

May 5, 2015

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

Dear Ms. Walli:

**Re: Combined Proceeding - EB-2015-0029/EB-2015-0049 - Union Gas Limited and Enbridge Gas Distribution Inc. – Demand Side Management Plans - 2015-2020**

I am a consultant to the Consumers Council of Canada ("Council"). I have been instructed by my client to intervene in the combined proceeding to consider the Applications to the Ontario Energy Board ("OEB") by Union Gas Limited ("Union") and Enbridge Gas Distribution Inc. ("EGD") for approval of their Demand Side Management ("DSM") plans for six years commencing January 1, 2015. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board's order in this proceeding will ultimately impact the rates that residential consumers pay for the delivery of natural gas and the DSM.

On June 23, 2014, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board's Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

The nature and scope of the Council's intended participation in the proceeding will be the following:

1. To test the Applicants' evidence specifically with respect to assessing the appropriateness of the proposals and their impacts on residential consumers;
2. To consider the proposed program designs, budgets, targets and plan implementation;
3. To consider the structure of the proposed shareholder incentives and the methods for the evaluation, measurement and verification of results;
4. To consider all other aspects of the utilities' proposals included in their applications and further issues that may arise during the proceeding; and
5. To participate in the various stages of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and an oral hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many of the applications of Union and EGD over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all Board Notices and hard copies of the Applicant's evidence should be sent to me, at 62 Hillsdale Avenue East, Toronto, Ontario, M4S 1T5. My telephone number is 416-322-7936 and my e-mail is [jgirvan@uniserve.com](mailto:jgirvan@uniserve.com). In addition, please include my colleague Ruth Greey on the distribution

list for all material related to this proceeding. Her address is 147 Yonge Blvd., Toronto, Ontario, M5M 3H3. Her e-mail address is [rgreey@gmail.com](mailto:rgreey@gmail.com).

Please let us know if any further information from the Council is required at this time.

Yours truly,

*Julie E. Girvan*

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CC: Ken Whitehurst, Consumers Council of Canada  
Union Gas, Regulatory Affairs  
Enbridge, Regulatory Affairs