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August 19, 2021

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

Attention: Christine E. Long, Registrar and OEB Secretary

Dear Ms. Long:

**Re: Low Income Energy Network (LIEN)
Participation and Cost Eligibility Request
Updating the CDM Guidelines for Electricity Distributors – Request for Comments
OEB File No. EB-2021-0106**

Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network (“LIEN”). The OEB intends to develop updated CDM guidelines to replace the existing Conservation and Demand Management (“CDM”) Requirement Guidelines for Electricity Distributors. For this proceeding, the OEB invites written comments from interested parties on the OEB Staff Discussion Paper, *Updating the Conservation and Demand Management Guidelines for Electricity Distributors* (the “Discussion Paper”).

LIEN intends to submit comments on the Discussion Paper. 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

Distributor CDM programs and frameworks are critical to low-income consumers in so far as they may impact low-income consumers through the distributors' rates.

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 also participated in previous OEB hearings relating to development of CDM. LIEN intervened in Toronto Hydro-Electric System Limited's application for approval of its 2011-2014 CDM Programs (EB-2011-0011). LIEN also intervened in Hydro One Brampton Networks Inc.'s and Hydro One Networks Inc.'s applications seeking approval of their CDM programs.

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.

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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