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December 2, 2021

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

Dear Ms. Long

**RE: EB-2021-0292 SME Application to expand Third Party Access  
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2021-0292 proceeding, the application by the IESO in its capacity as the Smart Metering Entity (SME) to expand third party access beyond the IESO and Ontario Energy Board to Canadian Governmental Entities.

### 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 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's interest in this proceeding is the impact of the application on customers, including its supporters. Specific areas of concern to Energy Probe are:

- (i) the adequacy of the process for obtaining consent from consumers,
- (ii) the potential for misuse of consumer metering data by third parties,
- (iii) the potential for loss of consumer privacy, and
- (iv) the potential for under-recovery of costs from third parties.

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## **Hearing**

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe believes that a written hearing would be appropriate.

## **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.

## **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 consultant:

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
41 Divadale Drive  
Toronto ON  
M4G 2N7  
Tel: 416 423-3685  
[tom.ladanyi@rogers.com](mailto:tom.ladanyi@rogers.com)

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)  
Michael Bell (OEB Staff)  
Miriam Heinz (IESO)  
Adrian Pye (IESO)

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