

EB-2007-0630

Ontario Energy Board

Distributed Generation: Rates and Connection

Energy Probe Research Foundation

◆Request for Funding◆

Submitted July 19, 2007

Board's Proposed Consultation Process – Request for Funding

i) Statement of Interest

Energy Probe Research Foundation (Energy Probe) is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its residential customer supporters in Ontario, which we have some number of thousands, and also representing a broader public interest concern with respect to the overall financial health and operational integrity of our utilities.

The Foundation, one of Canada's largest environmental policy organizations and Canada's largest energy policy organization, has over 30,000 supporters, half of them in Ontario, of which most have tangibly expressed interest in energy issues. Energy Probe also has a strong consumer focus and is frequently acknowledged in the media as a consumer watchdog. Energy Probe participates in national and provincial conferences and regulatory forums on energy issues which it believes to be in the public interest. In this instance, Energy Probe submits that it has met the Board's cost eligibility criteria under section 3.03 (a) of the *Practice Direction on Cost Awards*.

Many Energy Probe supporters receive information updates, often several times a week. Energy Probe frequently has direct communication with the public through interviews with the media, communications on the Internet, public speaking, and direct mail communication with its supporters.

Energy Probe has a history of representing the interests of many Ontarians who are not financial supporters, and receives active feedback on its initiatives through public and media interaction.

Energy Probe has appeared before the Board for over 30 years, during which time it has been noted for its cooperative spirit, its often-unique perspective, and its contribution to the development of fair and reasonable rates for both individual consumers and commercial/industrial purchasers of natural gas and electricity. Its approach has been to look beyond annual cost minimization to consider what would be best for the marketplace in the long term.

Energy Probe then, is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of funding assistance, its participation in the consultation initiatives of the Ontario Energy Board, and its ability to produce policy position papers, would be quite limited as well.

Members of Energy Probe's team regularly attend meetings of its Board of Directors, making presentations, providing written summaries of activities, answering the questions of Board Members, and receiving their input.

In addition, Energy Probe reports its regulatory priorities to supporters by direct mail and receives both financial support and comments in response from those supporters.

Energy Probe has been actively involved in the Board's regulation of electricity distribution utilities since the passage of the amended OEB Act in 1998. This involvement has extended to the development and amendment of the Distribution System Code, recovery of regulatory assets, C&DM initiatives, smart meter initiatives and electricity distributor rates.

Energy Probe has a long and unique record of advocating measures designed optimize the power generation system in Ontario. Energy Probe is interested in examining the barriers to distributed generation within Ontario as learning is provided by the examination of other jurisdictions.

ii) Energy Probe's Participation

Energy Probe intends to fully participate in submitting written comments on the report prepared by EES Consulting Inc. and the Staff Discussion Paper by August 24, 2007 and in such consultations as requested by Board staff.

Energy Probe would like to remind the Board that in prior Board processes in which it has expressed its interest, it has participated well beyond minimum requirements.

Recently, Energy Probe was an active participant in EB-2006-0207, the process for establishing Guidelines to review the Integrated Power System Plan; in EB-2006-0064, the process to establish a methodology for setting Payment Amounts for Ontario Power Generation Prescribed Generation Assets; and, in EB-2006-0088/89, the consultation process to assist the Board in establishing a Multi-Year Electricity Distribution Rate Setting Plan

iii) Other Sources of Funding

Energy Probe will access funding from general donations from its supporters to make up any shortfall should it exceed the cost allowances of the Board. Energy Probe relies on volunteers to be able to support its regulatory and other work, including a volunteer Board of Directors.

iv) Energy Probe's Advisory Team

Energy Probe will be assisted by the following consultants, to whom communications concerning this process should be directed:

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Respectfully submitted at Toronto, Ontario this 19th day of July, 2007.

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Case Manager