

Direct Dial: (416) 862-4843
File: 5152

By Electronic Mail, Courier & RESS

July 25, 2008

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Consultation on Energy Issues Relating to Low Income Consumers
Board File No.: EB-2008-0150

Willms & Shier Environmental Lawyers LLP (W+SEL) is environmental legal counsel to the Canadian Environmental Law Association (CELA). As such, we enclose herein an intervention request letter for the above-noted proceeding on CELA's behalf.

Please send any communications regarding this proceeding to:

Willms & Shier Environmental Lawyers LLP
4 King Street West, Suite 900
Toronto, ON M5H 1B6

Attention: Mr. Paul Manning, Partner

Tel.: (416) 862-4843
Fax: (416) 863-1938
Email: pmanning@willmsshier.com

Attention: Ms. Tracy Richards, Law Clerk

Tel.: (416) 862-4834
Email: trichards@willmsshier.com



And to:

Canadian Environmental Law Association
Theresa A. McClenaghan
Executive Director and Counsel
130 Spadina Ave. Suite 301
Toronto, ON M5V 2L4

Tel. 416-960-2284 ext. 219
E-mail theresa@ccla.ca

Yours truly,

A handwritten signature in blue ink, appearing to read 'Paul Manning', with a large, sweeping flourish at the end.

Paul Manning

Encl.



CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

July 24, 2008

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St., 27th floor
Toronto, Ontario M4P 1E4

Dear Ms Walli,

Re: **Consultation on Energy Issues Relating to Low Income Consumers (Board File No.: EB-2008-0150)**

I am writing on behalf of the Canadian Environmental Law Association (CELA) to advise you that we intend to participate in the above-mentioned consultation process, and in particular wish to attend the stakeholder conference to be held the week of September 22nd.

CELA is one of Legal Aid Ontario's specialty law clinics under the clinic-law program. With a province-wide mandate, CELA serves members of the public from a broad and diverse group of clients that includes low-income and vulnerable communities. CELA provides client legal services and representation in a variety of environmental and administrative law tribunals and courts, and summary advice and brief legal services to a large number of Ontarians across a variety of statutes and environmental issues, including test case litigation. CELA also provides law reform, public legal education, community outreach and community development services in the areas of environmental law including access to justice, environmental health and environmental equity.

CELA was a founding member of the Low-Income Energy Network (LIEN), formed in 2004 and has participated on its steering committee since this network's inception. LIEN allows a variety of legal aid clinics, poverty activists, grass roots environmental organizations, and shelter advocates, to name a few communities to advance a priority action agenda to fight energy poverty and its impacts in Ontario. LIEN works to raise awareness of the impact of rising energy prices on low-income consumers and to work with policymakers and the utility sectors on solutions to energy poverty. Along with the other members of LIEN, we use the term energy poverty to describe the disproportionate burden of electricity, natural gas and other utility costs on low-income households which reduce the funds available for rent, food, clothing, transportation, medicine and other basic necessities.

CELA is concerned that rising costs for electricity and gas is eroding energy affordability for Ontario's low-income households, and that we need a comprehensive energy poverty strategy in place in the province, comprised of:

- An energy rate affordability program,
- targeted low-income energy conservation/efficiency programs at no-cost to participants, and with as extensive measures as practicable to provide deep reductions in energy use,
- extensive consumer education about energy conservation and available programs to support conservation activities, and
- adequately funded emergency energy assistance to help low-income households in short-term financial crisis.

CELA also works extensively on related energy issues which also have important implications for low income residents in Ontario. For example, in our work on conservation and renewable power, we advocate that programs include low income residents, and in our work regarding environmental issues arising from energy supply options, we are concerned to advocate for solutions that take account of energy affordability as well as sustainability.

We wish to be considered for cost eligibility for our participation in the stakeholder conference, and will be collaborating with LIEN and the other LIEN steering committee intervenors to minimize duplication.

Yours sincerely,

Original signed by

Theresa McClenaghan
Executive Director and Counsel
Canadian Environmental Law Association
E-mail: theresa@cela.ca
416-960-2284ext. 219