

March 14, 2012

**Filed on RESS and Sent by Courier**

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



Barristers & Solicitors / Patent & Trade-mark Agents

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On January 1, 2012, Macleod Dixon joined  
Norton Rose OR to create Norton Rose Canada.

Your reference

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01015413-0027

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Dear Ms. Walli:

**Enbridge Gas Distribution Inc. – 2013 Rate Application (EB-2011-0354)**

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,

*“Signed”*

John Beauchamp

JB/mnm

cc: N. Ryckman (Enbridge Gas Distribution Inc.)  
F. Cass (Aird & Berlis)  
D. Butters (APPrO)  
J. Wolnik (Elenchus Research Associates Inc.)

DOCSTOR: 2375006\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 Enbridge Gas Distribution Inc., pursuant to section 36 of the *Ontario Energy Board Act, 1998* for an order of the Board approving or fixing rates for the sale, distribution, transmission and storage of natural gas, commencing January 1, 2013.

**NOTICE OF INTERVENTION OF  
ASSOCIATION OF POWER PRODUCERS OF ONTARIO (“APPrO”)**

**March 14, 2012**

**John Beauchamp**

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1. Enbridge Gas Distribution Inc. (“Enbridge”) served the Notice of Application for EB-2011-0354 by email on APPrO on March 5, 2012. 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 January 31, 2012, Enbridge filed an application for an order of the Board approving or fixing rates for the sale, distribution, transmission and storage of natural gas, commencing January 1, 2013.
4. APPrO’s membership includes most of Ontario’s natural gas fired power generators. These generators are large volume customers of gas LDCs. Indeed, a number are large volume customers of Enbridge and will be affected by the bill impacts associated with Enbridge’s proposals. 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 Enbridge 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 Enbridge’s regulated services (APPrO’s members are among the largest consumers of Enbridge’s services). APPrO has participated in many hearings and consultations before the Ontario Energy Board involving natural gas-related matters.
6. APPrO represents the direct interests of gas-fired generators who are ratepayers in relation to the regulated services provided by Enbridge. APPrO also has a record of participating in Board proceedings in a responsible and efficient manner. The Board has previously found APPrO to be eligible for cost awards in other proceedings including, among others: the Natural Gas Electricity Interface Review proceeding; the combined proceeding for 2008 rates for Enbridge and Union Gas Limited; and Union Gas Limited’s recent 2013 rebasing application. It is appropriate for the Board to do so again in the context of this proceeding, in light of the issues that this proceeding raises.
7. APPrO reserves the right to participate in all aspects of the proceeding and hereby requests that the Board, Enbridge 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](mailto:david.butters@appro.org)

AND

Norton Rose Canada LLP  
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Attention: John Beauchamp  
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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](mailto:jwolnik@elenchus.ca)

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS  
14<sup>th</sup> day of March, 2012

*“Signed”*

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John Beauchamp  
Norton Rose Canada LLP  
Counsel for APPrO