

**From:** Ontario Energy Board <webmaster@oeb.ca>  
**Sent:** November 20, 2024 4:32 PM  
**To:** registrar@oeb.ca  
**Cc:** mark@shepherdrubenstein.com  
**Subject:** Intervention Form: EB-2024-0331 - School Energy Coalition (SEC)

## Intervention Form

### Case Number:

EB-2024-0331

### Intervenor Name:

School Energy Coalition (SEC)

### Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

### Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

### Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

### Governance Structure:

Refer to the Frequent Intervenor Form below.

### Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.  
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## Other Contacts:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.  
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## Frequent Intervenor Form:

<https://www.rds.oeb.ca/CMWebDrawer/Record/871744/File/document>

## OEB Proceedings:

EB-2024-0046, EB-2024-0058, EB-2024-0193, EB-2024-0006, EB-2024-0216, EB-2024-0200, EB-2024-0117, EB-2024-0116, EB-2024-0125, EB-2024-0199, EB-2024-0023, EB-2024-0022, EB-2024-0067 (all approved intervenor status).

## Issues:

SEC has a substantial interest in this application as its members pay electricity commodity rates that recover costs, which are, in part, determined by the operation of the IESO-Administered Market (“IAM”) pursuant to the Market Rules. The amendments to the Market Rules at issue, intended to operationalize the IESO’s Market Renewal Program (“MRP Market Rules Amendments”), are designed to provide benefits to electricity consumers by reducing system costs (see Reasons of the IESO Board in respect of amendments to Market Rules, MR-00481-R00-R13; IESO MRP Business Case Validation Memo, September 22, 2022).

If the Applicants succeed in their challenge to the MRP Market Rules, it could materially impact the costs that electricity consumers will have to pay in the future and, at the very least, increase costs due to the delayed implementation of the MRP. The Applicants’ overarching complaint is that they will be paid less by the IESO under the MRP Market Rules Amendments than under the current Market Rules. Amounts that will ultimately be recovered from electricity consumers.

## Policy Interests:

N/A

## **Hearings:**

SEC believes it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

## **Evidence:**

SEC does not intend to file any evidence.

## **Coordination with Other Intervenorors:**

SEC will coordinate with other intervenors with similar interests, where appropriate, to promote responsible participation in the proceeding.

## **Cost Awards:**

SEC applies for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC's members pay electricity rates that are determined, in part, by the operation of the IAM, and is eligible for an award of costs pursuant to section 3.03(a) of the Practice Direction. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings. This includes the most recent proceeding to review a Market Rule amendment (EB-2019-0242).

## **Language Preference:**

SEC intends to participate in English.