

Sent by Email

December 20, 2019

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Request for Intervenor Status and Eligibility for an Award of Costs
Board File Number: EB-2019-0255
Potential Projects to Expand Access to Natural Gas Distribution

Willms & Shier Environmental Lawyers LLP (“Willms & Shier”) is legal counsel to Northwatch. Northwatch intends to participate in the Board’s consultation on Potential Projects to Expand Access to Natural Gas Distribution and seeks cost award eligibility for this proceeding.

ABOUT NORTHWATCH

Northwatch is a public interest organization concerned with environmental protection and social development in northeastern Ontario. Founded in 1988 to provide a representative regional voice in environmental decision-making and to address regional concerns with respect to energy, waste, mining and forestry related activities and initiatives, Northwatch has a long-term and consistent interest in natural gas planning in Ontario. In particular, Northwatch’s interests are with respect to natural gas expansion projects in northeastern Ontario, conservation and efficiency measures, and rates and rate structures. Northwatch is a coalition of community and district based environmental, social justice and social development organizations.

HOW NORTHWATCH IS AFFECTED BY THE CONSULTATION ON POTENTIAL PROJECTS TO EXPAND ACCESS TO NATURAL GAS DISTRIBUTION

The residents and regions of northeastern Ontario will or may be affected by the Board’s consultation on Potential Projects to Expand Access to Natural Gas Distribution in so far as it relates to:

- ♦ how natural gas expansion in Northern Ontario may evolve in support of and/or counter to Northwatch’s interests and objectives, and

- ♦ how the increased access to natural gas distribution and construction of new natural gas projects will impact communities and the environment in Northern Ontario.

NATURE AND SCOPE OF NORTHWATCH'S INTENDED PARTICIPATION

The nature and scope of Northwatch's participation will be that of an intervenor and will participate as directed by the Board, including preparing and filing written comments.

NORTHWATCH'S MEMBERSHIP AND INVOLVEMENT IN BOARD PROCEEDINGS

Northwatch was founded in 1988 as a regional coalition of individuals and organizations concerned with the protection of the environment and with social equity. Northwatch has a diverse membership which includes local and district-based environmental groups, cottagers associations, naturalist clubs, church-based Indigenous support groups, women's organizations, and local peace groups.

Individual members include those who self-identify as professionals, trappers, tourist outfitters, paddlers, parents, educators, conservationists, hunters and fishers, and environmentalists. The common thread throughout Northwatch's membership is a deep commitment to the region of northeastern Ontario and to the health, well-being and sustainability of the human and natural communities throughout the region.

Northwatch's membership base and area of interest is the land mass north of the French River, comprised of the districts of Nipissing, Sudbury, Algoma, Manitoulin, Cochrane and Timiskaming, and including the land area north of the road system, generally known as the Hudson's Bay lowlands.

Northwatch is well respected for its policy and research work, public education programs, and its holistic approach to environmental and social planning and decision-making. Through a membership that is geographically dispersed throughout the region and through more than twenty years of work that is regionally based, Northwatch has an extensive knowledge of northeastern Ontario and the diverse and interconnecting issues of energy, natural resource and environmental management.

Northwatch has a history of involvement in energy policy. Previously, Northwatch actively participated as an intervenor and has been found eligible for an award of costs in the following Board proceedings:

- ♦ The Integrated Power System Plan ("IPSP")
- ♦ The Transmission Connection Cost Responsibility Review (EB-2008-0003)
- ♦ Proposed Amendments to the Distribution System Code (EB-2009-0077)

- ♦ The Regulatory Treatment of Infrastructure Investment for Ontario's Electricity Transmitters & Distribution (EB-2009-0152)
- ♦ The Renewed Regulatory Framework for Electricity and subsequent proceedings relating to regional planning and amendments to the Transmission System Code and Distribution System Code (EB-2011-0043)
- ♦ East-West Tie Line proceeding (EB-2011-0140)
- ♦ The Proposal to Amend the Licence of the Ontario Power Authority (EB-2013-0192)
- ♦ The Regional Planning and Cost Allocation Review (EB-2016-0003).

GROUNDWORK FOR NORTHWATCH ELIGIBILITY FOR COSTS

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, Northwatch believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board,
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding, and
- c) is a person with an interest in land that is affected by the process.

Northwatch meets all three of the eligibility criteria, but as a policy-focused public interest organization, its primary purpose is with respect to (b).

Northwatch's primary purpose is to represent the public interest with respect to environmental protection and resource management matters in northeastern Ontario. Northwatch is a strong supporter of natural gas planning, and as such, welcomes this initiative and related initiatives. However, as a coalition of interests which includes those represented by social organizations, Northwatch also has an interest and a relevant perspective with respect to consumer concerns, many of which are unique in northeastern Ontario, relative to a provincial or more urban context (i.e. criterion a). Northwatch represents consumers who will be impacted by the expanded access to natural gas in northeastern Ontario.

Northwatch represents the interests of the environment and of the residents of northeastern Ontario who identify and express environmental concerns; it is within the mandate of the Ontario Energy Board to consider such matters as the effect on the environment (i.e. criteria b). Further, our members have an interest in the land that is or may be affected by the process (i.e. criterion c). That interest may in some cases be a private interest, but in every case is also a public interest and a matter of policy.

Northwatch will make a responsible, unique and beneficial contribution to the Board's consultation on Potential Projects to Expand Access to Natural Gas Distribution.

As a not-for-profit organization, Northwatch's participation in this proceeding is dependent on any cost awards it receives.

COLLABORATION WITH OTHER INTERVENORS

Northwatch intends to collaborate and coordinate submissions with other intervenors where possible in order to avoid duplication.

REPRESENTATIVES

Northwatch's contact is Ms. Brennain Lloyd, consultant for Northwatch. Ms. Lloyd's contact information is as follows:

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Yours truly,

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