

Sent by Electronic Mail and RESS Filing

January 9, 2017

Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervenor Status and Cost Eligibility Request for Low-Income Energy Network Board File No. EB-2016-0300, EB-2016-0296 and EB-2016-0330
Enbridge Gas Distribution Inc., Union Gas Limited and Natural Resource Gas Limited - Cap and Trade Natural Gas Compliance Plans**

We are counsel for the Low-Income Energy Network (“LIEN”). LIEN requests intervenor status in the above-mentioned proceeding and seeks eligibility for a cost award.

LOW-INCOME ENERGY NETWORK

LIEN represents 60 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN’s focus is on reducing the energy bills of all low-income consumers and providing low-income consumers with the opportunity to better manage their energy bills. In so doing, LIEN addresses customer care matters, commodity prices and rates, and DSM/CDM matters. LIEN helps to ensure that low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

NATURE AND SCOPE OF INTERVENTION

LIEN intends to intervene in this proceeding for the following reasons:

- ◆ LIEN intervened in the Board’s development of the Board’s Cap and Trade Natural Gas Framework (the “Framework”) under the *Climate Change Mitigation and Low-carbon Economy Act, S.O. 2016, c.7*. Pursuant to the Framework, Enbridge Gas Distribution Inc., Union Gas Limited and Natural Resource Gas Limited (the “Utilities”) have filed Compliance Plans with the Board, each of which includes proposed measures that will impact the rates low-income natural gas consumers pay for natural gas.

- ◆ LIEN intends to intervene in this proceeding to assist the Board to ensure that
 - measures proposed by the Utilities in their Compliance Plans strike a reasonable balance between greenhouse gas reduction and impacts increased rates will have on low-income natural gas consumers
 - GHG abatement activities result in improved access to services, information and programs for low-income Ontarians, and
 - the interests of low-income natural gas consumers are represented in this proceeding.

LIEN intends to participate in all aspects of the proceeding, including interrogatories, technical conferences, settlement conferences, hearings (whether oral or written) and any other procedural steps. LIEN does not yet have a preference as to whether a hearing should proceed orally or in writing.

COSTS

LIEN requests that the Board find it eligible for costs under section 3.03 (a) of the Board's Practice Direction on Cost Awards. LIEN "primarily represents the direct interests of residential consumers in relation to regulated services." LIEN has been accepted as a party eligible for an award of costs in many other proceedings before the Board.

As a not-for-profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other stakeholders to avoid duplication where possible.

We request that counsel (Mr. Matt Gardner and Ms. Nicole Petersen), as well as Ms. Theresa McClenaghan (theresa@cela.ca) and Ms. Barbora Grochalova (barbora@cela.ca) of CELA (members of LIEN's legal subcommittee) be listed on the intervenors' list under LIEN, since this makes the later distribution of updates more effective.

Mr. Gardner and Ms. Petersen are located at:

Willms & Shier Environmental Lawyers LLP
4 King Street West
Suite 900
Toronto, ON M5H 1B6

Matt Gardner:
(416) 862-4825
Email: mgardner@willmsshier.com



Nicole Petersen:
(416) 642-4872
Email: npetersen@willmsshier.com

Yours truly,

A handwritten signature in blue ink that reads "Matt F. Gardner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matt Gardner

Document #: 1139147