

Direct Dial: (416) 862-4836
File: 5576

By Electronic Mail, Courier and RESS Filing

February 2, 2011

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervenor Status and Cost Eligibility Request on Behalf of the Low-Income
Energy Network (LIEN)
Board File No. EB-2011-0011 - Toronto Hydro 2011-14 CDM Programs**

We are counsel to the Low-Income Energy Network (LIEN). In accordance with the Board's Practice Direction on Cost Awards, LIEN hereby applies for intervenor status in the EB-2011-0011 Toronto Hydro 2011-14 CDM Programs hearing.

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 CDM 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 issues of conservation and environmental sustainability.

NATURE AND SCOPE OF INTERVENTION

Together with the interests of its numerous individual members and supporting organizations, LIEN has a clear interest in the development of verified conservation/energy efficiency resources in Ontario, ensuring sustainability in Ontario's energy supply, and the impact on low-income consumers resulting from implementation of Toronto Hydro's CDM Programs. As such, LIEN has a substantial interest in the issues under EB-2011-0011 Toronto Hydro 2011-14 CDM Programs proceeding.



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. LIEN's membership may be impacted by the outcome of this proceeding if, for example, there is little or no consideration of the low-income component in the CDM programs for which Toronto Hydro is seeking approval, particularly programs targeting residential housing.

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 on energy policy and conservation in Ontario and has been retained for expert advice in many proceedings by LIEN, and other clients, related to these issues.

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

LIEN Steering Committee, Legal Subcommittee
130 Spadina Avenue Suite 301
Toronto, ON M5V 2L4

Attention: Theresa McClenaghan
(416) 906-2284
Email: theresa@cela.ca

Willms & Shier Environmental Lawyers LLP
4 King Street West, Suite 900
Toronto, ON M5H 1B6

Attention: Juli Abouchar
(416) 862-4836
Email: jabouchar@willmsshier.com

Attention: Matthew Gardner
(416) 862-4825
Email: mgardner@willmsshier.com

IndEco Strategic Consulting
77 Mowat Avenue, Suite 412
Toronto, ON M6K 3E3



Attention: Judy Simon

Tel.: 416.204.0357

Email: jsimon@indeco.com

Yours truly,

A handwritten signature in blue ink, reading 'Juli Abouchar'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Juli Abouchar

Partner

*Certified as a Specialist in Environmental Law
by the Law Society of Upper Canada*

cc client
 intervenors

Document #: 394705