



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

BY EMAIL

October 25, 2021

Joanna Vince  
Willms & Shier Environmental Lawyers LLP  
1 Toronto Street  
Suite 900  
Toronto ON M5C 2V6  
[jvince@willmsshier.com](mailto:jvince@willmsshier.com)

Dear Ms. Vince:

**Re: Request for Intervenor Status and Cost Eligibility  
Hydro One Networks Inc. (Hydro One)  
2023-2027 Transmission and Distribution Joint Rate Application  
Ontario Energy Board File Number: EB-2021-0110**

This letter is in response to your letter dated October 1, 2021, filed on behalf of the Ontario Sustainable Energy Association (OSEA), requesting intervenor status and cost eligibility in the above proceeding.

OSEA's intervention request was filed after the September 14, 2021 deadline for requesting intervenor status and cost eligibility had passed. OSEA stated that if it is accepted as an intervenor it will accept the record as it stands.

In its letter of intervention OSEA stated that it "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" and it "aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy." OSEA stated that its "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.”

On October 6, 2021, Hydro One filed a letter objecting OSEA’s intervention request. Hydro One stated that it questions the incremental contribution that OESA can make given that the groups OSEA advocates for are already represented by other intervenor groups. Hydro One also stated that this rate application is not an “appropriate forum” to address the issues that OESA wishes to pursue which are “primarily policy issues driven by government, and largely pertain to the generation of electricity, not delivery.” Hydro One stated that if OSEA is approved as an intervenor, that the OEB “delineate a reasonable scope for the issues OSEA wishes to raise as part of this application and that OSEA should as a condition of any cost award demonstrate as to how it worked with others to eliminate overlap and make contributions that were reasonable in scope.”

OSEA is approved as intervenor as it relates to one area of interest put forward by OSEA, that being to “support energy efficiency and other Conservation Demand Management (CDM) initiatives”. This area of interest is relevant only in the context of exploring issues related to Hydro One’s consideration of non-wires alternatives for capital projects. OSEA is eligible to apply for an award of costs under the OEB’s Practice Direction on Cost Awards and only in relation to the issue for which it has been granted intervenor status. OSEA shall accept the record of the proceeding as it stands to this point.

Yours truly,

*Original Signed By*

Christine E. Long  
Registrar

c: Eryn MacKinnon, Hydro One Networks Inc.  
All parties to EB-2021-0110