17 July 2007

Ms Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street Toronto, ON, M4P 1E4 By e-mail and mail

Dear Ms Walli:

## Re: EB-2007-0031 Review of Electricity Distribution Rate Design – OSEA late intervention

- 1. The Ontario Sustainable Energy Association (OSEA) hereby requests permission to intervene in this matter as a late intervenor and requests that it be found eligible for costs. OSEA only became aware of this matter as a result of references to it in the Board's recently announced consultative initiative on distributed generation (EB2007-0630 announced on July 13th). Board Staff in its discussion paper therein indicates that determinations from this Distribution Rates proceeding may eventually take precedence over that process. OSEA has retained counsel who already acts for the GEC in this matter. OSEA's position is generally aligned with the GEC's although OSEA expects to have a particular focus on DG issues in this proceeding. Accordingly, OSEA expects that its intervention will only marginally increase counsel and consultant time above that that GEC would allocate to the matter and will only seek costs for resources that are incremental to those for which GEC will be seeking recovery.
- 2. Organizational information: The Ontario Sustainable Energy Association is a public interest group established in May 1999 and is a provincial non-profit association of local organizations developing sustainable energy projects in and for their communities. OSEA aims to initiate, facilitate and support the work of community based sustainable energy organizations across Ontario. By offering introductory and advanced workshops on topics ranging from project start-up to green power technologies, OSEA aims to catalyze the efforts of community organizers. As an umbrella organization, OSEA works to build a network of communities so that groups can pool their efforts. OSEA's mission includes taking a leadership role and being a public voice for community-based sustainable energy initiatives.

OSEA has approximately 30 full and associate members. A full member must be formally incorporated as a non-profit organization or cooperative and, subscribe to the mission of OSEA. The group may be planning or actively pursuing community sustainable energy projects. Only full members may participate in the governance of OSEA. An associate member need not be incorporated but must be a community based organization working on, or planning community sustainable energy projects and that subscribes to the mission statement of OSEA. In addition OSEA has individual and corporate supporting members who are not eligible to participate in the organization's governance. It is believed that only one OSEA member (Windshare) has thus far progressed to the stage of being a licenced generator.

OSEA is described on the Trillium Foundation website as follows: "Ontario Sustainable Energy Association (OSEA) is the force behind the increasing number of Ontarians interested in green power alternatives. OSEA relentlessly works at making community green power initiatives a widely acceptable option for meeting Ontario's energy needs." OSEA has been honoured with the 'Minister's Award' – "for generating the most impact across the province".

- 3. The OSEA's primary interest in these proceedings is in regard to rate structures affecting small scale distributed renewable generation.
- 4. OSEA will be an active participant but, as discussed above, it proposes to share counsel with GEC to minimize any duplication of effort.
- 4. We request that OSEA be placed on the distribution list and documents be sent to:

David Poch, Counsel to the GEC 1649 Old Brooke Road, Maberly, ON, K0H 2B0 Tel. 613-264-0055 Fax 613-264-2878 dpoch@eelaw.ca

And to:

Paul Gipe c/o OSEA 401 Richmond Street West, Suite 401 Toronto, Ontario M5V 3A8 Tel. 416-977-4441 Fax 416-977-2157 pgipe@igc.org

Sincerely,

David Poch