

# Elson Advocacy

July 17, 2025

**BY RESS**

**Ritchie Murray**  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

Dear Mr. Murray:

**Re: EB-2025-0204 – Distribution Customer Connections Review  
Invitation to Participate in Working Group**

We are writing on behalf of Environmental Defence to request that Kent Elson be selected to join the Distribution Customer Connections Working Group as a representative of Environmental Defence. We also request that Environmental Defence be granted costs eligibility in this matter.

## **Nature of Interest in the Review**

Environmental Defence seeks participant status and costs eligibility as a leading environmental organization that represents the public interest in environmental protection and the interests of ratepayers who want both clean and affordable energy.

Environmental Defence is well-placed to positively contribute to the customer connections review working group. For example, Environmental Defence provides an important perspective and relevant expertise in relation to all-electric developments, and the importance of keeping connection costs down in all-electric developments. This is an area where cost reductions are achievable through economies of scale and improved design standards, as noted in a recent report to the OEB.<sup>1</sup> It is also an area of increasing importance in light of the energy transition. Environmental Defence has noted some specific proposals to further reduce the costs of these connections in its comments on recent connections-related amendments to the Distribution System Code.<sup>2</sup>

Environmental Defence has been granted intervenor status, participant status, and costs eligibility in over 60 proceedings before the Ontario Energy Board over the past decade. Environmental Defence's energy counsel, Kent Elson, has over 15 years of experience with Ontario Energy Board matters.

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<sup>1</sup> PwC, *Ontario Energy Board: Unit Cost Benchmarking – Communities, Subdivisions and Electrification*, June 13, 2024, p. 15.

<sup>2</sup> EB-2024-0092, Environmental Defence Comments, December 10, 2024 ([link](#)).

Environmental Defence and its counsel, Kent Elson, have been actively engaged in a number of OEB processes relating to customer connections, including the DER connections review, the portions of Enbridge Gas's rebasing case relating to gas connections policy, the electric vehicle connections review, and the Distribution System Code amendments relating to housing developments. Environmental Defence has also raised a number of connection costs issues in electricity distributor rates cases. Environmental Defence's contribution to the working group would include its unique perspective, its expertise relating to impacts of the energy transition, an interest in ensuring that connection assets are appropriately sized to avoid the need for premature replacement due to increasing demand from electrification, and its counsel's qualifications, including his degrees in law and economics, and his extensive experience in OEB proceedings on connections topics.

### **Grounds for Eligibility and Need for Funding**

Environmental Defence is eligible for an award of costs under section 3.03(a) and (b) of the Practice Direction on Costs Awards as it represents "an interest or policy perspective relevant to the Board's Mandate," including environmental protection, and the "direct interest of consumers" whose energy bills can be reduced through measures such as appropriate rate design, integrated resource planning, and reduced transmission losses.

Environmental Defence has no funding to participate in this process without an award of costs eligibility.

### **Further Details Regarding Environmental Defence**

Environmental Defence is a frequent intervener. Its frequent intervener form may be found at the following link: <https://www.rds.oeb.ca/CMWebDrawer/Record/804452/File/document>.

### **Requests for Evidence and Addresses of Representatives**

Environmental Defence requests that electronic copies of the pre-filed materials and all other documents in the proceeding be delivered to the following consultant and counsel:

Electronic copies to:

**Jack Gibbons**  
 Ontario Clean Air Alliance  
 160 John Street, Suite 300  
 Toronto, Ontario M5V 2E5  
 Tel: (416) 260-2080 ext. 2  
 E-mail: [jack@cleanairalliance.org](mailto:jack@cleanairalliance.org)

Electronic copies to:

**Elson Advocacy**

**Kent Elson**

**Amanda Montgomery**

1062 College Street, Lower Suite

Toronto, Ontario M6H 1A9

Tel: (416) 906-7305

Fax: (416) 763-5435

E-mail: kent@elsonadvocacy.ca | amanda@elsonadvocacy.ca

We also request that the above individuals be listed on the participants' list under Environmental Defence.

**Address of Environmental Defence**

Environmental Defence's full name and address is:

**Environmental Defence Canada Inc.**

33 Cecil Street, 1<sup>st</sup> Floor

Toronto, Ontario M5T 1N1

Tel: (416) 323-9521

Fax: (416) 323-9301

However, please send correspondence and any other materials to both Jack Gibbons and to counsel as the authorized representatives.

**Service on other Parties**

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,



Kent Elson