

Environment Indigenous Energy Law

Direct Dial: File:

416.862.4825 7268

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December 22, 2017

Ontario Energy Board 2300 Yonge Street Suite 2700 Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Intervenor Status and Cost Eligibility Request for Low-Income Energy Network Board File No. EB-2017-0224

Enbridge Gas Distribution Inc., Union Gas Limited and Epcor Natural Gas Limited

- 2018 Cap and Trade Compliance Plans Cost Recovery

We are counsel for the Low-Income Energy Network ("LIEN"). LIEN requests intervenor status in the above-mentioned proceeding and seeks eligibility for a cost award.

LOW-INCOME ENERGY NETWORK

LIEN represents 60 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers and providing low-income consumers with the opportunity to better manage their energy bills. In so doing, LIEN addresses customer care matters, commodity prices and rates, and DSM/CDM matters. LIEN helps to ensure that low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

NATURE AND SCOPE OF INTERVENTION

LIEN intends to intervene in this proceeding for the following reasons:

• LIEN intervened in the Board's development of the Board's Cap and Trade Natural Gas Framework (the "Framework") and the 2017 Compliance Plan proceeding under the *Climate Change Mitigation and Low-carbon Economy Act, S.O. 2016, c.7.* Enbridge Gas Distribution Inc., Union Gas Limited and Epcor Natural Gas Limited (the "Utilities") have applied for Board approval to recover the costs of the 2018 Compliance Plans, each of which includes



proposed measures that will impact the rates low-income natural gas consumers pay for natural gas.

• LIEN intends to intervene in this proceeding to assist the Board to ensure that the interests of low-income natural gas consumers are represented in this proceeding.

LIEN intends to participate in all aspects of the proceeding, including interrogatories, technical conferences, settlement conferences, hearings (whether oral or written) and any other procedural steps. LIEN does not yet have a preference as to whether a hearing should proceed orally or in writing.

COSTS

LIEN requests that the Board find it eligible for costs under section 3.03 (a) of the Board's Practice Direction on Cost Awards. LIEN "primarily represents the direct interests of residential consumers in relation to regulated services." LIEN has been accepted as a party eligible for an award of costs in many other proceedings before the Board.

As a not-for-profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other stakeholders to avoid duplication where possible.

We request that counsel (Mr. Matt Gardner and Ms. Nicole Petersen), as well as Ms. Theresa McClenaghan (theresa@cela.ca) of CELA (member of LIEN's legal subcommittee) be listed on the intervenors' list under LIEN, since this makes the later distribution of updates more effective.

Mr. Gardner and Ms. Petersen are located at:

Willms & Shier Environmental Lawyers LLP 4 King Street West Suite 900 Toronto, ON M5H 1B6

Matt Gardner: (416) 862-4825

Email: mgardner@willmsshier.com



Nicole Petersen: (416) 642-4872

Most F. Gil

Email: npetersen@willmsshier.com

Yours truly,

Matt Gardner
Document #: 1299202