

Environment Indigenous Energy Law

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February 22, 2018

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 ("OSEA") Application for

**Intervenor Status** 

Board File No. EB 2017-0323/EB-2017-0324

Willms & Shier Environmental Lawyers LLP is counsel for OSEA. OSEA requests intervenor status in Enbridge Gas Distribution Inc. and Union Gas Limited's disposition of the 2015 Demand Side Management ("DSM") Deferral and Variance Accounts. OSEA also seeks eligibility for a cost award.

## OSEA AND ITS INTEREST IN THE PROCEEDING

OSEA is a public interest organization that works towards a sustainable energy future. This includes ensuring funding and rates that encourage conservation and the incorporation of renewable energy. OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, cooperatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. Its membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA is Ontario's lead advocate and facilitator for sector transformation to a more sustainable energy economy.

OSEA has a substantial interest in the DSM program and has been an active participant in all DSM related hearings. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2014 DSM deferral and variance accounts (EB-2015-0267 and EB-2015-0276) as well as the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049) and DSM



Mid-Term Review (EB-2017-0127 and EB-2017-0128). OSEA contributed fully in these matters and believes it can continue to offer assistance and insight to the Board in such matters.

OSEA has an interest in this proceeding about how the new evaluation, measurement and verification process will be used for clearance of the 2015 deferral and variance accounts and the applicants' concerns and proposed changes to the EM&V process.

## NATURE AND SCOPE OF OSEA'S INTENDED PARTICIPATION

OSEA intends to be an active participant in this proceeding. OSEA will submit interrogatories, attend technical and settlement conferences, provide oral and written submissions, and attend hearings in accordance with the Board's procedures stipulated for this proceeding. OSEA will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed.

## **COSTS**

OSEA seeks approval of costs in this proceeding. 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.

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.



## **REPRESENTATIVES**

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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