



---

## THE BOARD OF DIRECTORS

PATRICIA ADAMS  
Chair and President  
ANN CAVOUKIAN  
Executive Director, PBDI, Metropolitan University  
GLENN FOX  
Economist, University of Guelph  
GAIL REGAN  
President, Cara Holdings Inc.

MAX ALLEN  
Producer, CBC Radio  
DAVID CAYLEY  
Writer and Broadcaster  
RICHARD C. OWENS  
Lawyer (retired)  
GEORGE TOMKO  
Expert-in-Residence in IPSI, University of Toronto

---

April 14, 2025

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, P.O. Box 2319  
Toronto ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2025-0102 Total Cost Benchmarking Update  
Energy Probe Late Participation and Cost Award Eligibility Request**

Energy Probe Research Foundation (Energy Probe) hereby applies for late participation and cost award eligibility in the EB-2025-1012 Total Cost Benchmarking Update consultation including the Stakeholder Meeting on April 24, 2025.

In its letter of April 1, 2025, the OEB invited interested parties to apply to participate in the Total Cost Benchmarking Update consultation. Because of other commitments Energy Probe inadvertently missed the April 8 deadline for participation requests. Energy Probe apologizes for its late intervention and hopes that the OEB will accept its apology.

.

**Statement of Interest**

Energy Probe is a frequent intervenor in OEB proceedings and a participant in its consultations. Energy Probe was a participant in past OEB consultations that resulted in the development of performance based regulation including total cost benchmarking. Its 2025 annual filing can be found at:

<https://www.rds.oeb.ca/CMWebDrawer/Record/880331/File/document>

Members and supporters of Energy Probe are customers of Ontario electricity distributors and have an interest in the outcome of the Total Cost Benchmarking Update consultation.

---

Energy Probe Research Foundation 417 Bloor Street West, Suite 202, Toronto, Ontario, M5S 1X6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: [EnergyProbe@nextcity.com](mailto:EnergyProbe@nextcity.com) Internet: [www.EnergyProbe.org](http://www.EnergyProbe.org)

### **Cost Award Eligibility**

Energy Probe is a non-profit organization which relies on individual donations to help protect the interest of its members and supporters. Without the prospect of an award of costs, Energy Probe's ability to participate in consultations would be limited. Energy Probe intends to seek a cost award for its participation in this consultation. As an organization representing the direct interests of electricity consumers it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

### **Communications**

Communications relating to this participation and cost award eligibility request letter should be directed to its consultant:

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
41 Divadale Drive  
Toronto ON  
M4G 2N7  
Tel: 416 423-3685  
tom.ladanyi@rogers.com

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe)  
Kai Hao (OEB Staff)