



**Pollution
Probe**

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Ms. Nancy Marconi
Registrar
Ontario Energy Board
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Toronto, ON M4P 1E4

April 8, 2025

**EB-2025-0102 Total Cost Benchmarking Update
Pollution Probe Cost Eligibility Request**

Dear Ms. Marconi:

Pollution Probe received the notice for the above noted consultation which is in relation to the OEB's review of Total Cost Benchmarking (TCB) in the assessment of overall cost performance of rate regulated electricity distributors. This consultation is aimed at renewing the 2013 benchmarking methodology which is expected to incent distributors towards enhanced productivity. This is a key review with potential future impacts for regulated electricity distributors. Per the OEB notice, Pollution Probe hereby requests that it be eligible for the recovery of reasonably incurred costs for its participation. Pollution Probe represents a direct consumer and policy interest related to the issues outlined in the consultation.

Pollution Probe is a frequent participant in OEB consultations and proceedings and a copy of our current Annual Filing can be found on the Board's website at the following location:

<https://www.rds.oeb.ca/CMWebDrawer/Record/893229/File/document>

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, future of natural gas and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible.

Pollution Probe has been an active and valuable participant in OEB consultations, regulated electricity distributor proceedings and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, municipal and environmental interests in Ontario.

Pollution Probe respectfully requests your acceptance of the request to participate and confirmation that it will be eligible for its costs.

Notice

Pollution Probe requests that further communications with respect to this matter be sent to:

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Respectfully submitted on behalf of Pollution Probe.



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Cc: Richard Carlson, Pollution Probe (via email)