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December 20, 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 Application for Intervenor Status for 2018 Cap and Trade Compliance Plans, EB-2017-0255 (Union Gas Limited) / EB-2017-0224 (Enbridge Gas Distribution Inc.) / EB-2017-0275 (EPCOR Natural Gas Limited Partnership)

We are counsel for the Ontario Sustainable Energy Association (“OSEA”). OSEA requests intervenor status in the above noted proceedings. OSEA also seeks eligibility for a cost award.

OSEA’S EXPERIENCE AS AN INTERVENOR

OSEA actively participates in Board proceedings and has been granted intervenor status by the Board in previous hearings. OSEA was an active intervenor in the Board’s consultation to develop the natural gas regulatory framework to support the implementation of Ontario’s Cap and Trade program (EB-2015-0363). OSEA has an interest in Compliance Plans that are submitted pursuant to the natural gas regulatory framework, and intervened in the combined proceeding regarding Union Gas Limited, Enbridge Gas Distribution Inc., and Natural Resource Gas Ltd.’s 2017 Cap and Trade Compliance Plans (EB-2016-0296 / EB-2016-0300 / EB-2016-0330). OSEA contributes fully in these matters and believes it can continue to offer assistance and insight to the Board.

NATURE AND SCOPE OF OSEA’S INTENDED PARTICIPATION

OSEA intends to be an active participant in these proceedings, and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. OSEA intends to participate in requests for information, any requisite motions, test evidence, submit written interrogatories and provide argument in accordance with the Board’s procedures for these proceedings. OSEA request these proceedings proceed by way of oral hearing.

OSEA'S 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.
- ◆ OSEA is Ontario's lead advocate, facilitator and catalyst for sector transformation and the transition to a more sustainable energy economy.
- ◆ 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.
- ◆ 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. Sustainable energy includes:
 - conservation, energy efficiency and demand management
 - renewable heat and electricity generation, and other forms of sustainable technology
 - 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

OSEA has a substantial interest in the development of Union Gas Limited, Enbridge Gas Distribution Inc., and EPCOR Natural Gas Limited Partnership's 2018 Cap and Trade Compliance Plans. OSEA's interest in this proceeding will be in all aspects of the utilities' 2018 Cap and Trade Compliance Plans, including but not limited to the compliance options, the proposed abatement measures, long-term investments and new business activities aspects of the plans.

Ontario's Cap and Trade program is designed to promote the reduction of greenhouse gas emissions, one of OSEA's key objectives. OSEA actively participated and made submissions in the Board's consultation to develop the natural gas regulatory framework in support of Ontario's Cap and Trade program. As an advocate for sustainable energy solutions and for the reduction of greenhouse gas emissions, OSEA has an interest in the utilities' Compliance Plans submitted under the Board's regulatory framework.

OSEA has a particular interest in the utilities' proposals to reduce greenhouse gas emissions through customer abatement activities and outreach programs. Encouraging Ontarians to conserve energy and be knowledgeable about options for accessing renewable energy sources and reducing personal energy consumption is at the heart of OSEA's mandate. OSEA actively participated in the combined proceedings regarding Enbridge Gas Distribution Inc., Union Gas Limited and Natural Resource Gas Ltd.'s 2017 Cap and Trade Compliance Plans.

COSTS

OSEA seeks approval of costs in these proceedings. 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, including the emissions of greenhouse gases.

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.



OSEA's counsel and consultant in this matter are:

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Yours truly,

Joanna Vince

cc: Janis Wilkinson, OSEA
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