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January 27, 2020

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Board File No. EB-2019-0271
Enbridge Gas Inc.'s 2021 Demand Side Management Plan**

Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network ("LIEN"). LIEN seeks eligibility to intervene in the Board's proceeding relating to Enbridge Gas Inc.'s application for its 2021 Demand Side Management ("DSM") Plan dated November 27, 2019. LIEN also seeks eligibility for a cost award.

LOW-INCOME ENERGY NETWORK

LIEN represents 70 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers and providing low-income consumers the opportunity to better manage their energy bills. In so doing LIEN addresses customer care matters, commodity prices and rates, and DSM/CDM matters. LIEN helps to ensure that low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

NATURE AND SCOPE OF INTERVENTION

LIEN was engaged in consultations with both Union Gas and Enbridge Gas Distribution in the development of their 2015-2020 DSM Plans. LIEN also intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049), mid-term review of the 2015-2020 DSM plans (EB-2017-0127 and EB-2017-0128) and post-2020 DSM Framework for natural gas distributors (EB-2019-0003).

LIEN intends to intervene in this proceeding for the following reasons:

- ♦ This proceeding is a continuation of the work that LIEN has been doing with Union Gas and Enbridge Gas Distribution in developing the low-income gas DSM programs for the 2015-2020 period.
- ♦ This proceeding is critical to low-income consumers as it will result in the direction and programming for low-income natural gas consumers in 2021.

LIEN intends to participate in all aspects of this proceeding, including an oral hearing, if required.

COSTS

LIEN requests that the Board find it eligible for costs under section 3.03 (a) of the Board's Practice Direction on Cost Awards. LIEN "primarily represents the direct interests of residential consumers in relation to regulated services". LIEN has been accepted as a party eligible for an award of costs in many other proceedings before the Board.

As a not-for-profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other stakeholders to avoid duplication where possible. LIEN has retained Judy Simon to provide consulting advice to LIEN in this proceeding. Judy Simon is an expert on energy policy and conservation in Ontario and has been retained for expert advice in many proceedings by LIEN, and other clients, related to these issues.

We request that counsel (Mr. Matt Gardner and Ms. Madiha Vallani) and Ms. Judy Simon, consultant to LIEN, be listed as participants under LIEN, since this makes the later distribution of updates more effective.

Ms. Simon is located at:

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Yours truly,

Matt Gardner

cc: LIEN Legal Subcommittee
Judy Simon

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