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November 25, 2022

Via RESS

Ms. Nancy Marconi Registrar **Ontario Energy Board** 2300 Yonge Street, 27th Floor Toronto, Ontario M4P 1E4

RE: Enbridge Gas Inc. 2024 Rebasing Application Ontario Energy Board File Number: EB-2022-0200 Intervention Request - Ontario Association of Physical Plant Administrators

Dear Ms. Marconi:

Jupiter Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators (OAPPA) to assist the association on matters related to the above-noted application. Jupiter is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as an intervenor in the EB-2022-0200 proceeding and provides the following information:

- 1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario, most of whom are distribution customers of Enbridge Gas Inc. As a result, OAPPA member universities have a direct interest in this proceeding. At this time, OAPPA anticipates being active in all aspects of the proceeding, to ensure the resulting rate levels, structures, and terms and the conditions of service, including rate harmonization and Incentive Rate-setting Mechanism proposals, are fair and reasonable.
- 2. OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.
- 3. The information required by Section 3.03.1 of the Board's Practice Direction on Cost Awards is provided in the attachment to this letter.

4. OAPPA requests that all correspondence and documents be directed to:

Valerie Young, BSc (Hon), BEd Consulting Associate c/o Jupiter Energy Advisors Inc. 21 Four Seasons Place, Suite 101 Toronto, Ontario M9B 6J8

Telephone: 416.999.3698 E-mail: valerie.young@askJupiter.ca

Scott Walker, MBA, P.Eng. Principal, President and CEO Jupiter Energy Advisors Inc. 21 Four Seasons Place, Suite 101 Toronto, Ontario M9B 6J8

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E-mail:	scott.walker@askJupiter.ca

Should you have questions or require further information, please contact me at the above number.

Yours truly,

C. wellen, P.E.

Scott Walker

- cc. V. Innis, EGI (e-mail)
 - D. Stevens, Aird and Berlis (e-mail)
 - D. O'Leary, Aird & Berlis (e-mail)
 - N. Splinter, OAPPA / Queen's University (e-mail)
 - V. Young, c/o Jupiter Energy Advisors (e-mail)

ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS Information Required by Section 3.03.1 of the Practice Direction on Cost Awards

The Ontario Association of Physical Plant Administrators (OAPPA) is a not-for-profit organization whose membership includes the physical plant administrators for the following institutions:

Algoma University College Brock University Carleton University University of Guelph Lakehead University Laurentian University McMaster University Nipissing University Ontario College of Art and Design University University of Ottawa Queen's University

Ryerson University University of Toronto University of Toronto – Mississauga University of Toronto – Scarborough Trent University University of Ontario Institute of Technology University of Waterloo Western University Wilfred Laurier University University of Windsor York University

OAPPA's Mission Statement: To assist higher education facilities, officers and staff develop, maintain, and promote high standards and professional ideals for the management of campus facilities.

The objective of OAPPA is to promote co-operation among physical plant administrators of the provincially assisted universities of Ontario, and other groups, on matters relating to staff development and planning, construction, operation and maintenance of facilities. The OAPPA Energy Committee meets regularly to review and discuss provincial government reporting. The committee is also involved with the sector-wide benchmarking of energy performance, energy purchasing and hedging strategies, and market analysis.

OAPPA participates in Ontario Energy Board proceedings through its Energy Committee. Its participation in natural gas related proceedings has focused primarily on the rate proceedings of Enbridge Gas Inc. The majority of OAPPA members are customers of Enbridge Gas with some members in the current EGD zone and others in the current Union zones. From an operating perspective, the rate structures, rate levels, and terms and conditions of service are of direct and significant importance to OAPPA.

Consistent with the main objective of OAPPA, most interventions are conducted through the association rather than by individual members. Since issues are frequently of common interest, an OAPPA intervention provides the opportunity to address matters in a coordinated, efficient, and cost-effective way.

OAPPA is assisted in its interventions at the Ontario Energy Board by its external advisor, Jupiter Energy Advisors Inc. Jupiter performs several functions: providing case management services, assisting OAPPA to understand the issues and identify those on which it will participate actively, advising on the formulation of positions, and representing OAPPA at the OEB. The Chair of the OAPPA Energy Committee is Jupiter's primary contact, and the current Chair of this Committee is Mr. Nathan Splinter, Manager – Energy, Sustainability, CHP, Refrigeration at Queen's University. The individuals who are Jupiter's representatives for a given OAPPA intervention are provided in OAPPA's letter of intervention