

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Enbridge Gas
Distribution Inc. for an order or orders related to its
Renewable Natural Gas Enabling Program and
Geothermal Energy Service Program;

AND IN THE MATTER OF an application by Enbridge Gas
Distribution Inc. for an order or orders amending or varying
the rates charged to customers for the sale, distribution,
transmission, and storage of gas commencing as of
January 1, 2018.

EB-2017-0319

NOTICE OF INTERVENTION

ANWAATIN INC.

March 5, 2018

A. Application for Intervenor Status

1. Anwaatin Inc. (**Anwaatin**) hereby requests intervenor status in the matter of Enbridge Gas Distribution Inc.'s (**Enbridge's**) application for approval of service fees for its new renewable natural gas (**RNG**) enabling and geothermal energy service programs. This notice of intervention is filed pursuant to Rule 22 of the Board's Rules of Practice and Procedure.

B. Anwaatin and its Interest in the Proceeding

2. Anwaatin is an Indigenous business corporation that works with Indigenous communities in linked energy markets that include Ontario, Quebec, California and Manitoba. Anwaatin's mission is to ensure that Indigenous communities are front and centre in fighting climate change and leading emerging markets associated with climate change action. Its business focusses on (i) territorial climate change, (ii) readiness for emerging cap-and-trade markets, (iii) strengthening biodiversity and resilience in the face of climate change, and (iv) creating partnerships to sell Indigenous carbon offsets.
3. The member First Nations communities and organizations participating in Anwaatin in connection with this proceeding will be confirmed in short order.
4. Enbridge has requested approval for the methodology to set site-specific monthly service fees for its new RNG Enabling Program and a specific \$25.20 per tonne per month service fee for 2018 for its new Geothermal Energy Service Program. Enbridge states that customers of the programs will pay for the full costs of the programs and existing natural gas customers will not be harmed and will benefit over the life cycle of the programs. For the RNG Enabling Program, Enbridge is proposing to provide upgrading services and injection services to RNG producers. The optional upgrading service will upgrade biogas to pipeline quality. The mandatory injection services will include Enbridge Gas building natural gas pipelines to connect RNG producers to a natural gas distribution system. Enbridge is also proposing to own and maintain ground source geothermal loops while customers will own a heat pump system that is similar to a furnace-air conditioner combination.
5. Anwaatin hopes to provide the Board with the perspective of the disproportionate number of First Nations currently living in energy poverty in Ontario. It also hopes to provide an understanding of the differential impact of rates on remote and near-remote communities. To assist the Board in responding to these issues, Anwaatin intends to address the

possibility of rate relief in the context of this proceeding, the use of pay-as-you-save programs in other jurisdictions, and First Nations access to biomass for RNG.

C. Nature and Scope of Anwaatin's Intended Participation

6. Anwaatin intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. Anwaatin intends to participate actively to request information, participate in any requisite motions, test evidence through the stipulated processes, submit written interrogatories and provide argument. Anwaatin may also submit evidence, subject to the development of the record in this matter.

D. Costs

7. Anwaatin is, in accordance with s. 3.03(b) of the Board's Practice Direction on Cost Awards, eligible to seek an award of costs as Anwaatin is a party that primarily represents an interest or policy perspective relevant to the Board's mandate and to the proceeding.
8. Anwaatin represents the interests of First Nations energy consumers in Ontario and is committed to ensuring that they served through access to affordable, reliable, sustainable and modern energy. Anwaatin should be awarded costs in this proceeding because its comments will serve an interest and policy perspective relevant to the Board's mandate.
9. Anwaatin submits that it is appropriate for the Board to award Anwaatin costs in the context of this proceeding, and hereby requests cost eligibility.

E. Anwaatin's Representatives

10. Anwaatin requests that further communications with respect to this proceeding be sent to the following:

Anwaatin Inc.

c/o Mississaugas of the New Credit First Nation
3034 Mississauga Road, RR#6
Hagersville, Ontario N0A 1H0

Attention: Larry Sault, CEO
Telephone: 416-675-3226 x 311
Facsimile: 226-314-2100
Email: larry@anwaatin.com

AND TO ITS CONSULTANT

Shared Value Solutions Ltd.

Attention: Don Richardson, Managing Partner
Telephone: 226-706-8888 x 101
Facsimile: 226-314-1200
Email: don.richardson@sharedvaluesolutions.com

AND TO ITS COUNSEL

DeMarco Allan LLP

5 Hazelton Avenue
Suite 200
Toronto, ON M5R 2E1

Attention: Lisa (Elisabeth) DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@demarcoallan.com

Attention: Cary Ferguson
Tel: 1-888-389-5798
Facsimile: 1-888-734-9459
Email: cary@demarcoallan.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
5th day of March, 2018



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Anwaatin