

IN THE MATTER OF the *Ontario Energy Board Act 1998*,
Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by Union Gas
Limited for an Order or Orders approving its demand side
management plan for the six years commencing January 1, 2015.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:

http://www.ontarioenergyboard.ca/oeb/Documents/Intervenor_Filings/SEC_2014_annual_intervenor_filing_20140602.pdf
3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

Issues to be Addressed

4. SEC’s intended participation will focus on the following issues:
 - a. The programs proposed for implementation in each of the years of the DSM plan, including the targets markets, potential and achievable benefits, related costs, efficiency of delivery, comparison to other leading jurisdictions, and all other aspects of program design and implementation, with a particular emphasis on how program design and delivery has evolved to ensure that school boards and similarly-situated customers can participate;
 - b. The components, totals and structure of the proposed budgets for DSM, including any formulae used to adjust costs over time, and including impacts on ratepayers and identifiable groups of ratepayers;
 - c. The proposed shareholder incentives, including formulae, amounts, targets and weighting;
 - d. The methods proposed for evaluation, measurement and verification of results, whether for incentive purposes or otherwise, and the proposed governance structure for such assessment and auditing processes;

- e. The proposed methods and processes to deal with lost revenue and spending overruns or shortfalls;
- f. All mechanisms related to productivity, cost efficiency, and similar aspects of the multi-year plan;
- g. The methodology and details of the proposed allocation of costs to classes, and design of rates within classes to recover those costs;
- h. The extent to which the outcomes proposed in the Application represent value for money for ratepayers, particularly school boards; and
- i. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

5. The School Energy Coalition intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearing of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order.
6. SEC has not made a final determination as to whether it will lead evidence in this proceeding. Both expert and non-expert evidence is under consideration, and SEC will advise the Board and parties in a timely factor if it has determined to lead evidence.

Nature of Hearing Requested

7. Given the complexity and nature of the Application, SEC believes an oral hearing is more appropriate in this proceeding.

Counsel/Representative

8. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:
 - a. School Energy Coalition: (electronic copies only)

ONTARIO EDUCATION SERVICES CORPORATION
c/o Ontario Public School Boards Association
439 University Avenue, 18th Floor
Toronto, ON
M5G 1Y8

Attn: Wayne McNally, SEC Coordinator
Phone: 416 340-2540
Fax: 416 340-7571
Email: wmcnally@opsba.org

b. SEC's lead counsel: (both electronic and paper copies)

JAY SHEPHERD PROFESSIONAL CORPORATION

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Attn: Jay Shepherd

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c. SEC's co-counsel: (electronic copies only)

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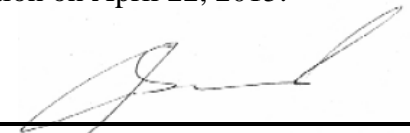
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Respectfully submitted on behalf of the School Energy Coalition on April 22, 2015.



Jay Shepherd
Counsel for School Energy Coalition