

**IN THE MATTER OF a generic proceeding initiated by
the Ontario Energy Board to address a number of
current and common issues related to demand side
management activities for electric distribution utilities.**

**NOTICE OF INTERVENTION
OF THE
SCHOOL ENERGY COALITION**

1. The School Energy Coalition hereby applies for intervenor status and costs eligibility in this proceeding.

General Interest of the Intervenor

2. The School Energy Coalition is a coalition established in 2003 to represent the interests of all Ontario publicly-funded schools in matters relating to energy regulation, policy, and management. It is made up all seven of the major school-related organizations, representing all of the school boards, and all levels of school management, and through them representing the approximately 5000 schools and about 2 million students in Ontario. The primary goal of these organizations is to promote and enhance public education for the benefit of all students and citizens of Ontario. The School Energy Coalition has been accepted as an intervenor in many past and present OEB proceedings relating to both natural gas and electricity.
3. The intervenor's members have a significant interest in the activities of regulated electric utilities and their affiliates in the province, due to the severe financial implications those activities have on school boards, their students and the people of the province of Ontario. Utility costs are one of the most significant cost pressures facing school boards. The cost of utilities to the intervenor's members, of which electricity and natural gas are the major components, is currently in excess of \$370 million, and has increased rapidly over the last five years. To produce balanced budgets in the face of ever increasing utility costs, school boards have repeatedly been forced to cut essential programs and services to the detriment of the students and the public of the province of Ontario. School boards have also consistently shown themselves to be early and aggressive adopters of conservation technologies.

Issues to be Addressed

4. The School Energy Coalition is intervening:
 - a. to assist the Board in its review of the regulatory treatment of CDM funding and spending by utilities, including planning, screening, time frames, strategic research requirements, funding sources, evaluation and audit, and other related issues;
 - b. to participate in the review of regulatory treatment of funding streams, whether global funding or amounts taken out of distribution rates, including direct and indirect rate impacts of operating and capital spending;
 - c. to provide input into any revenue stabilization or reimbursement mechanisms (LRAM) and/or incentive plans (SSM), including structures, targets, calculation methods, evaluation and audit protocols, and other issues;
 - d. to assist the Board in setting parameters around the setting of annual budgets, including formulaic approaches, variance accounts (CDMVA), reporting requirements, and other issues;
 - e. to participate in any discussion of the role of consultatives and other stakeholder structures in order to maximize the value of those activities;
 - f. generally to represent the interests of the school boards and their students in this proceeding in all major aspects of the application.
5. The foregoing summary is intended to be illustrative but not exhaustive. The School Energy Coalition will review the evidence as the record continues to develop, and will advise parties of any further areas of interest/concern as they arise.

The Intervenor's Intended Participation

6. The School Energy Coalition intends to participate actively in all phases of this proceeding, as determined by the Board's procedural order(s), in respect of the issues of concern to its members, as partially identified above. This will include review of the initial report, any ADR, technical conferences and/or interrogatories, and any oral or written hearing processes. The School Energy Coalition does not yet know whether it will file evidence.
7. The School Energy Coalition believes that it is appropriate for this matter to be considered by the Board through an oral hearing process, with formal evidence and the ability to test that evidence, once the initial review of the Board Staff Report has been concluded.

Counsel/Representative

8. The School Energy Coalition requests that a copy of all documents filed with the Board by each participant in this proceeding be served as follows:

(a) School Energy Coalition:

ONTARIO EDUCATION SERVICES CORPORATION
c/o Ontario Public School Boards' Association
439 University Avenue, 18th Floor
Toronto, ON
M5G 1Y8

Attn: Bob Williams, Co-ordinator
Phone: 416 340-2540
Fax: 416 340-7571
Email: bwilliams@opsba.org

(b) School Energy Coalition's counsel:

SHIBLEY RIGHTON LLP
Barristers and Solicitors
250 University Avenue, Suite 700
Toronto, Ontario, M5H 3E5

Attn: Jay Shepherd
Phone: 416 214-5224
Fax: 416 214-5424
Email: jay.shepherd@shibleyrighton.com

c) School Energy Coalition's consultants

INSTITUTIONAL ENERGY ANALYSIS, INC.
250 University Avenue, Suite 700
Toronto, Ontario, M5H 3E5

Attn: Corinne Bassett, Conservation Consultant
Phone: 416 214-5264
Fax: 416 214-5464
Email: corinne.bassett@ieai.ca

Costs

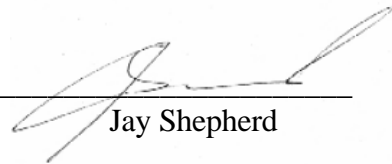
9. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this proceeding. The School Energy Coalition has been held to be eligible for costs in similar proceedings many times in the past, and has never been held to be ineligible for costs at the Ontario Energy Board.

10. The School Energy Coalition intends to retain law firm Shibley Righton LLP, represented by senior counsel Jay Shepherd and intermediate counsel John De Vellis, and energy consulting firm Institutional Energy Analysis Inc., represented by senior conservation consultant Corinne Bassett and intermediate regulatory economics consultant Rachen Chen, to assist in this intervention.

Respectfully submitted on behalf of the School Energy Coalition this 29th day of December, 2006.

SHIBLEY RIGHTON LLP

Per: _____



Jay Shepherd