



June 10, 2021

VIA RESS

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long,

**Re: Enbridge Gas Inc. (EGI)
Demand Side Management Plan for 2022-2027 Application
OEB File No. EB-2021-0002**

We are counsel to the Association of Power Producers of Ontario (**APPrO**). Please find enclosed APPrO's Notice of Intervention requesting intervenor status and cost eligibility in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, appearing to be "Lisa (Elisabeth) DeMarco", with a long, sweeping horizontal line extending to the right.

Lisa (Elisabeth) DeMarco

c. Asha Patel, EGI
Dennis M. O'Leary, Aird & Berlis LLP
David Butters, APPrO

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an application by Enbridge Gas Inc. pursuant to Section 36(1) of the Act, for an order or orders approving its Demand Side Management Plan for 2022-2027.

EB-2021-0002

NOTICE OF INTERVENTION

ASSOCIATION OF POWER PRODUCERS OF ONTARIO

(APPrO)

June 10, 2021

A. Application for Intervenor Status

1. APPrO hereby requests status to intervene in the matter of the application by Enbridge Gas Inc. (the **Applicant**) to the Ontario Energy Board (the **OEB** or the **Board**) for order or orders approving the Applicant's proposed Demand Side Management (**DSM**) Plan for 2022-2027 (the **Application**). This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure* and the Board's notice dated May 19, 2021.

B. APPrO and its Interest in the Proceeding

2. APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators, suppliers of services, and equipment, and consulting service providers. APPrO's members produce electricity from natural gas, hydro, nuclear, wind, biogas and other sources.
3. APPrO's gas-fired generator members ("**GFGs**") are large volume customers within the Applicant's franchise areas. As customers, GFGs individually contract for significant quantities of natural gas services from the Applicant. The Applicant's 2022-2027 DSM Plan, which is the subject of this proceeding, stands to directly and materially affect the Applicant's GFG customers. Changes to the large volume customer DSM program are contemplated as part of the Application.¹ The Applicant also conducted specific engagement with large volume customers in preparing the Application.² APPrO has been an active participant in the Board's various DSM policy and rate proceedings over several years and has an ongoing interest in these matters.
4. APPrO hopes to provide the Board with the perspective of the Applicant's large volume customers. APPrO may make submissions, *inter alia*, on the Applicant's proposed DSM activities for the 2022 DSM program year, the base budget envelope for the 2022 DSM program year, the Large Volume strategy and program and the Applicant's "efforts to optimize the energy efficiency" of its large volume customers operations [Exhibit E, Tab 1, Schedule 6, p 2]; and the Next Generation Program's objective to "assist customers to be more efficient" and "lower average annual gas usage, help meet Ontario's GHG reduction goals and create opportunities to defer/avoid gas infrastructure" [Exhibit E, Tab 4, Schedule 6, Attachment 3, p 3].

¹ See Exhibit E, Tab 1, Schedule 6, p. 3-9.

² See Exhibit E, Tab 4, Schedule 6.

5. APPrO was an active participant in the Post-2020 Natural Gas Demand Side Management Framework Consultation proceeding (EB-2019-0003) and the one-year extension of the Applicant's 2021 DSM Plan Application (EB-2019-0271), and participated in the Mid-Term Review of the DSM Framework for Natural Gas Distributors (EB-2017-0127 / EB-2017-0128), Enbridge's and Union Gas Limited's (**Union's**) prior DSM Proceedings (EB-2015-0029 / EB-2015-0049), the Post-2020 DSM Framework Consultation Proceeding (EB-2019-0003), 2018 Cap and Trade Compliance Plans (EB-2017-0224 / EB-2017-0255 / EB-2017-0275), Mid-Term Review of the DSM Framework for Natural Gas Distributors (EB-2017-0127 / EB-2017-0128), Union's Panhandle Reinforcement Proceeding (EB-2016-0186), Enbridge Gas Inc.'s 2014-2018 IRM Proceeding (EB-2013-0459), Union's 2014-2018 IRM Proceeding (EB-2013-0202) and Enbridge's and Union's DSM Proceedings (EB-2015-0029 / EB-2015-0049).

C. Nature and Scope of APPrO's Intended Participation

6. APPrO intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. APPrO intends to participate to request information, participate in any requisite motions, test evidence through the stipulated processes, submit written interrogatories, if applicable, and provide submissions. Subject to the development of the record in this matter, APPrO may also submit evidence.

D. Costs

7. APPrO hereby requests cost eligibility in this proceeding. APPrO is, in accordance with s. 3.03(a) of the Board's *Practice Direction on Cost Awards*, eligible to seek an award of costs as APPrO is a party that primarily represents the direct interests of industrial consumers, including the Applicant's GFG ratepayers, in relation to services that are regulated by the Board.
8. APPrO also requests an award of costs in this proceeding on the basis that its comments and participation will serve a direct interest and policy perspective that is relevant to the Board's mandate and pressing for Ontario's energy consumers. The Board has granted APPrO cost eligibility in several Board proceedings, including each of those referred to above in paragraph 5.
9. APPrO therefore submits that it is appropriate for the Board to award APPrO costs in the context of this proceeding, and hereby requests cost eligibility.

E. APPrO's Representatives

10. APPrO hereby requests that further communications with respect to this proceeding be sent to the following:

Association of Power Producers of Ontario

67 Yonge Street
Suite 1040
Toronto, ON M5E 1J8

Attention: David Butters, President
Telephone: 416-322-6549, x231
Facsimile: 416-481-5785
Email: david.butters@appro.org

AND TO ITS COUNSEL

Resilient LLP

Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2

Attention: Elisabeth DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@resilientllp.com

Attention: Jonathan McGillivray
Tel: 647-208-2677
Facsimile: 1-888-734-9459
Email: jonathan@resilientllp.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS 10th day of June, 2021



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for APPrO