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Toronto, Ontario M9B 6H7  
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October 19, 2017

**Via RESS and Courier**

Ms. Kirsten Walli  
Board Secretary  
**Ontario Energy Board**  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**RE: Union Gas Limited  
2018 Rates Application  
Ontario Energy Board File Number: EB-2017-0087**

**Letter of Intervention - Ontario Association of Physical Plant Administrators (OAPPA)**

Aegent Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators to assist the association on matters related to the above-noted application. Aegent is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as an intervenor in the EB-2017-0087 proceeding and provides the following information:

1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario, a number of whom are distribution customers of Union Gas. As a result, certain OAPPA member universities will be directly affected by the outcome of this proceeding. Therefore, Union's application for 2018 rates is of direct interest to OAPPA and at this time, OAPPA expects to be active in most aspects of the proceeding.
2. OAPPA participated in the process that resulted in the settlement agreement setting out Union's 2014-2018 Incentive Rate Mechanism that was approved by the Board in EB-2013-0202 and that forms the basis for the 2018 rates application.
3. OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.
4. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards is provided in the Attachment to this letter.

5. OAPPA requests that all correspondence and documents be directed to:

Valerie Young  
Director, Research and Analysis  
Aegent Energy Advisors Inc.  
10 Four Seasons Place  
Suite 210  
Toronto, Ontario  
M9B 6H7

Telephone: 416.622.9449, x104  
Fax: 416.622.9797  
E-mail: [vyoung@aegent.ca](mailto:vyoung@aegent.ca)

A copy of this letter is being delivered to Union Gas as indicated below.

Should you have any questions, please feel free to contact me.

Yours truly,

A handwritten signature in cursive script that reads "Valerie Young". The signature is written in black ink and is positioned below the "Yours truly," text.

Valerie Young  
Director, Research and Analysis

cc. Adam Stiers, Union Gas (e-mail)  
Crawford Smith, Torys (e-mail)  
Nathan Splinter, OAPPA / Queen's University (e-mail)

## ATTACHMENT

### ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

#### Information Required by Section 3.03.1 of the Practice Direction on Cost Awards

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College	Ryerson University
Brock University	University of Toronto
Carleton University	University of Toronto – Mississauga
University of Guelph	University of Toronto – Scarborough
Lakehead University	Trent University
Laurentian University	University of Ontario Institute of Technology
McMaster University	University of Waterloo
Nipissing University	Western University
Ontario College of Art and Design University	Wilfred Laurier University
University of Ottawa	University of Windsor
Queen's University	York University

OAPPA's Mission Statement: To assist higher education facilities officers and staff develop, maintain and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially-assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting such as that required under Ontario Regulation 397/11 (Energy Conservation and Demand Management Plans) and the Greenhouse Gas Emissions Reduction Program. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation in natural gas related proceedings focuses primarily on the rate proceedings of Enbridge Gas Distribution and Union Gas. The majority of OAPPA members are customers of either Enbridge or Union. From an operating perspective, the rate structures, rate levels, and terms and conditions of service of the utilities are of direct importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions in natural gas proceedings by its external advisor, Aegent Energy Advisors Inc. Aegent performs a number of functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the Board. The Chair of the OAPPA Energy Committee is Aegent's primary contact, and the current Chair of this Committee is Mr. Nathan Splinter, Energy Management, Physical Plant Services, Queen's University. Aegent's representative is Valerie Young, Director – Research and Analysis.