.

COST ELIGIBILITY

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about HONI's application.

OSEA can continue to provide an important and unique perspective in the current proceeding. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of

sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable low carbon energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, energy efficiency, renewable energy generation, or by lowering their greenhouse gas ("GHG") emissions. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies and in fact, is technology agnostic.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation, renewable energy, and energy efficiencies.

OSEA's mandate on energy conservation and sustainable energy relates to HONI's application for approval of a custom incentive rate-setting framework for its Transmission and Distribution businesses. OSEA participated in the proceeding about HONI's 2018-2022 distribution rates application (EB-2017-0049).

OSEA interests in this proceeding include understanding how HONI's application will:

- ♦ reduce GHG emissions within the HONI system, including how proposed investments will enable customers to reduce their GHG emissions
- ♦ support community energy plans and small scale renewable generation, and
- ♦ support energy efficiency and other Conservation Demand Management ("CDM") initiatives.

REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

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Yours truly,



Joanna Vince
Partner
*Certified as a Specialist in Environmental Law
by the Law Society of Ontario*

cc: Dan Goldberger, OSEA

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