

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular s.90 (1) and s.97 thereof;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order granting leave to construct natural gas pipelines and ancillary facilities in the City of Toronto.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

1. The School Energy Coalition ("SEC") applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board's website, here:
<http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document>
3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

Issues to be Addressed

4. SEC's intended participation will include the following, with a particular focus on geo-targeted DSM:
 - a. The need for the proposed facilities, if any;
 - b. The timing, impacts, costs and benefits of the proposed facilities;
 - c. The extent, if any, that the Applicant can avoid or defer the facilities through targeted conservation activities, consistent with past guidance from the Board;
 - d. The cost responsibility for the proposed facilities, including but not limited to the potential responsibility of Waterfront Toronto and/or the City of Toronto, and the impact, if any, of the purported termination of the Keating bridge licence; and
 - e. Generally, to represent the interests of school boards and their students in this process.

The Intervenor's Intended Participation

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearings of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order. While SEC does not currently intend to

file evidence in this proceeding, it reserves its right to do so depending on the responses to interrogatories and any other discovery processes ordered by the Board.

Nature of Hearing Requested

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

Counsel/Representative

7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

- a. School Energy Coalition: (electronic copies only)

ONTARIO EDUCATION SERVICES CORPORATION
c/o Ontario Public School Boards Association
439 University Avenue, 18th Floor
Toronto, ON
M5G 1Y8

Attn: Wayne McNally, SEC Coordinator
Phone: 416-340-2540
Fax: 416-340-7571
Email: wayne.mcnally@oesc.cseo.org

- b. SEC's counsel: (both electronic and paper copies)

SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION
2200 Yonge Street, Suite 1302
Toronto, Ontario, M4S 2C6

Attn: Jay Shepherd
Phone: 416-804-2767
Fax: 416-438-3305
Email: jay@shepherd rubenstein.com

With an electronic copy to:

Attn: Mark Rubenstein
Phone: 647-483-0113
Email: mark@shepherd rubenstein.com

Respectfully submitted on behalf of the School Energy Coalition this December 2, 2020.

Jay Shepherd
Counsel for the School Energy Coalition