

December 10, 2018

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: EB-2018-0331– Applications by Union Gas Limited, Enbridge Gas Distribution Inc. and EPCOR Natural Gas Limited Partnership for Disposition of their Cap and Trade Related Deferral and Variance Account Balances

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Applications to the Ontario Energy Board (“OEB”) by Union Gas Limited (“Union”), Enbridge Gas Distribution Inc. (“Enbridge”) and EPCOR Natural Gas Limited Partnership (“EPCOR”) for disposition of their Cap and Trade related deferral and variance account balances. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board’s order in this proceeding will ultimately impact the rates that residential consumers pay for the delivery of natural gas.

On December 10, 2018, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test the Applicants’ evidence;
2. To assess the prudence of balances in the accounts;
3. To participate in the various stages of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many of the applications of the natural gas utilities over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all Board Notices, Procedural Orders and hard copies of the Applicant’s evidence should be sent to me, at 62 Hillside Avenue East, Toronto, Ontario, M4S 1T5. My telephone number is 416-322-7936 and my e-mail is jgirvan@uniserve.com.

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: Enbridge, Regulatory Affairs
Union Gas, Regulatory Affairs
EPCOR, Brian Lippold