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December 6, 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-2021-0280 Brantford Power Inc. and Energy+ Inc. MAADs Application  
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-2021-0280 proceeding, the MAADs Application and related Relief under Section 86 of the Ontario Energy Board Act by Brantford Power Inc. and Energy+ Inc.

**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 was an intervenor in the EB-2021-0009 Brantford Power Inc. 2022 COS rebasing proceeding. Energy Probe's interest in this proceeding is the impact on customers, including Energy Probe supporters, resulting from:

- (i) the transactions leading up to the formation of LDC Amalco,
- (ii) the continuation of the existing deferral and variance accounts of Brantford Power Inc. and Energy + Inc.,

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- (iii) the proposed treatment by LDC Amalco of the PILS impact of CCA smoothing by Brantford Power Inc., and
- (iv) the setting of rates during the proposed 10-year rebasing period.

### 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 consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 <a href="mailto:tom.ladanyi@rogers.com">tom.ladanyi@rogers.com</a>	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 <a href="mailto:spainc@rogers.com">spainc@rogers.com</a>
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Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)  
Roger Higgin (Sustainable Planning Associates Inc.)  
Paul Kwasnik (Brantford Power Inc.)  
Ian Miles (Energy+ Inc)

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