### **ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for an Order or Orders approving the balances and clearance of certain non-commodity 2020 Demand Side Management Deferral and Variance Accounts into rates, within the next available QRAM.

### NOTICE OF INTERVENTION

### OF THE

#### SCHOOL ENERGY COALITION

- 1. The School Energy Coalition ("SEC") applies for intervenor status in this proceeding.
- 2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board's website, here:

# http://www.rds.oeb.ca/HPECMWebDrawer/Record/589545/File/document

3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

# **Issues to be Addressed**

- 4. SEC's intended participation will include the following:
  - a. The appropriateness and reasonableness of the amounts claimed by the Applicant in the deferral and variance accounts;
  - b. The relationship of the Applicant's claims to the results of the Board-mandated EM&V process, and the reasons for differences, if any;
  - c. The methodology and details of the proposed allocation of those account balances to classes, and proposed methods of recovery of those amounts within those classes;
  - d. The timing and details of proposed recovery of the amounts in the accounts; and
  - e. Generally, to represent the interests of school boards and their students in this process.

# The Intervenor's Intended Participation

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearings of this matter, and in written or oral submissions, as well as any other parts of the process that the

Board should order. While SEC does not currently intend to file evidence in this proceeding, it reserves its right to do so depending on the responses to interrogatories and any other discovery processes ordered by the Board.

# **Nature of Hearing Requested**

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

# Counsel/Representative

- 7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:
  - a. School Energy Coalition: (electronic copies only)

## ONTARIO EDUCATION SERVICES CORPORATION

c/o Ontario Public School Boards Association

439 University Avenue, 18<sup>th</sup> Floor Toronto, ON M5G 1Y8

Attn: Ted Doherty, Executive Director

Phone: 416-340-2540 Fax: 416-340-7571

Email: SEC@oesc-cseo.org

b. SEC's counsel: (electronic copies only)

### SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION

2200 Yonge Street, Suite 1302 Toronto, Ontario, M4S 2C6

Attn: Jay Shepherd Phone: 647-804-2767 Fax: 416-438-3305

Email: jay@shepherdrubenstein.com

With an electronic copy to:

Attn: Mark Rubenstein Phone: 647-483-0113

Email: mark@shepherdrubenstein.com

Respectfully, submitted on behalf of the School Energy Coalition this January 27, 2022.

Jay Shepherd
Counsel for the School Energy Coalition

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