

November 24, 2021

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

Dear Ms Long:

Re: EB-2021-0292 – Smart Metering Entity – Third Party Access to De-Identified Consumption Data

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy Board (“OEB”) by the Independent Electricity System Operator, in its capacity as the Smart Metering Entity (“SME”) for approval to provide access to de-identified electricity consumption data to third parties that are Canadian Government Entities. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The OEB’s Decision in this proceeding will impact the ability of the SME to use residential electricity consumption data.

On March 15, 2020, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in OEB proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To assess the SME’s proposals and their potential impact on customers. Specifically, the Council wants to ensure the interests of utility customers and their personal data are sufficiently protected; and
2. To participate in the various aspects of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many electricity proceedings over a long period of time and specifically, the Council participated in the SME’s previous application dealing with third party access to data. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all correspondence related to this proceeding be sent to the following consultant:

Julie Girvan
62 Hillside Avenue East
Toronto, ON
M4S 1T5

jgirvan@uniserve.com

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: Adrian Pye, IESO
Miriam Heinz, IESO
Ken Whitehurst, Consumers Council of Canada