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File: 5565

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December 1, 2011

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> 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-2011-0295 - Enbridge Gas Distribution Inc. 2012-14 DSM Plan**

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We are counsel to the Low-Income Energy Network (LIEN). In accordance with the Board's Practice Direction on Cost Awards, LIEN hereby applies to intervene in the EB-2011-0295 Enbridge Gas 2012-14 Demand Side Management Plan proceeding.

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 DSM to provide 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 Enbridge Gas Distribution Inc. ("Enbridge")'s DSM Plan. In particular, LIEN has a substantial interest in Enbridge's application for approval of the Low Income Program, budget and incentive mechanism related thereto in this 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.



## 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 similar proceedings before the Board, including Union Gas Ltd.'s application for approval of its 2012-14 Demand Side Management Plan (EB-2011-0327).

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 Judy Simon of Elenchus to provide consulting advice to LIEN in this proceeding. Judy Simon is an expert 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:

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](mailto:jabouchar@willmsshier.com)

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

Elenchus  
34 King Street East, Suite 1600  
Toronto, ON M5C 2X8

Attention: Judy Simon  
(416) 348-9917  
Email: [jsimon@elenchus.ca](mailto:jsimon@elenchus.ca)

Yours truly,

A handwritten signature in black ink, appearing to read "Matt F. Gardner".

Matthew Gardner

cc client  
intervenor