

Sent by Electronic Mail and RESS Filing

May 21, 2015

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (“OSEA”) Application for Intervenor Status
Board File No. EB 2015-0029 and EB 2015-0049**

We are counsel for OSEA. OSEA requests intervenor status in the applications by Union Gas Limited and Enbridge Gas Distribution Inc. for approval of Demand Side Management (“DSM”) Plans for the period of 2015 to 2020 (EB-2015-0029 and EB-2015-0049, respectively). OSEA also seeks eligibility for a cost award.

REASON FOR LATE INTERVENTION REQUEST

OSEA recently experienced a change in leadership which delayed this submission. OSEA respectfully request that the Board consider OSEA’s application for intervenor status.

OSEA’S EXPERIENCE AS AN INTERVENOR

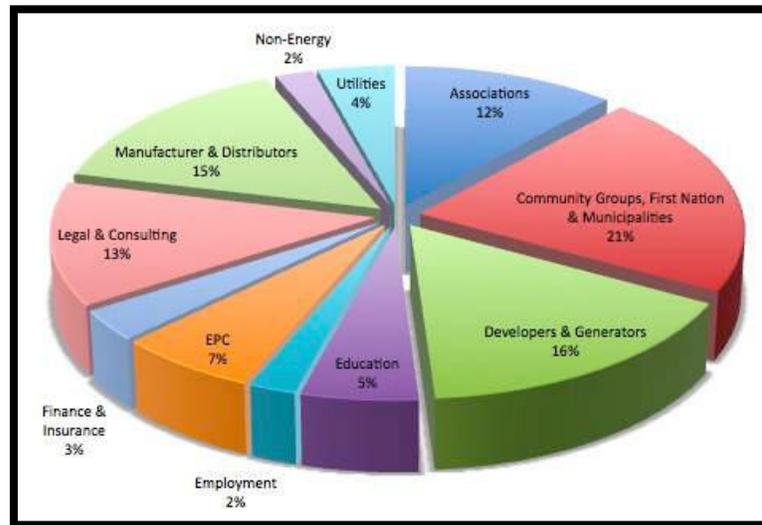
OSEA actively participates in Board proceedings and was granted intervenor status by the Board in previous hearings. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA contributed fully in that matter and believes it can continue to offer assistance and insight to the Board in such matters.

NATURE AND SCOPE OF OSEA’S INTENDED PARTICIPATION

OSEA intends to be an active participant in this proceeding, and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. OSEA intends to participate to request information, participate in any requisite motions, test evidence through the stipulated processes, submit written interrogatories and provide argument in accordance with the Board’s procedures stipulated for this proceeding.

OSEA AND ITS INTEREST IN THE PROCEEDING

- 1 OSEA is a province-wide, non-profit organization centred on the vision of sustainable energy development. OSEA promotes the view that every Ontarian can be a conserver and generator of sustainable energy. OSEA is a public interest organization that works towards a sustainable energy future. This includes ensuring funding and rates that encourage both conservation and the incorporation of green energy.
- 2 OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies. Its membership consists of several non-profit/community organizations that advocate for a variety of interest groups including ratepayers. OSEA is not an association for energy generators. OSEA's membership is diverse with less than 16% being generators.



- 3 OSEA is Ontario's lead advocate, facilitator and catalyst for sector transformation and the transition to a more sustainable energy economy.
- 4 OSEA serves as an advocate for individuals, manufacturers, installers, developers, municipalities, First Nations, unions, farmers, co-operatives and other community organizations, NGO's and other associations supportive of, and engaged in, the full portfolio of sustainable energy solutions.
- 5 Sustainability refers to meeting our own needs and improving the quality of our lives while ensuring the ecological system that sustains us is healthy and capable of supporting future generations.
- 6 Sustainable energy involves the effective and efficient production and use of energy from an array of distributed sources matched in scale and quality to the end use. It isn't just about more

electricity. It is about producing and using energy in a way that meets our needs and improves the quality of our lives while also ensuring that the ecological system that sustains us, our economy and society remains healthy and capable of supporting future generations indefinitely.

7 Sustainable energy includes:

- conservation, energy efficiency and demand management
- renewable heat and electricity generation
- high efficiency combined heat and power (CHP) and district energy
- energy storage
- green buildings
- smart-grids
- transportation that is powered by hydrogen, electricity, human or animal energy, and other non-fossil fuels, and
- community, public and commercial ownership of these structures

REQUEST FOR WRITTEN EVIDENCE

OSEA requests that a copy of the written evidence upon which the Applications are based be provided to its consultant and counsel.

ORAL VS. WRITTEN HEARING

OSEA prefers an oral hearing for this proceeding.

COSTS

OSEA seeks approval of costs in this proceeding. OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute or impede energy conservation and sustainable energy development for Ontario. OSEA's members, both individuals and organizations are interested in the development of sustainable energy in Ontario as consumers, individuals and citizens of Ontario. OSEA has been awarded costs by the Board in previous hearings, and the Board recognized that OSEA can provide "an important and unique perspective in the matter" in EB 2011-0118. OSEA can continue to provide an important and unique perspective in the current proceeding. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.



OSEA's counsel and consultant in this matter are:

Joanna Vince/Robert Woon
jvince@willmsshier.com / rwoon@willmsshier.com
Willms & Shier Environmental Lawyers LLP
4 King Street West, Suite 900
Toronto, ON Canada, M5H 1B6
T: 416-862-4830 / 416-862-4871
F: 416-863-1938

Marion Fraser, Consultant
marion.fraser@rogers.com
Fraser & Company
502-33 Harbour Square
Toronto, ON Canada, M5J 2G2

Yours truly,

Joanna Vince

cc: Nicole Risse, OSEA
Marion Fraser, Fraser & Company

Document #: 852886