

Direct Dial: (416) 862-4843  
File: 5148

Sent by Electronic Mail

July 24, 2008

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON, M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Low-Income Energy Network Intervention  
Board File EB-2008-0106**

---

We are writing on behalf of the Low-Income Energy Network (LIEN), pursuant to Rule 23.08 of the Board's *Rules of Practice and Procedure*, in response to the letters from Enbridge Gas Distribution Inc. and Union Gas Limited, dated July 22, 2008, objecting to the proposed nature and scope of LIEN's intervention.

The methodologies to be developed in this Proceeding do not stand in isolation from other strands of the Board's overarching, integrated exercise of fixing or approving "just and reasonable" rates. The issue of rate affordability is another matter to be considered by the Board in fixing or approving "just and reasonable rates".

LIEN's concern is that this Proceeding should not, inadvertently or otherwise, pre-empt or limit options to implement rate affordability assistance programs.

In its written submissions on the draft issues list dated July 23, 2008, LIEN has proposed the following additional issues for the Issues List in this Proceeding:

- ♦ What provision should be made, in the methodologies to be determined pursuant to this proceeding for commodity pricing, load balancing and cost allocation for natural gas distribution in relation to regulated gas supply, to accommodate and integrate a rate affordability assistance program for low-income consumers, prospectively and retrospectively, when such programs are developed?

The inclusion of that issue is a question for the Issues Hearing. It should not be pre-empted by a collateral attack on LIEN's intervention and eligibility for a costs award.



LIEN respectfully requests that the Board grant it full intervenor status and eligibility for an award of costs in this proceeding.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Paul Manning', is written over the typed name. The signature is fluid and cursive, with a large loop at the end.

Paul Manning

cc: Mr. Fred Cass, Counsel for Enbridge Gas Distribution Inc.  
Mr. Chris Ripley, Union Gas Limited  
All EB-2008-0106 Intervenors

Document #: 181614