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Hydro Ottawa Limited
Hydro Ottawa limitée
hydroottawa.com

Via RESS

October 14, 2026

Mr. Ritchie Murray, Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON, M4P 1E4

Dear Mr. Murray:

Subject: **Hydro Ottawa Limited (Hydro Ottawa)**
2027 Electricity Distribution Rate Application (EB-2026-0051)
Intervention Request of Pollution Probe and Building Owners and Managers Association Ottawa

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Hydro Ottawa is in receipt of the intervention requests submitted by Pollution Probe and Building Owners and Managers Association Ottawa (BOMA Ottawa) regarding the above-noted proceeding. While Hydro Ottawa is not formally objecting to these requests for intervenor status or cost award eligibility, the utility respectfully submits the following observations regarding the narrow scope of this proceeding relative to the issues raised by the proposed intervenors. Ultimately, Hydro Ottawa relies on the Ontario Energy Board (OEB) to determine whether these Parties[1] have sufficiently demonstrated the required substantial interest in this specific proceeding.[2]

In its *Intervention Process - Guidance Document*,[3] the OEB defines a substantial interest as having a material interest that is within the scope of the proceeding, such as representing the direct interests of consumers, representing a policy perspective relevant to the OEB's mandate and the proceeding, or having an interest in land affected by the proceeding.

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[1] Hydro Ottawa and the following intervenor groups: Building Owners and Managers Association Ottawa, Coalition of Concerned Manufacturers and Businesses of Canada, Community Action for Environmental Sustainability, Consumers Council of Canada, Distributed Resource Coalition, Environmental Defence, Energy Probe Research Foundation, Pollution Probe, School Energy Coalition, Vulnerable Energy Consumers Coalition.
[2] Ontario Energy Board, *Intervention Process - Guidance Document*, (March 2023), page 1.
[3] Ibid, page 12.

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Pollution Probe's intervention form notes they have a consumer and policy related interest and does not indicate a specific issue related to the 2027 Application, but rather notes that they were a party to Hydro Ottawa's 2026 Application. While Pollution Probe notes a policy interest, Hydro Ottawa would suggest it is not an element of the 2027 Application. This application represents Hydro Ottawa's Year 2 rate update under its approved five-year Custom Incentive Rate-setting (Custom IR) plan, which as per the Approved Settlement Agreement,[4] is limited to updating the rate design that was agreed to as part of that proceeding and OEB published inflation. While Hydro Ottawa has no issue with any of the Parties ensuring adherence to the agreed-upon rate design update, Hydro Ottawa notes that during its 2026 Custom IR rebasing proceeding, Pollution Probe's areas of focus did not appear to include rate design, and it is not noted as part of its intervention form for this application. Therefore, it is unclear how Pollution Probe's stated interests relate to this specific update.

BOMA Ottawa describes its mandate and objectives within the intervention form as generally policy-related and provides examples such as energy transition, conservation, energy pricing and supply, advanced metering infrastructure, property taxes, labour requirements, building materials and equipment regulations, which are not being tested as part of this application. Under the policy section BOMA Ottawa entered "N/A". Hydro Ottawa notes that this 2027 application is a mechanistic update that was agreed-upon as part of its Approved Settlement Agreement, which BOMA was a party to. Unlike the intervention of Hydro Ottawa's 2026-2030 Custom IR Application, BOMA Ottawa provides no specific details within the issues section. Based on the intervention form, the rationale for BOMA Ottawa's intervention in this particular application is unclear.

Hydro Ottawa respectfully submits these observations to support the regulatory efficiencies intended in its original Custom IR Application and maintained and enhanced by the Approved Settlement Agreement, including through narrowly scoped adjustments. As noted above, Hydro Ottawa has no issue with any of the Parties ensuring adherence to the agreed-upon rate design update; however neither intervention request has identified this as the basis for intervention, nor clearly stated their specific issues relative to this application.

[4] Hydro Ottawa Limited, *2026-2030 Custom Incentive Rate-Setting Approved Settlement Agreement*, EB-2024-0115 (January 16, 2026).

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Additionally, Hydro Ottawa is seeking procedural clarification regarding Pollution Probe's intervention request. In its filing, Pollution Probe stated its intent to coordinate input from Community Action for Environmental Sustainability Ottawa (CAFES Ottawa) during this proceeding. CAFES Ottawa was a separate intervenor as part of Hydro Ottawa's 2026-2030 Custom IR Application. To date, Hydro Ottawa has not received an independent intervention request from CAFES Ottawa. To ensure clarity regarding the respective roles of the Parties, and to provide transparency regarding intervention, representation and cost award eligibility, Hydro Ottawa suggests that if CAFES Ottawa intends to actively participate in this proceeding through Pollution Probe, it would be procedurally appropriate for CAFES Ottawa to apply for intervention status separately. Alternatively, Hydro Ottawa suggests that Pollution Probe and CAFES Ottawa submit a joint intervention request so that their respective roles, intervention and coordination in the proceeding are clear and on the record.

Respectfully,



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