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February 16, 2017

Ontario Energy Board P.O. Box 2319 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 2016-0246** 

We are counsel for OSEA. OSEA requests intervenor status in Enbridge Gas Distribution Inc. and Union Gas Limited's joint application for approval of new and updated Demand Side Management ("DSM") measures and the Technical Reference Manual ("TRM"). OSEA also seeks eligibility for a cost award.

#### 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 and more recently in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2014 DSM deferral and variance accounts (EB-2015-0267 and EB-2015-0276) as well as the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049). OSEA contributed fully in these matters 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

- 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.
- 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.
- 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 application is based be provided to OSEA's consultant and counsel.

#### ORAL VS. WRITTEN HEARING

OSEA does not object to the Board's intention to proceed by way of a written 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 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.



# **REPRESENTATIVES**

OSEA's counsel and consultant in this matter are:

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Yours truly,

Joanna Vince

cc: Nicole Risse, OSEA

Marion Fraser, Fraser & Company

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