



Lisa (Elisabeth) DeMarco
Senior Partner
Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2
TEL +1.647.991.1190
FAX +1.888.734.9459
lisa@demarcoallan.com

May 31, 2019

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

Dear Ms. Walli:

Re: EB-2019-0003 — Post-2020 Natural Gas Demand Side Management Framework Consultation Process

We are counsel to the Association of Power Producers of Ontario (**APPrO**) in the above-mentioned proceeding (the **Proceeding**). A description of APPrO has been recently filed with the Board (see Notice of Intervention in EB-2018-0028). APPrO intends to participate in the Proceeding and requests cost award eligibility pursuant to section 3.03(a) of the Board's *Practice Direction on Cost Awards*.

APPrO is eligible to seek a cost award because APPrO primarily represents the direct interests of consumers in relation to services that are regulated by the Board. APPrO's members include more than 100 companies involved in the generation of electricity in Ontario. Most of APPrO's gas-fired generator members are large volume customers and are some of the largest customers within Enbridge Gas Inc.'s (**Enbridge's**) franchises. These large volume customers individually contract for significant quantities of distribution services from Enbridge. Within the Enbridge system, APPrO members predominately contract for distribution services under Rate 125 and under the prior Union Gas Limited (**Union**) Rate 20, Rate 25, Rate 100, and T2. As a result, APPrO's members have a direct, significant and unique interest in the Proceeding that may be of interest to all customers.

The Board has deemed APPrO an intervenor eligible for costs in previous proceedings. These proceedings include, among others: the DSM Mid-Term Review (EB-2017-0127/EB-2017-0128); Enbridge's 2014-2018 IRM Proceeding (EB-2013-0459); Union's

application for an order or orders approving a one-time exemption from its approved rate schedules to reduce certain penalty charges applied to direct purchase customers who did not meet their contractual obligations (EB-2014-0154); Union's 2013 Rebasing Proceeding (EB-2011-0210); Union's 2014-2018 IRM Proceeding (EB-2013-0202); and Union's and Enbridge's applications for approval of their 2015-2020 DSM plans (EB-2015-0029/EB-2015-0049). APPrO believes it is appropriate for the Board to award APPrO costs in the context of the Proceeding as well.

APPrO intends to participate in-person in the Stakeholder Meeting scheduled for June 13, 2019 and requests that further communications with respect to the Proceeding be sent to the following:

Association of Power Producers of Ontario

Suite 1040
67 Yonge St.
Toronto, ON M5E 1J8

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

DeMarco Allan LLP

Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2

Attention: Lisa (Elisabeth) DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@demarcoallan.com

Attention: Jonathan McGillivray
Telephone: 647-208-2677
Facsimile: 1-888-734-9459
Email: jonathan@demarcoallan.com

Yours very truly,



Lisa (Elisabeth) DeMarco