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By Electronic Mail, Courier and RESS Filing

October 28, 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: Request for Intervenor Status on Behalf of Bullfrog Power Board File No. EB-2011-0283 - Union Gas Ltd. - Renewable Gas Application Board File No. EB-2011-0242 - Enbridge Gas Distribution Inc. - Renewable Gas Application

We are counsel to Bullfrog Power. Please accept this letter as Bullfrog Power's request for intervenor status in the above-noted proceedings.

BACKGROUND

Bullfrog Power is a licensed electricity retailer in Ontario and provides customers a 100% renewable electricity choice for their electricity. Bullfrog Power's mission is to provide Canadians with easy and practical renewable energy solutions for their homes, businesses, and transportation.

Bullfrog is also a licensed natural gas marketer. Earlier this year, Bullfrog launched Canada's first renewable natural gas offering.

The renewable natural gas offered by Bullfrog is produced at a landfill gas project in Quebec. Bullfrog's facilities meet strict environmental standards as defined by ICF International. The facility injects green natural gas into the natural gas pipeline system to match the amount of conventional natural gas that Bullfrog's customers use. These consumers will have no other representation in the Renewable Gas Application hearing if Bullfrog does not represent their interests.

NATURE AND SCOPE OF INTERVENTION

Bullfrog has a significant interest in this proceeding. Bullfrog has extensive experience as a retailer in the green electricity market. Bullfrog is currently the only marketer in Canada of a renewable natural gas offering. What is decided in this hearing will directly affect Bullfrog and its customers.

Bullfrog is also the only renewable natural gas marketer with experience in setting a price for renewable natural gas. For these reasons, Bullfrog is well-positioned to provide effective and valuable insight to the Board in this hearing.



The stated goal of Union Gas and Enbridge Gas in this proceeding is to build a renewable gas market. It is therefore important and necessary that market players such as Bullfrog be heard.

Bullfrog represents two interests that would otherwise be unrepresented or underrepresented in this hearing: the interests of renewable natural gas consumers, and the public interest of encouraging the procurement of renewable natural gas in the province.

Bullfrog intends to participate in a focused and strategic manner which will include cross-examination and submissions to the Board on the issues that relate to Bullfrog and its customers. In addition, we expect that Bullfrog will submit written and/or oral evidence.

Bullfrog is not seeking an award of costs in this proceeding. Bullfrog will make every effort to cooperate and coordinate with other intervenors in the hearing.

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

Bullfrog Power Inc. 119 Spadina Avenue, Suite 1000 Toronto, ON M5V 2L1

Attention: Tom Heintzman, President (416) 360-3464 Email: tom.heintzman@bullfrogpower.com

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: <u>mgardner@willmsshier.com</u>

Yours truly,

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Juli Abouchar Partner Certified as a Specialist in Environmental Law by the Law Society of Upper Canada

cc client intervenors applicant Document #: 471124