



Low-Income Energy Network

C/o Advocacy Centre for Tenants Ontario
5th floor, 425 Adelaide St. W, Toronto, Ont. M5C 3C1
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January 10, 2011

Sent by courier and through the Board's web portal

Ms. Kirstin Walli
Board Secretary
P.O. Box 2319
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Re: Renewed regulatory framework for electricity (EB-2010-0377, EB-2010-0378 and EB-2010-0379)

Dear Ms. Walli:

In accordance with the Board's Practice Direction on Cost Awards, the Low-Income Energy Network (LIEN) hereby applies for late intervenor status in the three inter-related initiatives: EB-2010-0377, EB-2010-0378 and EB-2010-0379.

LIEN is an organization that represents more than 80 member groups across Ontario, including energy, public health, legal, tenant/housing, education, social and community organizations. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers. To ensure that all low-income consumers across Ontario have access to energy, these consumers require a comprehensive array of assistance that includes: consumer protection policies and education, bill assistance, aggressive conservation and demand management/demand side management (CDM/DSM) defined as providing deep energy savings per low-income consumer and broad consumer participation across the province, and emergency financial assistance. LIEN is a well-recognized intervenor in other Board proceedings that relate to the impact of electricity initiatives on low-income residential consumers.

Nature and scope of intervention

Together with the interests of its numerous individual members and supporting organizations, LIEN has an interest in all regulatory changes that impact residential rates, thus impacting rates for low-income consumers. LIEN has a substantial interest in ensuring that distributor investment plans are demonstrably economically efficient and cost-effective (EB-2010-0377), in the tools or options to help mitigate the effects of unavoidable and significant rate/bill impacts on low-income ratepayers (EB-2010-0378), and in creating conditions to foster cost-effective and efficient implementation of Board-approved network investment plans by transmitters and distributors (EB-2010-0379). LIEN's interest in this proceeding is to protect the interests of low-income consumers by bringing its knowledge and experience to assist the Board.

Costs

LIEN requests that the Board find it eligible for costs under section 3.03 (a) of the Board's Practice Direction on Cost Awards for all three consultations. LIEN "primarily

represents the direct interests of residential consumers in relation to regulated services.” LIEN has been accepted as a party eligible for an award of costs in other proceedings before the Board.

As a not-for-profit organization, LIEN’s participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other intervenors to avoid duplication where possible. LIEN has retained Judy Simon of IndEco Strategic Consulting (IndEco) to provide consulting advice to LIEN in this proceeding. Ms Simon is an expert in low-income rate matters and has been retained for expert advice in many proceedings by LIEN, and other clients.

LIEN requests that copies of written materials in electronic or other format concerning this proceeding be sent to:

IndEco Strategic Consulting
77 Mowat Avenue, Suite 412
Toronto, ON
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Attention: Judy Simon
Tel.: 416.204.0357
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Sincerely,



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