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File: 4834

By Same-Day Courier

September 15, 2006

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

Attention: Kristen Walli, Board Secretary

Dear Ms. Walli:

**Re: Intervention Request on behalf of the Low-Income Energy Network
Board File No. EB-2006-0034
Enbridge Gas Distribution Inc. Rates for 2007**

Willms & Shier Environmental Lawyers LLP (W+SEL) is environmental legal counsel to the Low-Income Energy Network (LIEN).

REQUEST FOR INTERVENTION

In accordance with section 23 of the Ontario Energy Board *Rules of Practice and Procedure*, we hereby request Intervenor status on behalf of LIEN in the above-noted Enbridge Rates application.

INTEREST IN PROCEEDING AND GROUNDS FOR INTERVENTION

LIEN is an organization of more than 50 member associations from across Ontario, including, energy, public health, legal, tenant/housing, education and social and community organizations. LIEN is directed by a Steering Committee. In addition to the Steering Committee and Members and Supporting Organizations, over 25 individuals have also indicated their support for LIEN.

As an umbrella organization, LIEN offers the opportunity for one entity to represent the similar interests of many organizations that have come together under LIEN. A description of its organization in greater detail can be found on its website (www.lowincomeenergy.ca). LIEN is a well recognized Intervenor in other Board proceedings, especially those concerning the issue of Rates.

LIEN's "mission statement" is in itself a statement of LIEN's interest in this proceeding.



“The Low-Income Energy Network:

- ♦ *aims to ensure universal access to adequate, affordable energy as a basic necessity, while minimizing the impacts on health and on the local and global environment of meeting the essential energy conservation needs of all Ontarians, and*
- ♦ *promotes programs and policies which tackle the problems of energy poverty and homelessness, reduce Ontarians’ contribution to smog and climate change, and promote a healthy economy through the more efficient use of energy, a transition to renewable sources of energy, education and consumer protection.”*

LIEN intends to participate actively and responsibly throughout the proceeding by submitting evidence, argument and/or interrogatories, and/or by cross-examination of witnesses.

NATURE AND SCOPE OF INTERVENTION

LOW-INCOME RATE ASSISTANCE

LIEN intends to seek the development of a bill assistance strategy for low-income consumers that includes the establishment of a low-income assistance rate.

FAIR AND EQUITABLE RATES

LIEN supports fair and equitable rates for low-income consumers that provide appropriate price signals for conservation and takes into account their ability to pay. LIEN’s focus is on bill reductions and takes a holistic approach to rate setting that reflects that overall goal.

FUEL SWITCHING

LIEN supports using the right form of energy in the right application at the greatest level of energy efficiency. Special assistance will be needed for low-income consumers to facilitate this switch due to their lack of capital.

CONSERVATION AND DEMAND MANAGEMENT

LIEN strongly supports the promotion of energy efficiency and conservation through the development of conservation and demand management programs for low-income consumers that produce cost-effective results that stabilize and, to the extent possible, reduce the energy bills of low-income consumers in social-housing, private multi-residential and private single family residences.



REQUEST FOR ORAL HEARING

Given the complexity of the subject matter and that certain relevant evidence can best be adduced through cross-examination of witnesses, LIEN requests that this matter be dealt with by way of oral hearing by the Board.

COSTS

LIEN has been accepted as a party eligible for an award of costs under section 3.03 of the Board's Practice Direction on Cost Awards in other proceedings before the Board. LIEN respectfully requests an early determination by the Board that it is eligible for an award of costs in this proceeding.

CONTACT INFORMATION

LIEN requests that copies of written materials in electronic or other format concerning this proceeding, be sent to:

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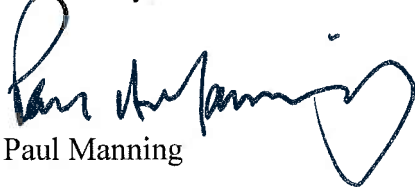
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Yours truly,



Paul Manning

cc: Enbridge Gas Distribution Inc.
LIEN