

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an order or orders clearing certain non-commodity related deferral accounts and sharing utility earnings pursuant to a Board-approved earnings sharing mechanism.

**NOTICE OF INTERVENTION**

**OF THE**

**SCHOOL ENERGY COALITION**

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:  
  
<http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/rec/462191/view/>
3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

**Issues to be Addressed**

4. SEC’s intended participation will focus on the following issues:
  - a. The reasonableness of the amounts in the deferral and variance accounts;
  - b. Proposed 2016 utility results and earnings sharing amount;
  - c. The methodology and details of the proposed allocation of those account balances and earning sharing amounts to classes, and proposed methods of recovery of those amounts within those classes;
  - d. Union Gas’ Data Centre Consolidation; and
  - e. Generally to represent the interests of school boards and their students in this process.

**The Intervenor's Intended Participation**

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearing of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order.

### **Nature of Hearing Requested**

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

### **Counsel/Representative**

7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

- a. School Energy Coalition: (electronic copies only)

**ONTARIO EDUCATION SERVICES CORPORATION**  
**c/o Ontario Public School Boards Association**  
439 University Avenue, 18th Floor  
Toronto, ON  
M5G 1Y8

Attn: Wayne McNally, SEC Coordinator  
Phone: 416 340-2540  
Fax: 416 340-7571  
Email: [wmcnally@opsba.org](mailto:wmcnally@opsba.org)

- b. SEC's counsel: (both electronic and paper copies)

**SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION**  
2200 Yonge Street, Suite 1302  
Toronto, Ontario, M4S 2C6

Attn: Mark Rubenstein  
Phone: 647-483-0113  
Fax: 416-483-3305  
Email: [mark@shepherdrubenstein.com](mailto:mark@shepherdrubenstein.com)

with an electronic copies to:

Attn: Jay Shepherd  
Phone: 416-804-2767  
Email: [jay@shepherdrubenstein.com](mailto:jay@shepherdrubenstein.com)

and

Attn: Maureen Helt  
Phone: 647-483-0114  
Email: [maureen@shepherdrubenstein.com](mailto:maureen@shepherdrubenstein.com)

Respectfully submitted on behalf of the School Energy Coalition this May 18<sup>th</sup>, 2017.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition