



**Savoie
Laporte**

Savoie Laporte LLP
Bay Adelaide Centre West
333 Bay Street, suite 900
Toronto, ON M5H 2R2
Canada

Myriam Seers
myriam.seers@savoielaporte.com
+1 416 886 7154
Sebastian Melo
sebastian.melo@savoielaporte.com

Sent by Email

June 20, 2022

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi,

**Re: EB-2022-0013 Application for Incremental Capital Funding by Alectra
Utilities – SBUA Notice of Intervention**

We are counsel to the Small Business Utility Alliance (SBUA). Please find enclosed SBUA's Notice of Intervention requesting intervenor status and cost eligibility in the above-noted proceeding.

Yours very truly,

Myriam Seers
Savoie Laporte
Counsel for the Small Business Utility Alliance (SBUA)

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended;

AND IN THE MATTER OF an application by Alectra Utilities for an Order or Orders approving Incremental Capital Module funding to undertake urgent underground cable renewal projects in the PowerStream Rate Zone and the Enersource Rate Zone for 2023 and 2024.

EB-2022-0013

NOTICE OF INTERVENTION OF THE SMALL BUSINESS UTILITY ALLIANCE

A. APPLICATION FOR INTERVENOR STATUS

1. Small Business Utility Alliance (“SBUA”) applies for intervenor status in this proceeding pursuant to Rule 22 of the Board’s Rules of Practice and Procedure.

B. SBUA

2. SBUA is a group of small business ratepayers in Ontario with its members located, for example, in the Cities of Toronto and Ottawa, the Counties of Chatham-Kent, Wellington, Muskoka, Brant, Suffolk, and Norfolk, and the Niagara Falls area.

C. NATURE AND SCOPE OF SBUA’S INTERVENTION

3. SBUA intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. Also, SBUA intends to participate in any oral or written hearings, oral or written submissions, as well as any other parts of the process.
4. SBUA intends to be an active participant in this proceeding and will act responsibly in the proceeding by submitting evidence, argument or

interrogatories, or by cross-examining a witness. The participation will include but not limited to the following:

- a. The appropriateness and reasonableness of the amounts claimed by Alectra Utilities in the Incremental Capital Module;
 - b. The details of the proposed allocation of those amounts for Cable Injection and Cable Replacement.
 - c. The cost-effectiveness of the allocations proposed by Alectra Utilities.
 - d. The role of the Small Businesses in the survey carried out by Alectra Utilities, and
 - e. The normal level of capital expenditures by Alectra Utilities.
5. Furthermore, SBUA will act responsibly to coordinate its participation with other parties to the extent they seek similar objectives.

D. COSTS

6. SBUA intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this proceeding.

E. NATURE OF HEARING REQUESTED

7. Until interrogatories have been answered, it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

F. SBUA'S REPRESENTATIVES

8. SBUA requests that further communications with respect to this proceeding be sent to the following:

Savoie Laporte LLP
Bay Adelaide Centre West
333 Bay Street, Suite 900
Toronto ON M5H 2R2

Attention: Myriam Seers, Sebastian Melo and Ryan Pistorius
Telephone: +1 416 886 7154
Email: myriam.seers@savoielaporte.com
sebastian.melo@savoielaporte.com
ryan.pistorius@savoielaporte.com

As well as service (for electronic communications only) on:
James M. Birkelund, Counsel
Energy and Environmental Law Group
james@birkelundlaw.com

SBUA respectfully requests your acceptance of this intervention and confirmation that it will be eligible for costs.

Submitted on behalf of the Small Business Utility Alliance this June 20, 2022.



Myriam Seers
Sebastian Melo
Ryan Pistorius
Counsel for the SBUA