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August 6, 2013

Delivered by Email and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. – 2014-2018 Rate Application
Board File No. EB-2012-0459**

We are counsel to the Association of Power Producers of Ontario (“APPrO”) in the above-captioned matter. Please find attached APPrO’s Notice of Intervention in this proceeding. Paper copies of this letter and the accompanying Notice will be delivered to you by courier.

Should you have any questions or require further information in this regard, please do not hesitate to contact me.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Original signed by James C. Sidlofsky

James C. Sidlofsky

cc: David Butters, APPrO
Norm Ryckman, Enbridge Gas Distribution
Fred Cass, Aird & Berlis LLP

TOR01: 5299178: v1

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

AND IN THE MATTER OF an Application by Enbridge Gas Distribution Inc. for an Order or Orders approving or fixing rates for the sale, distribution, transmission and storage of gas commencing January 1, 2014.

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

AUGUST 6, 2013

APPrO:

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AND

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INTRODUCTION:

1. Enbridge Gas Distribution Inc. (“Enbridge”) has filed an application with the Ontario Energy Board under section 36 of the *Ontario Energy Board Act, 1998*, as amended, for an Order or Orders approving or fixing rates for the sale, distribution, transmission and storage of gas as of January 1, 2014.
2. Enbridge is seeking approval of rates for a five year period based on a methodology described in its Application.
3. APPrO hereby requests intervenor status in this proceeding.

INTEREST OF THE INTERVENOR:

4. 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.
5. Among APPrO’s members are gas-fired generators in Enbridge’s franchise area. These generators take service from Enbridge primarily under Rate 125. The evidence filed by Enbridge indicates that rate 125 is forecasted to increase minimally in the first year, followed by significant increases over the balance of the five year period proposed by Enbridge. The annual changes in projected by Enbridge (exclusive of any site restoration cost credits) are:

2014:	(0.8)% (Ex H1 Tab1 S1 page 3)
2015:	2.1% (Ex H3 Tab1 S1 Appendix A)
2016:	10.0% (Ex H3 Tab1 S1 Appendix A)
2017:	9.9% (Ex H3 Tab1 S2 Appendix A)
2018:	9.9 % (Ex H3 Tab1 S2 Appendix A)
6. All customers in the Rate 125 rate class are power generators and not represented by any other consumer group.
7. These increases will have a materially negative impact on generators. As a result,

APPrO's members have a direct and significant interest in this proceeding.

SCOPE OF PARTICIPATION:

8. APPrO reserves the right to participate in all aspects of the proceeding, including, without limitation, matters related to the rate making methodology being proposed by Enbridge and the basis and the reasonableness of rate 125 over the subject period. APPrO also reserves the right to present evidence as it may deem necessary.

COSTS:

9. Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, APPrO intends to seek an award of costs from Enbridge. 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 the largest consumers of Enbridge's services).
10. APPrO has a record of participating in Board proceedings in a responsible and efficient manner and the Board determined that APPrO was eligible for cost awards in other proceedings, including Union and Enbridge rates cases; and several natural gas proceedings that had unique impacts on power generators (including, among others, NGEIR and storage allocation proceedings). APPrO believes it is appropriate for the Board to do so again in the context of this proceeding and in light of the potential impacts of the Application on APPrO's members.

COUNSEL/REPRESENTATIVES

11. APPrO requests that the Board, Enbridge and all intervenors provide it and its counsel and consultant with copies of all evidence and correspondence related to the proceeding, at the contact information below. APPrO asks that Enbridge deliver paper and electronic copies of its Application and all of its prefiled evidence to each of the individuals shown below. Electronic versions of other filings in this matter will be satisfactory to APPrO at this time.

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ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 6TH DAY OF AUGUST, 2013

BORDEN LADNER GERVAIS LLP

Per:

Original Signed by James C. Sidlofsky
James C. Sidlofsky
Counsel to APPrO