

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 90(1) and section 97 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the City of Toronto.

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:

<https://www.rds.oeb.ca/CMWebDrawer/Record/737250/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 need for the proposed facilities;
 - b. The timing, impacts, costs and benefits of the proposed facilities;
 - c. The extent, if any, that the Applicant can avoid or defer the facility through targeted conservation activities, consistent with past guidance from the Board;
 - d. The cost responsibility for the proposed facilities, and the impact, if any, of the purported termination of the Keating Railway Bridge license;
 - e. The Application’s conformity to the EB-2020-0198 decision issued on February 19, 2021; and
 - f. 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, 18th 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: Fred Zheng
Phone: 647-483-0114
Fax: 416-438-3305
Email: fred@shepherdrubenstein.com

With an electronic copy to:

Attn: Jay Shepherd
Phone: 416-804-2767
Email: jay@shepherdrubenstein.com

Respectfully, submitted on behalf of the School Energy Coalition this April 1, 2022.

Fred Zheng
Counsel for the School Energy Coalition