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April 11, 2014

Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervenor Status and Cost Eligibility Request for Low-Income Energy Network  
Board File No. EB-2012-0410 - Rate Design for Electricity Distributors**

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We are counsel for the Low-Income Energy Network (LIEN). LIEN requests intervenor status in the above-mentioned proceeding and seeks eligibility for a cost award.

**LOW-INCOME ENERGY NETWORK**

LIEN represents 60 member groups across Ontario. 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 and providing low-income consumers the opportunity to better manage their energy bills. In so doing LIEN addresses customer care matters, commodity prices and rates, and DSM/CDM matters. LIEN helps to ensure that low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

**NATURE AND SCOPE OF INTERVENTION**

Low-income consumers will be affected by this proceeding. The Board proposes three different rate design options to achieve revenue decoupling. These fixed rate design options will have different impacts on low-income consumers, but all three will have an impact on their rates going forward.

The fixed rate design options proposed by the Board will have a major impact on the quantum that low-income consumers will have to pay through distribution rates, and the ability of low-income consumers to pay these rates.

LIEN participated in the earlier revenue decoupling proceeding to assist the Board.

LIEN intends to prepare and file a written submission and attend any stakeholder group meetings.

## 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 many other proceedings before the Board.

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 stakeholders to avoid duplication where possible. LIEN has retained Judy Simon & Associates Inc. 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.

We request that counsel (Ms. Julie Abouchar and Mr. Matt Gardner) and Ms. Judy Simon, consultant to LIEN, be listed on the intervenors' list under LIEN, since this makes the later distribution of updates more effective.

Ms. Simon is located at:

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Yours truly,



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