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December 21, 2018

Ontario Energy Board
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-2018-0331**

Willms & Shier Environmental Lawyers LLP is counsel for OSEA. OSEA requests intervenor status in the Board's combined proceeding to consider applications for Enbridge Gas Distribution Inc., Union Gas Limited and EPCOR Natural Gas Limited Partnership's (collectively the Utilities) disposition of Cap and Trade related deferral and variance accounts for the period of 2016-2018. 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, co-operatives, 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 actively participates in Board proceedings and was granted intervenor status by the Board in previous hearings. OSEA was granted intervenor status in the Board's consultation to develop a regulatory framework for natural gas distributors for Ontario's Cap and Trade program (EB-

2015-0363). OSEA also participated in the Board's combined proceeding regarding the Utilities' 2016 Cap and Trade Compliance Plans (EB-2016-0296, EB-2016-0300, and EB-2016-0330) and 2017 Cap and Trade Compliance Plans (EB-2017-0224, EB-2017-0225, EB-2017-0275). 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 application and the discontinuance of the Utilities' Cap and Trade programs. OSEA has been involved in several Cap and Trade efforts, and intends to offer important comments on this aspect of the program's discontinuance and disposition of the amounts in the Cap and Trade variance and deferral accounts.

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,



Robert Woon

cc: Dan Goldberger, OSEA
Marion Fraser, Fraser & Company

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