

Sent by RESS Filing

June 8, 2020

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Attention: Christine E. Long, Registrar and Board Secretary

Dear Ms. Long:

**Re: LIEN**  
**Board File No. EB-2020-0152**  
**Consultation on Implementing Process for Opt Out of Time-of-Use Pricing**

---

Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network (“LIEN”). LIEN seeks eligibility to intervene in the Board’s Consultation on Implementing a Process for Customers to Opt Out of Time-of-Use (TOU) Pricing. 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**

Low-income electricity customers in Ontario will be included in those who may decide to opt out of TOU pricing starting November 1, 2020. In particular, LIEN is concerned about how low-income electricity customers in Ontario will become informed about opting out of TOU pricing and the information needed for low-income electricity customers to make informed decisions about whether to opt out of TOU pricing or not and which price structure is most appropriate.

LIEN’s consultant Judy Simon is interested in being part of the TOU Customer Choice Working Group.

## 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:

Judy Simon  
RPO Queens Quay  
PO Box 40008  
Toronto, ON M5V 0A4  
Email: [judysimon@jsimon.net](mailto:judysimon@jsimon.net)

Mr. Gardner and Ms. Vallani are located at:

Willms & Shier Environmental Lawyers LLP  
1 Toronto Street  
Suite 900  
Toronto, ON M5C 2V6  
Matt Gardner:  
(416) 862-4825  
Email: [mgardner@willmsshier.com](mailto:mgardner@willmsshier.com)  
Madiha Vallani:  
(416) 862-4835  
Email: [mvallani@willmsshier.com](mailto:mvallani@willmsshier.com)

Yours truly,



Matt Gardner

cc: LIEN Legal Subcommittee  
Judy Simon

Document #: 1761857