



ENERGY ADVISORS INC.

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October 16, 2014

Via RESS and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

RE: Union Gas Limited
2015 Rates Application
Ontario Energy Board File Number: EB-2014-0271

Letter of Intervention - Ontario Association of Physical Plant Administrators (OAPPA)

Aegent Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators to assist the association on matters related to the above-noted application. Aegent is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as an intervenor in the EB-2014-0271 proceeding and provides the following information:

1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario, a number of whom are distribution customers of Union Gas. As a result, certain OAPPA member universities will be directly affected by the outcome of this proceeding. Therefore, Union's application for 2015 rates is of direct interest to OAPPA.
2. OAPPA participated in the process that resulted in the settlement agreement setting out Union's 2014-2018 Incentive Rate Mechanism that was approved by the Board in EB-2013-0202 and that forms the basis for the 2015 rates application.
3. OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.
4. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards (Revised April 24, 2014) is provided in Attachment 1 to this letter.

5. OAPPA requests that all correspondence and documents be directed to:

Valerie Young
Director, Research and Analysis
Aegent Energy Advisors Inc.
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A copy of this letter is being delivered to Union Gas as indicated below.

Should you have any questions, please feel free to contact me.

Yours truly,

[Original signed by]

Valerie Young
Director, Research and Analysis

cc. Chris Ripley, Union Gas (e-mail)
Crawford Smith, Torys (e-mail)
Hugh Briggs, OAPPA / Lakehead University (e-mail)

ATTACHMENT 1

ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

Information Required by Section 3.03.1 of the Practice Direction on Cost Awards, Revised April 24, 2014

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College
Brock University
Carleton University
Guelph University
Lakehead University
Laurentian University
McMaster University
Nipissing University
Ontario College of Art and Design University
University of Ottawa
Queen's University

Ryerson University
University of Toronto
University of Toronto – Mississauga
University of Toronto – Scarborough
Trent University
University of Ontario Institute of Technology
University of Waterloo
University of Western Ontario
Wilfred Laurier University
University of Windsor
York University

OAPPA's Mission Statement: To assist higher education facilities officers and staff develop, maintain and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially-assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting such as that required under Ontario Regulation 397/11 (Energy Conservation and Demand Management Plans) and the Greenhouse Gas Emissions Reduction Program. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation focuses primarily on the rate proceedings of Enbridge Gas Distribution and Union Gas. The majority of OAPPA members are customers of either Enbridge or Union. From an operating perspective, the rate structures, rate levels, and terms and conditions of service of the utilities are of direct importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions by its external advisor, Aegent Energy Advisors Inc. Aegent performs a number of functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the Board. The Chair of the OAPPA Energy Committee is Aegent's primary contact, and the current Chair of this Committee is Mr. Hugh Briggs, Director – Physical Plant, Lakehead University. Aegent's representative is Valerie Young, Director – Research and Analysis.