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November 7, 2019

Via RESS and Courier

Ms. Christine Long
Board Secretary and Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Long:

RE: Enbridge Gas Inc. 2020 Rates Application
Ontario Energy Board File Number: EB-2019-0194

Intervention Request - Ontario Association of Physical Plant Administrators

Jupiter Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators (OAPPA) to assist the association on matters related to the above-noted application. Jupiter is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as an intervenor in the EB-2019-0194 proceeding and provides the following information:

1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario, most of whom are distribution customers of Enbridge Gas Inc. As a result, OAPPA member universities have a direct interest in this proceeding. At this time, OAPPA anticipates being active in most aspects of the proceeding.
2. OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.
3. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards is provided in the attachment to this letter.

4. OAPPA requests that all correspondence and documents be directed to:

Valerie Young
Director, Regulatory Affairs and Government Relations
Jupiter Energy Advisors Inc.
10 Four Seasons Place, Suite 802
Toronto, Ontario
M9B 6H7

Telephone: 416.622.9449, ext. 104
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E-mail: valerie.young@askjupiter.ca

Should you have questions or require further information, please contact me at the above number.

Yours truly,

[Original signed by]

Valerie Young

cc. M. Kitchen, EGI (e-mail)
R. Torul, EGI (e-mail)
D. Stevens, Aird & Berlis (e-mail)
N. Splinter, OAPPA / Queen's University (e-mail)

ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS
Information Required by Section 3.03.1 of the Practice Direction on Cost Awards

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College
Brock University
Carleton University
University of Guelph
Lakehead University
Laurentian University
McMaster University
Nipissing University
Ontario College of Art and Design University
University of Ottawa
Queen's University

Ryerson University
University of Toronto
University of Toronto – Mississauga
University of Toronto – Scarborough
Trent University
University of Ontario Institute of Technology
University of Waterloo
Western University
Wilfred Laurier University
University of Windsor
York University

OAPPA's Mission Statement: To assist higher education facilities, officers and staff develop, maintain and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially-assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation in natural gas related proceedings has focused primarily on the rate proceedings of Enbridge Gas Inc. The majority of OAPPA members are customers of Enbridge Gas with some members in the EGD zone and others in the Union zones. From an operating perspective, the rate structures, rate levels, and terms and conditions of service are of direct importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions in natural gas proceedings by its external advisor, Jupiter Energy Advisors Inc. Jupiter performs a number of functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the Board. The Chair of the OAPPA Energy Committee is Jupiter's primary contact, and the current Chair of this Committee is Mr. Nathan Splinter, Manager – Energy and Sustainability, Queen's University. Jupiter's representative is Valerie Young, Director – Regulatory Affairs and Government Relations.