

December 3, 2021

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

Attn: Ms. C. Long
Registrar

Via the Ontario Energy Board Web portal

Dear Ms. Long

Re: **EB-2021-0292**

The Electricity Distributors Association (EDA) is writing to seek intervenor status in the above-named proceeding and to comment on the Smart Metering Entity's (SME) proposal that any Settlement Conference the Ontario Energy Board (OEB) may provide precede the discovery phase of this application's processing.

Request for Intervenor Status

The EDA is the voice of Ontario's local distribution companies (LDCs) and represents the interests of over 50 publicly and privately owned local distribution companies (LDCs) in Ontario. The distribution sector delivers electricity to 5 million residential, commercial, industrial and institutional customers throughout the province.

Ontario's LDCs have a significant interest in the above-named proceeding. They are solely responsible for the ownership and operation of the smart meters deployed throughout Ontario that record and gather the electricity consumption data of Ontario's small volume consumers: the residential and small general service <50kW customers. These customers look to their LDC for answers to questions whether about who uses their data and for what purposes or if a party may profit from having access to their data. LDCs are responsible for securing and protecting their customers' data from inappropriate access and from access by unauthorized parties. These customers and their data are at the heart of the Application.

The EDA intends to actively and responsibly participate in all aspects of this proceeding (e.g., testing the SME's written pre-filed evidence, attending technical conferences, filing submissions). The EDA's focus will be informed by the issues that small volume consumers raise with our members (e.g., testing that information and information sharing is appropriately secure, testing whether the SME's data sharing infrastructure duplicates other data sharing services) and our members concerns for the cost effective and efficient provision of service.

The EDA will not seek an award for costs, per the Board's Cost Award Guidelines, and will not use the French language.

Please direct all correspondence to the individuals named below:

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Comments on the SME's Proposed Processing

The EDA is not opposed to the unusual processing step proposed by the SME, specifically that settlement precede discovery. We recognize that there is an established pattern of Settlement Conferences commencing with discovery in the form of an untranscribed and informal Technical Conference. Should the OEB authorize the SME's approach we seek the ability to revisit this position for whether the record of this proceeding is appropriately complete and for whether the approach has introduced risks to intervenors and interested parties.

Sincerely,



Ted Wigdor
Vice President, Policy, Government and Corporate Affairs