

Sent by RESS Filing

September 23, 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)
Intervention and Cost Eligibility Request
Elexicon Energy Inc. (“Elexicon”) Application to raise its electricity distribution
rates for its Veridian rate zone and Whitby rate zone
OEB File No. EB-2021-0015**

Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network (“LIEN”). LIEN requests eligibility to intervene in Elexicon’s application to raise its electricity distribution rates for its Veridian rate zone and Whitby rate zone, effective January 1, 2022. 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

Elexicon’s Distribution System Plan (“DSP”) is part of Elexicon’s application and concerns Conservation and Demand Management (“CDM”) programming. 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 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. Furthermore, LIEN recently submitted comments on the OEB Staff Discussion Paper, *Updating the Conservation and Demand Management Guidelines for Electricity Distributors* (EB-2021-0106).

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.

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:

Judy Simon & Associates Inc.

RPO Queens Quay

PO Box 40008

Toronto, ON M5V 0A4

Email: judithbsimon@gmail.com

Contact information for Mr. Gardner and Ms. Vallani:

Willms & Shier Environmental Lawyers LLP
1 Toronto Street
Suite 900
Toronto, ON M5C 2V6

Matt Gardner:
(416) 862-4825
Email: mgardner@willmsshier.com

Madiha Vallani:
(416) 862-4835
Email: mvallani@willmsshier.com

Yours truly,



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

cc: LIEN Legal Subcommittee
Judy Simon

Document #: 2018797