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September 7, 2021

Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: APPrO Intervention Request: EB-2021-0136: Hydro One Networks Inc. – Richview to Trafalgar section 92 leave to reconductor application

We are counsel to the Association of Power Producers of Ontario (“**APPrO**”). Hydro One Networks Inc. (“**HONI**”) has filed an application for an order(s) granting leave to reconductor existing transmission line circuits along the route between Richview Transformer Station and Trafalgar Transformer Station (“**RTR Project**”) with the Ontario Energy Board (the “**OEB**”). APPrO hereby requests intervenor status in this proceeding.

A. APPrO and Its Interest in the Proceeding

APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO’s members produce electricity from natural gas, hydro, nuclear, wind, biogas and other sources. A description of APPrO, its mandate and objectives, membership and representative constituency, and programs and activities are summarized in Attachment 1.

B. APPrO’s Experience as a Frequent Intervenor

APPrO has a record of frequent participation in OEB proceedings as an intervenor. In addition to previous OEB proceedings including HONI’s application for approval of its 2020-2022 transmission rates (EB-2019-0082), HONI’s application for approval of its 2015/2016 distribution rates (EB-2014-0140), HONI’s application for approval of its 2013/2014 transmission rates (EB-2012-0031), and HONI’s application for its 2011/12 transmission rates (EB-2010-0002), APPrO has participated in proceedings involving Union Gas, Enbridge, Hydro One, the IESO and the former Ontario Power Authority, as well as OEB-sponsored consultations.

C. Nature and Scope of APPrO’s Intended Participation

APPrO intends to be an active participant in this proceeding for the limited scope of requesting information, participating in any requisite motions, testing evidence through the stipulated processes, submitting written interrogatories and providing argument in accordance with the OEB’s procedures stipulated for this proceeding, all and only with respect to the IESO’s Need

Report entitled *Trafalgar TS X Richview TS 230 kV Line Upgrade: Need and Selection of the Preferred Plan* (filed as Exhibit B-3-1, Attachment 3) and related IESO letter dated December 10, 2020 (filed as Exhibit B-3-1, Attachment 1). Subject to the development of the record in this matter, APPrO may also submit evidence.

Testing the evidence and assumptions made as part of the IESO's decision-making process with respect to evaluating alternative options and making its final recommendation in support of the RTR Project is critical to fostering transparency among industry stakeholders and ensuring that fair and efficient competition is maintained among supply-side resources. A consistent purposeful, transparent and long-term approach to planning that leads to competitive procurement of necessary facilities, where feasible, will instill confidence in consumers and market participants. Confidence is necessary to attract investment in the electric system components identified in the planning process.

APPrO also believes it is in the public's interest to facilitate generator participation. In addition to the great majority of APPrO members being customers of HONI, APPrO members build generation projects in close consultation with HONI. Accordingly, the OEB should facilitate the participation of generators in order to provide the best evidentiary basis for its determination.

In addition, many of APPrO's members are too small to participate individually in a meaningful way in this proceeding. APPrO therefore brings the perspectives of these stakeholders to this proceeding, and has a direct interest in the promotion of economic efficiency and cost-effectiveness of the electricity infrastructure of Ontario.

APPrO does not take a position with respect to whether a written or oral hearing is appropriate, and will follow the OEB's direction in this regard.

D. Costs

In accordance with the OEB's Practice Direction on Cost Awards (the "**Cost Awards Direction**"), and although subsection 3.05(b) of the Cost Award Direction stipulates that despite section 3.03 generators are not eligible for a cost award, section 3.06 states that notwithstanding section 3.05 a party which falls into one of the categories listed in section 3.05 may be eligible for a cost award if it is a customer of the applicant.

APPrO submits that it should be eligible for its reasonably incurred costs on the grounds that it represents a class of HONI customers in this proceeding. APPrO has been awarded costs by the OEB in previous proceedings including HONI's application for approval of its 2020-2022 transmission rates (EB-2019-0082), HONI's application for approval of its 2015/2016 distribution rates application (EB-2014-0140), HONI's application for approval of its 2013/2014 transmission rates (EB-2012-0031), and HONI's application for its 2011/12 transmission rates (EB-2010-0002). APPrO submits that it should once again be found eligible for its reasonably incurred costs in this proceeding.

E. APPrO's Representatives

APPrO requests that the OEB, the Applicant and all intervenors provide its below listed representatives with copies of all written evidence and correspondence related to the proceeding, at the contact information below.

APPrO further requests that the below listed individuals be listed in the intervenors' list under APPrO.

Association of Power Producers of Ontario
25 Adelaide St. East
Suite 1602
Toronto, ON M5C 3A1

Attention: David Butters, President
Telephone: 416-322-6549, x231
Facsimile: 416-481-5785
Email: david.butters@appro.org

And to APPrO's counsel:

Reena Goyal
Telephone: (416) 601-4308
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Toronto Dominion Bank Tower
Suite 5300, Box 48
Toronto, ON M5K 1E6

APPrO requests the OEB's direction as to whether this letter should be served on any other parties.

Yours truly,

McCarthy Tétrault LLP

Per:



Reena Goyal
Counsel

RG/jk

cc. Mr. David Butters, President & CEO, APPrO

ATTACHMENT 1

A description of APPrO, its mandate and objectives, membership and representative constituency, and programs and activities

APPrO is a trade association founded in 1986, focusing exclusively on the business issues of power producers in Ontario. Its generator member companies build, own and operate power projects in Ontario, across Canada and elsewhere in the world, and produce more than 90% of Ontario's electricity from clean and renewable resources including hydro-electric, nuclear, natural gas, wind, and solar energy.

APPrO's goal is the achievement of an economically and environmentally sustainable electricity sector in Ontario that supports the business interests of electricity suppliers, ratepayers and the provincial economy. APPrO plays a leadership role in the formation of electricity policy and rules to facilitate investment in sustainable electricity infrastructure and the clear and transparent pricing of electricity in Ontario.

APPrO is primarily active in IESO matters, including market rules and market rule amendments, various stakeholder engagements, resource adequacy and other planning initiatives such as the Annual Planning Outlook as well as resulting procurement processes, the Market Renewal Program (MRP) as a whole; generator contract management issues related to MRP, Ontario Emissions Performance Standards (EPS) and federal Output Based Performance Standards (OBPS) as well as other emissions and climate change mitigation policy matters; and OEB regulatory proceedings which involve identifiable concerns for generators in relation to natural gas rates and services, as well as transmission rates affecting generators who are also exporters.

APPrO produces a well-attended and regarded annual conference (Annual Canadian Power Conference & Networking Event, November 29-30, 2021).

APPrO generator members:

1. Algonquin Power & Utilities Corp.
2. Atura Power
3. Brookfield Renewable
4. Bruce Power
5. Capital Power Corporation
6. Capstone Infrastructure
7. ENGIE Canada Inc.
8. Greenfield Energy Centre
9. GTAA - Greater Toronto Airport Authority
10. H2O Power Holding Limited Partnership
11. Invenergy
12. Markham District Energy Inc.
13. Northland Power
14. Ontario Power Generation
15. Toromont Energy Ltd.
16. TransAlta Corp.