

October 26, 2011

Sent by E-mail and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Your reference

Our reference

 **NORTON ROSE**

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On June 1, 2011, Ogilvy Renault joined Norton Rose Group.

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Dear Ms. Walli:

Union Gas Limited 2012-2104 Demand Side Management Plan (EB-2011-0327)

The Association of Power Producers of Ontario ("APPRO") respectfully requests intervenor status in the above-noted proceeding.

Please do not hesitate to contact me should you have any questions or concerns.

Yours very truly,



John Beauchamp

JB/mnm

cc: M. Redford (Union Gas Limited)
C. Smith (Counsel for Union Gas Limited)
D. Butters (APPRO)
J. Wolnik (Elenchus Research Associates Inc.)

DOCSTOR: 2285353\1

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15
(Sched. B);

AND IN THE MATTER OF an application by Union Gas Limited seeking approval
of its 2012-2014 Demand Side Management plan.

**NOTICE OF INTERVENTION OF
ASSOCIATION OF POWER PRODUCERS OF ONTARIO ("APPrO")**

October 26, 2011

John Beauchamp

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200 Bay Street

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1. APPrO hereby requests intervenor status in the above-noted proceeding.
2. APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO members produce power from natural gas, as well as hydro, gas, coal, nuclear, wind, waste wood and other sources.
3. On September 23, 2011, Union Gas Limited ("Union") filed an application (the "Application") with the Ontario Energy Board (the "Board") under section 36 of the *Ontario Energy Board Act, 1998*, S.O. c.15, Sched. B, as amended, for an order or orders effective January 1, 2012 approving Union's Demand Side Management ("DSM") plan for the years 2012, 2013 and 2014. Union is also seeking an interim order if a Board decision cannot be released by November 15, 2011 for the 2012 DSM budgets, Resource Acquisition Programs, and Low-Income Program.
4. As stated in the Application, those customers to whom Union sells gas, or on whose behalf Union transmits or stores gas will be affected by Union's proposals. Many of APPrO's members are large volume customers of Union and will be affected by the cost impacts associated with the Application. As a result, APPrO's members have a direct and significant interest in this proceeding.
5. Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, APPrO also intends to seek an award of costs from Union as a customer of the Applicant. In accordance with s. 3.03(a) of the Board's Practice Direction on Cost Awards, APPrO represents the direct interests of consumers in relation to Union's regulated services (APPrO's members are among the largest consumers of Union's services).
6. APPrO reserves the right to participate in all aspects of the proceeding and hereby requests that the Board, Union and any other intervenors provide it and its counsel with copies of all evidence and correspondence related to the proceeding, at the contact information below:

APPrO

25 Adelaide St. East
Suite 1602
Toronto, ON M5C 3A1

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

AND

Norton Rose OR LLP

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Attention: John Beauchamp
Telephone: 416-216-1927
Facsimile: 416-216-3930
Email: john.beauchamp@nortonrose.com

AND

Elenchus Research Associates Inc.

34 King Street East
Toronto, ON, M5C 2X8

Attention: John Wolnik
Telephone: 519-474-0844
Facsimile: 416) 348-9930
E-mail: jwolnik@elenchus.ca

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
26th day of October, 2011

A handwritten signature in dark ink, appearing to read "John Beauchamp", is written over a horizontal line.

John Beauchamp
Norton Rose OR LLP
Counsel for APPRO