

15 December 2017

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Attn: Ms Kirsten Walli
Board Secretary

By electronic filing and e-mail

Dear Ms Walli:

**Re: GEC Intervention - EB-2017-0224, EB-2017-0255, EB-2017-0275
Applications for Approval to Recover the Costs Associated with 2018 Cap and Trade
Compliance Plans - Enbridge Gas Distribution Inc., Union Gas Limited, EPCOR Natural
Gas Limited Partnership**

1. The Green Energy Coalition (GEC) hereby seeks intervenor status in this matter and requests that it be found eligible for costs.
2. The GEC is comprised of the Greenpeace Canada and Sierra Club of Canada. GEC's member groups are charitable or non-profit organizations active on environmental and energy policy matters.
3. GEC is an active participant in DSM regulatory matters before the Board and has worked with the companies in the development of their DSM proposals. GEC will be an active intervenor and expects to file expert evidence in this proceeding.
4. GEC requests that the Board hold an oral hearing in this matter. The applications propose investments in Renewable Natural Gas and Ground Source Heat Pumps which are not cost-effective without major government subsidy, while at the same time ignoring conservation opportunities that are cost effective. Further, the applicants appear to inexplicably place reliance on earlier conservation potential studies for the proposition that there are no further cost-effective DSM opportunities. GEC will bring evidence demonstrating that there is an abundance of added conservation savings potential which can be achieved with more aggressive, improved program design, especially in light of the carbon costs that can be avoided and the government support available to ensure that there is no undue cross-subsidy between customers.

5. We request that the following persons be included on the distribution list:

David Poch,
1649 Old Brooke Road,
Maberly, ON, K0H 2B0

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Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

Cc: Enbridge & Union & EPCOR