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October 27, 2023

**Via Email**

Ms. Nancy Marconi  
Registrar  
**Ontario Energy Board**  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**RE: Consultation on Policy for Standby Rates  
Ontario Energy Board File No. EB-2023-0278  
Stakeholder [and Late Intervention] Request - Ontario Association of Physical Plant  
Administrators**

Dear Ms. Marconi:

Jupiter Energy Advisors Inc. (Jupiter) has been retained by the Ontario Association of Physical Plant Administrators (OAPPA) to assist the association on matters related to the above-noted Policy. Jupiter is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as a stakeholder and potentially as an intervenor, if necessary, in the EB-2023-0278 proceeding and provides the following information:

1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario. OAPPA uses an estimated 1.1 TWh of electricity annually, as received through a variety of distributors and via the Independent Electricity System Operator. Numerous Ontario universities are currently subject to disparate Standby Rate applications and almost all universities will be impacted once a threshold standard of > 10kW applies; as a result, OAPPA member universities have a direct interest in this consultation and potential proceeding. At this time, OAPPA anticipates being active in the Stakeholder process and potential proceeding, as necessary, to ensure that the resulting standby rate levels, structures, and terms and the conditions of service, are fair and reasonable.
2. OAPPA also seeks a determination that it is eligible for an award of costs. OAPPA concedes that it is filing Late but advises that it was neither an Intervenor nor a party to any of the COS rate cases identified by the Board in its September 28, 2023 notification and only recently became aware of the connection to EB-2023-0278. With respect to the

cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.

3. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards is provided in the attachment to this letter.
4. OAPPA requests that all correspondence and documents be provided directly to Jupiter's representative for this proceeding:

John Voss, P.Eng., MBA  
Principal  
c/o Jupiter Energy Advisors Inc.  
21 Four Seasons Place, Suite 101  
Toronto, Ontario  
M9B 6J8  
Telephone: 416-622-9449 x 102  
E-mail: john.voss@askjupiter.ca

OAPPA further requests that all correspondence and documents be directed to:

Scott Walker, MBA, P.Eng.  
Principal, President and CEO  
Jupiter Energy Advisors Inc.  
21 Four Seasons Place, Suite 101  
Toronto, Ontario  
M9B 6J8  
Telephone: 416.622.9449, ext. 222  
Fax: 416.622.9797  
E-mail: scott.walker@askJupiter.ca

Should you have questions or require further information, please contact me at the above e-mail address or telephone number.

Yours truly,

  
Scott Walker

cc. Andrew Frank, OEB, (e-mail)  
N. Splinter, OAPPA / Queen's University (e-mail)

**ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS**  
**Information Required by Section 3.03.1 of the Practice Direction on Cost Awards**

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College	Trent University
Brock University	Toronto Metropolitan University
Carleton University	University of Toronto
University of Guelph	University of Toronto – Mississauga
Lakehead University	University of Toronto – Scarborough
Laurentian University	University of Ontario Institute of Technology
McMaster University	University of Waterloo
Nipissing University	University of Windsor
Ontario College of Art and Design University	Wilfred Laurier University
University of Ottawa	Western University
Queen’s University	York University

OAPPA’s Mission Statement: To assist higher education facilities, officers and staff develop, maintain, and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation in natural gas related proceedings has focused primarily on the rate proceedings of Enbridge Gas Inc. The majority of OAPPA members are customers of Enbridge Gas with some members in the current EGD zone and others in the current Union zones. From an operating perspective, the rate structures, rate levels, and terms and conditions of service are of direct and significant importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions at the Ontario Energy Board by its external advisor, Jupiter Energy Advisors Inc. Jupiter performs several functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the OEB. The Chair of the OAPPA Energy Committee is Jupiter’s primary contact, and the current Chair of this Committee is Mr. Nathan Splinter, Manager – Energy, Sustainability, CHP, Refrigeration at Queen’s University. The individuals who are Jupiter’s representatives for a given OAPPA intervention are provided in OAPPA’s letter of intervention.