

May 1, 2015

BY COURIER (2 COPIES) AND RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700, P.O. Box 2319
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0049 Enbridge Gas Distribution Inc. (“Enbridge”)
EB-2015-0029 Union Gas Limited (“Union”)
2015-2020 Demand Side Management (“DSM”) Plans**

We are writing on behalf of Environmental Defence to request intervenor status and costs eligibility in this combined proceeding.

Environmental Defence seeks intervenor status and costs eligibility as a leading environmental organization that represents both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through increased conservation and other means.

Environmental Defence

Environmental Defence is a frequent intervenor at the Ontario Energy Board and has filed an Annual Information Filing for frequent intervenors.¹ The Annual Information Filing contains information regarding Environmental Defence such as its mandate and objectives, the constituency it represents, and the types of programs and activities it carries out.

Nature and Scope of Intended Participation and Interest in Proceeding

Environmental Defence wishes to file interrogatories, participate in the hearing, review and test the evidence, make submissions, and seek a cost award. Environmental Defence will likely also submit its own evidence in this proceeding. Environmental Defence’s interest in this proceeding is in promoting both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through conservation and other means.

Environmental Defence wishes to address whether the DSM plans are consistent with the Minister of Energy’s binding directive dated March 26, 2014, requiring the achievement of all cost-effective DSM.

¹ <http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/rec/450031/view/>

Requests for Evidence and Addresses of Representative

Environmental Defence requests that copies of the pre-filed materials and all other documents in the proceeding be delivered to the following consultant and counsel:

Paper and electronic copies to:

Jack Gibbons
Ontario Clean Air Alliance
160 John Street, Suite 300
Toronto, Ontario M5V 2E5
Tel: (416) 260-2080 ext. 2
Fax: (416) 598-9520
E-mail: jack@cleanairalliance.org

Electronic copies to:

Murray Klippenstein – murray.klippenstein@klippensteins.ca
Kent Elson – kent.elson@klippensteins.ca
Kiel Ardal – kiel.ardal@klippensteins.ca

Klippensteins
Barristers & Solicitors
160 John Street, Suite 300
Toronto, Ontario M5V 2E5
Tel: (416) 598-0288
Fax: (416) 598-9520

We also request that the above individuals be listed on the intervenors' list under Environmental Defence.

Address of Environmental Defence

Environmental Defence's full name and address is:

Environmental Defence Canada Inc.
116 Spadina Avenue, Suite 300
Toronto, Ontario M5V 2K6
Tel: (416) 323-9521
Fax: (416) 323-9301

However, please send correspondence and any other materials to both Jack Gibbons and to counsel as the authorized representatives.

Oral Hearing

Environmental Defence requests that an oral hearing be held in light of the importance and complexity of the issues at stake. In our submission, a written hearing would not provide an adequate opportunity to address these important and complex issues.

Service on other Parties

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,



Kent Elson

cc: Applicants