

Low-Income Energy Network

C/o Advocacy Centre for Tenants Ontario 5th floor, 425 Adelaide St. W, Toronto, Ont. M5C 3C1 Voice: 416--597-5820 ext 5174, Fax: 416-597-5821

October 5, 2010 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: Cost award eligibility request in EB-2010-0280—Customer Service Amendments to the Gas Distribution Access Rule

Dear Ms. Walli:

In accordance with the Board's Practice Direction on Cost Awards, the Low-Income Energy Network (LIEN) hereby applies for intervenor status in EB-2010-0280.

LIEN in 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, including those concerning the issue of CDM/DSM.

Nature and scope of intervention

Together with the interests of its numerous individual members and supporting organizations, LIEN has a clear interest in the three components of the Low-income Energy Assistance Program (LEAP): more flexible customer service rules, emergency financial assistance, and conservation. As such, LIEN has a substantial interest in the issues under EB-2010-0280. 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. 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 IndEco Strategic Consulting (IndEco) to provide consulting advice to LIEN in this proceeding. IndEco is an expert in CDM/DSM in Ontario and has been retained for expert advice in many proceedings by LIEN, and other clients, related to CDM/DSM.

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 M6K 3E3

Attention: Judy Simon Tel.: 416.204.0357

Email: jsimon@indeco.com

Attention: Shona Adamson

Tel.: 416.204.0359

Email: sadamson@indeco.com

Attention: Amy Snook Tel.: 647.259.9485

Email: asnook@indeco.com

Sincerely,

Zeenat Bhanji, Coordinator

Advocacy Centre for Tenants Ontario 425 Adelaide St. W, 5th floor

Toronto, ON M5C 3C1

Tel. 416.597.5855 ext 5167

Fax 416.597.5821