



**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

July 4, 2022

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

Dear Ms. Marconi,

Re: EB-2022-0028 Application for approving a raise in the electricity distribution rates by EPCOR Electricity Distribution Ontario Inc. – 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 EPCOR Electricity Distribution Ontario Inc. for an Order or Orders approving raising its electricity distribution rates effective January 1, 2023, as well as an Order or Orders approving new deferral and variance accounts.

EB-2022-0028

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. Pursuant to SBUA’s constitution, its specific purpose is to “*represent, protect and promote the interests of small businesses as utility customers of electric, natural gas, water and communications services before administrative and regulatory bodies on utility and energy matters.*” Its object is to “*advocate for the broader interests of the small business community as a whole and not the specific or direct financial interests of individual small businesses or the members of [its] alliance.*”
3. SBUA’s 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. In anticipation of its potential intervention in this case, SBUA has begun engagement efforts vis-à-vis small businesses in the Collingwood, Stayner, Creemore and Thornbury. However, regardless of the location of its member base, SBUA is committed to advocating for the interests of

small business ratepayers in the Province of Ontario generally, as set out in its Constitution.

C. NATURE AND SCOPE OF SBUA'S INTERVENTION

4. 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.
5. 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 proposed by EPCOR Electricity Distribution Ontario Inc. as new electricity distribution rates effective January 1, 2023.
 - b. The appropriateness and reasonableness of the Distribution System Plan proposed by EPCOR Electricity Distribution Ontario Inc.
 - c. The role of the Small Businesses in the Distribution System Plan proposed by EPCOR Electricity Distribution Ontario Inc.
 - d. The requests made by EPCOR Electricity Distribution Ontario Inc. regarding the creation or clearance of deferral accounts, and
 - e. Generally, to represent the interests of SBUA in this process.
6. Furthermore, SBUA will act responsibly to coordinate its participation with other parties to the extent they seek similar objectives.

D. COSTS

7. 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

8. 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

9. 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 July 4, 2022.



Myriam Seers
Sebastian Melo
Counsel for the SBUA