

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Distribution Inc. and Union Gas Limited, pursuant to section 36 of the *Ontario Energy Board Act, 1998*, for an order or orders approving a rate setting mechanism and associated parameters during the deferred rebasing period, effective January 1, 2019.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
1. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:
<http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document>
2. 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

3. SEC’s intended participation will focus on the following issues:
 - a. The proposed methodology used for setting rates for the period beginning January 1, 2019;
 - b. The proposed costs and offsets for the test years, the resulting revenue requirement, the forecast of revenues, and the resulting deficiency;
 - c. The proposed treatment by the Applicant of savings generated by the merger transaction;
 - d. All proposals for the merger of common or similar programs between the merging entities;
 - e. The proposed effective date for initial rates and each subsequent rate adjustment;
 - f. The proposed capital spending plans of the Applicant;
 - g. The cost allocation and rate design proposed for the collection of the revenue requirement and deficiency from customers;

- h. Harmonization of rates between rate zones, both initially and in the longer term, and the impacts, if any, on customers;
- i. Benchmarking and customer engagement results of the Applicant;
- j. Customer service, and other outcomes achieved and proposed by the Applicant;
- k. How the Applicant will fulfill of Board directions made to, and commitments made by, Enbridge and Union, since their last rebasing application;
- l. All requests for creation and/or clearance of deferral accounts, and all other components of the Application; and
- m. Generally to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

- 4. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. This may include the filing of evidence. 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

- 5. SEC believes that an oral hearing is appropriate in this proceeding. A letter outlining SEC's procedural suggestions herein is being filed concurrently with this Notice of Intervention.

Counsel/Representative

- 6. 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

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

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION

2200 Yonge Street, Suite 1302
Toronto, Ontario, M4S 2C6

Attn: Jay Shepherd
Phone: 416-804-2767
Fax: 416-483-3305

Email: jay@shepherd rubenstein.com

with an electronic copy to:

Attn: Mark Rubenstein

Phone: 647-483-0113

Email: mark@shepherd rubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this December 12, 2017.

Jay Shepherd
Counsel for the School Energy Coalition