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June 10, 2021

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

Attention: Christine E. Long, Registrar and OEB Secretary

Dear Ms. Long:

**Re: Low Income Energy Network (LIEN)  
Intervention and Cost Eligibility Request  
Enbridge Gas Inc.'s ("EGI") Application for Multi-Year Natural Gas  
DSM Plan (2022-2027)  
OEB File No. EB-2021-0002 – Enbridge Gas Inc.**

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Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network ("LIEN"). LIEN requests eligibility to intervene in EGI's application for Multi-Year Natural Gas DSM Plan 2022-2027. LIEN also seeks eligibility for a cost award.

## **LOW-INCOME ENERGY NETWORK**

LIEN represents approximately 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 intends to intervene in this proceeding because this proceeding is critical to low-income consumers as it will result in the direction and programming for low-income natural gas consumers in 2022-2027.

LIEN participated in the OEB's previous hearings relating to the development of DSM plans. 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), and EGI's application for its 2021 DSM Plan (EB-2019-0271).

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

### **COSTS**

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

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 & Associates Inc. 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. Alexandra Heeney is a PhD engineering candidate at Stanford and will assist Ms. Simon and LIEN with research tasks.

We request that counsel (Mr. Matt Gardner and Ms. Madiha Vallani) and Ms. Judy Simon be included on the email distribution list for this proceeding.

Contact information for Ms. Simon:

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Yours truly,

Matt Gardner  
Partner  
*Certified as a Specialist in Environmental Law  
by the Law Society of Ontario*

cc: LIEN Legal Subcommittee  
Judy Simon

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