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February 28, 2019

Ms Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms. Walli,

# RE: EB-2018-0205 Enbridge Gas 2019 Federal Carbon Pricing Application Energy Probe Intervenor Request Letter

Energy Probe Research Foundation (Energy Probe) applies for intervenor status in the EB-2018-0205 proceeding, the application Enbridge Gas to raise its natural gas rates effective April 1, 2019 to recover costs associated with the Federal Greenhouse Gas Pollution Pricing Act.

## **Statement of Interest**

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its natural gas residential customer supporters in Ontario, which we have some number of thousands, and will also be representing a broader concern with respect to the overall financial health and operational integrity of Ontario utilities.

Energy Probe supports the Ontario government in its opposition to the Federal Carbon Tax and will focus on the following parts of the application:

- the incremental administration and program costs and any resulting increase to financing costs resulting from the imposition of the Federal Carbon Tax;
- the proposal to charge customers a Federal Carbon Charge on a volumetric basis; and
- the application for approval for the Enbridge Gas Distribution and Union Gas rate zones of the following deferral accounts: Greenhouse Gas Emissions Administration Deferral

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Page 2 Account, the Federal Carbon Charge – Customer Variance Account, and the Federal Carbon Charge – Facility Variance Account.

#### Hearing

Energy Probe hopes that all issues in this application can be settled through negotiation and that a hearing would not be necessary. However, if a hearing is required, Energy Probe plans to be an active participant in the hearing, whether it is in oral or written form.

### Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

### Communications

Communications relating to this Intervenor Request Letter, including but not limited to all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultant:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com

Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi Consultant to Energy Probe

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