



ENERGY ADVISORS INC.

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March 22, 2016

Via RESS and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**RE: Ontario Energy Board File Number EB-2015-0363
Consultation to Develop a Regulatory Framework for Natural Gas Distributors' Cap and
Trade Compliance Plans**

**Ontario Association of Physical Plant Administrators (OAPPA) – Request to Participate and
Request for Cost Eligibility**

In response to the Board's March 10, 2016 letter, OAPPA has requested that Aegent Energy Advisors Inc. (Aegent) submit this letter on the association's behalf indicating OAPPA's interest in participating in the above-noted consultation. Specifically, OAPPA would like to have the opportunity to provide comments on the draft regulatory framework. OAPPA also requests that it be determined eligible for an award of costs.

OAPPA is a not-for-profit organization whose membership includes physical plant administrators for Ontario universities. The main objective of OAPPA is to promote cooperation among physical plant administrators of the provincially-assisted universities on matters including planning, construction, and operations and maintenance of facilities. Its work on regulatory matters is one of a number of activities undertaken by OAPPA.

The majority of the universities are customers of either Enbridge Gas Distribution or Union Gas. In addition, most of the member universities are non-large final emitters and therefore, will be affected by the outcome of the consultation. For this reason, OAPPA is interested in participating.

OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers in relation to regulated services. Please note that in past proceedings, OAPPA has been determined to be eligible for cost awards. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards (Revised April 24, 2014) is provided in Attachment 1 to this letter.

OAPPA will be assisted in this consultation by Aegent and so requests that all correspondence and documents be directed to:

Valerie Young
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Should you have any questions or require further information, please feel free to contact me.

Yours truly,

[Original signed by]

Valerie Young
Director, Research and Analysis

cc. Paul Martin, OAPPA / Western University (e-mail)
Laurie Klein, OEB (e-mail)
Rachele Levin, OEB (e-mail)

ATTACHMENT 1

ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

Information Required by Section 3.03.1 of the Practice Direction on Cost Awards, Revised April 24, 2014

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College
Brock University
Carleton University
Guelph University
Lakehead University
Laurentian University
McMaster University
Nipissing University
Ontario College of Art and Design University
University of Ottawa
Queen's University

Ryerson University
University of Toronto
University of Toronto – Mississauga
University of Toronto – Scarborough
Trent University
University of Ontario Institute of Technology
University of Waterloo
University of Western Ontario
Wilfred Laurier University
University of Windsor
York University

OAPPA's Mission Statement: To assist higher education facilities officers and staff develop, maintain and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially-assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting such as that required under Ontario Regulation 397/11 (Energy Conservation and Demand Management Plans) and the Greenhouse Gas Emissions Reduction Program. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation focuses primarily on rate and rate-related proceedings of Enbridge Gas Distribution and Union Gas. The majority of OAPPA members are customers of either Enbridge or Union. From an operating perspective, the rate structures, rate levels, and terms and conditions of service of the utilities are of direct importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions by its external advisor, Aegent Energy Advisors Inc. Aegent performs a number of functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the Board. The Chair of the OAPPA Energy Committee is Aegent's primary contact, and the current Chair of this Committee is Mr. Paul Martin, Director – Facilities Management (Business Operations), Western University. Aegent's representative is Valerie Young, Director – Research and Analysis.