



VIA COURIER, EMAIL AND RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

September 28, 2018

Dear Ms. Walli:

**RE: Lakefront Utilities Inc. 2019 Electricity Rates Application
Notice of Intervention of ECNG Energy L.P. ("ECNG")
Board File No.: EB-2018-0049**

We are an electricity retailer licensed by the OEB.

Please find enclosed our Notice of Application in the above noted proceeding. We have also provided a copy of the same to the Applicant.

Should you have any questions or require anything further, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melissa Loucks", is written over a horizontal line.

Melissa Loucks, B.I.B, J.D., LL.M.
Legal Counsel

cc: A. Giddings, Lakefront Utilities Inc. (via email)

**ONTARIO ENERGY BOARD IN THE MATTER OF AN
APPLICATION BY LAKEFONT UTILITIES INC. 2019
APPLICATION FOR ELECTRICITY RATES**

NOTICE OF INTERVENTION BY ECNG ENERGY L.P.

1. ECNG Energy L.P. ("ECNG") is requesting to participate in this proceeding as an intervenor.
2. ECNG is an electricity retailer licensed by the OEB. Our services included assisting and advising clients on the installation of combined heat and power generators.
3. The Lakefront Utilities Inc. ("Lakefront") 2019 rate application includes a proposed standby charge. The proposed standby rate would be charged to customers who have installed combined heat and power generation and who require reserve capacity for situations where the generator is offline and the customer requires electricity from the distribution grid.
4. ECNG is intervening because proposed standby charges for electricity utility consumers who install load displacement generation or behind-the-meter generation directly impact our clients' cost benefit analysis. ECNG's interest is in ensuring the reasonableness of any determination with respect to a proposed standby charge.
5. While the time limit directed by the Board for intervening has passed, ECNG is requesting intervenor status at this point as ECNG only became aware of this matter before the Board September 27th. ECNG is aware that the Board has extended the deadline for two Lakefront General Service customers installing cogens to apply for intervenor status. ECNG respectfully requests that the Board allow ECNG's application as it relates to the same portion of Lakefront's rate application.
6. ECNG requests intervenor status and reserves its rights to file evidence, arguments or interrogatories, cross-examine witnesses and make submissions.
7. ECNG requests this proceeding to be in English and that all communications in respect of this proceeding be copied to:

Ms. Melissa Loucks; email: mloucks@ecng.com; Tel: 905-635-3300

Mr. Angelo Fantuz; email: afantuz@ecng.com; Tel: 905-635-3294

ECNG Energy L.P.
5575 North Service Road
Suite 400
Burlington, ON L7L 6M1
Tel: 905-635-3300
Fax: 905-635-3298

8. ECNG will not be seeking an award of costs in this matter.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated: September 28, 2018

ECNG Energy L.P.
5575 North Service Road
Suite 400
Burlington, ON L7L 6M1
Tel: 905-635-3300
Fax: 905-635-3298

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Melissa A. Loucks

TO: **ONTARIO ENERGY BOARD**
Board Secretary
2300 Yonge Street
27th Floor, P.O. Box 2319
Toronto, ON M4P 1E4
Email:
boardsec@ontarioenergyboard.ca

AND TO: **LAKEFRONT UTILITIES INC.**
Adam Giddings, Manager of Regulatory
Compliance and Finance
207 Division Street
P.O. Box 577
Coburg, ON K9A 4L3
Tel: 905-372-2193 ext. 5242
Fax: 905-372-2581
Email: agiddings@lusi.on.ca

(Applicant)