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May 21, 2020

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Toronto ON  
M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0133 Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency  
Energy Probe Participation and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) applies to participate in the EB-2020-0133 Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency and requests that it be eligible for the recovery of the costs for its participation.

**Statement of Interest**

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It has been a responsible participant in OEB proceedings for over thirty years. Energy Probe will be representing its many individual residential customer supporters who have broad concerns with respect to the overall financial health and operational integrity of Ontario utilities. It argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. Energy Probe promotes sustainable resource use through individual responsibility and accountability.

The proposed deferral account and sub-accounts and future recovery of accumulated balances from ratepayers could have a significant impact on electricity and gas bills of residential customers. The purpose of the account and the subaccounts is to record incremental costs arising from the COVID-19 emergency. Based on Energy Probe's experience in recent proceedings, there is no clear and consistent definition of incremental utility costs, and there are large

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**Energy Probe Research Foundation** 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

differences between electricity and gas distributors regarding which costs are deemed incremental. Energy Probe expects to focus on the establishment of consistent definitions of incremental costs to be recorded in the deferral account and sub-accounts. Energy Probe will also focus on several other issues to be addressed in the consultation including load loss, materiality, prudence, recovery from ratepayers, and cross-subsidies between rate classes.

### Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in the consultation process would be very limited. Energy Probe intends to seek a cost award in this consultation process, and expects to participate responsibly, cognizant of the Board's guidelines regarding cost awards.

### Consultants

Energy Probe will be represented by its consultants, Tom Ladanyi and Roger Higgin. Their CVs are on file with the OEB and their contact information is provided below.

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 <a href="mailto:tom.ladanyi@rogers.com">tom.ladanyi@rogers.com</a>	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 <a href="mailto:spainc@rogers.com">spainc@rogers.com</a>
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Energy Probe expects that its participation will consist of meeting attendance and submission of written comments.

Respectfully submitted on behalf of Energy Probe.

*Original signed by*

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Tom Ladanyi  
Consultant representing Energy Probe

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