



Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

April 17, 2020

Dear Ms. Long,

**Re: Enbridge Gas Inc.
Ontario Energy Board File No.: EB-2020-0066
Voluntary Renewable Natural Gas Program Application**

Further to the Ontario Energy Board (“OEB”) Notice to customers of Enbridge Gas Inc. (“EGI”) provided to us on April 8, 2020 and the Board’s *Practice Direction on Cost Awards*, we are writing on behalf of the Canadian Biogas Association (the “CBA”) to request intervenor status and cost award eligibility in relation to EGI’s application for approval of a Voluntary Renewable Natural Gas Program.

Representation and Experts

The CBA proposes to retain counsel to assist with its participation in the proceeding.

Assuming that it is granted intervenor status and cost eligibility, the CBA would ask that (electronic only) copies of the materials be provided to its counsel:

Michael Buonaguro
24 Humber Trail
Toronto, Ontario
M6S 4C1
416-767-1666
mrb@mrb-law.com

We would also ask that I be added to the intervention list on behalf of the CBA (electronic copies):

Jennifer Green
Executive Director
Canadian Biogas Association
275 Slater Street, Suite 900, Ottawa, Ontario K1P 5H9
613 822-1004
jgreen@biogasassociation.ca

Practice Direction and other Funding

The Board has previously provided the CBA intervenor status and found the CBA eligible for costs in similar proceedings, granting the CBA intervenor status and cost eligibility in:

- the Board consultation process with respect to Rate Design for Commercial and Industrial Customers (EB-2015-0043);
- the Board consultation process with respect to its Draft Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans (EB-2017-0129), including having invited a CBA to participate in the Working Group for the consultation, and
- EGI's application for a Renewable Natural Gas Enabling Program (EB-2017-0319)

In accordance with Section 3 of the Board's *Practice Direction on Cost Awards*, the CBA believes that it continues to be eligible for an award of costs in the context of the present proceeding as it represents an interest and policy perspective that is relevant to the Board's mandate generally and with respect to the scope of this proceeding specifically.

As the collective voice of Canada's biogas sector, the CBA is concerned with developing the biogas and RNG industry to its fullest potential through capturing and processing organic materials to maximize the utility and value inherent within that material. Our members span the entire value chain of the sector and consist of farmers, municipalities, and private sector owners and operators of biogas systems, technology suppliers and consultants, financial and learning institutions, utilities, and waste industry and organic residual generators. CBA supports the activities and needs of its members by guiding policy and regulatory developments; building knowledge through exchange of information; raising awareness; and creating networks.

The proposal by EGI to develop a Voluntary Renewable Natural Gas Program falls squarely within the CBA's mandate as an organization, as it specifically relates to providing end use customers with access to renewable natural gas as part of their portfolio of natural gas supply. The CBA respectfully submits that not only is the proposal put forward of specific concern to its members, but that the Board will benefit from the CBA's perspective on the proposal through its participation in the proceeding.

The CBA will consult with other organizations with similar purposes and seek to co-ordinate the various parties' input to the Board to the extent possible given the diversity of perspectives.

The CBA does not currently have access to other funds allocated for this purpose to enable its participation in this initiative.

On the basis of the foregoing, The CBA respectfully requests that the Board approve its request to participate in this proceeding.

Sincerely,



A handwritten signature in blue ink that reads "Jennifer Green".

Jennifer Green
Executive Director
Canadian Biogas Association

cc: egiregulatoryproceedings@enbridge.com
brandon.ott@enbridge.com
dstevens@airdberlis.com