

From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Thursday, January 16, 2025 1:44 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: amanda@elsonadvocacy.ca
Subject: Intervention Form: EB-2024-0198 - Environmental Defence

Intervention Form

Case Number:

EB-2024-0198

Intervenor Name:

Environmental Defence

Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

Governance Structure:

Refer to the Frequent Intervenor Form below.

Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.

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Other Contacts:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
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Frequent Intervenor Form:

<https://www.rds.oeb.ca/CMWebDrawer/Record/804452/File/document>

OEB Proceedings:

Environmental Defence has been granted intervenor status in the following proceedings for the last 12 months:

EB-2022-0200/EB-2024-0111 - Enbridge Gas Rebasing – Phases 1 & 2
EB-2023-0195 - Toronto Hydro 2025-2020 Rates
EB-2023-0197 - Hydro One - K4 Reconductoring
EB-2023-0201 - Eganville Community Expansion
EB-2023-0261 - Neustadt Community Expansion
EB-2023-0336 - OPG Market Renewal Program
EB-2024-0004 IESO 2024/25 Fees
EB-2024-0067 - EGI 5-Year Gas Plan
EB-2024-0141 - Overlea Station Relocation

Environmental Defence was denied intervenor status in only one proceeding in the last 24 months (EB-2024-0193).

Issues:

Environmental Defence wishes to explore all aspects of Enbridge's proposals, including the budgets, targets, target adjustment mechanism, incentives, cost-effectiveness screening, program offerings, avoided cost figures, and other issues relevant to Environmental Defence's mandate.

Environmental Defence's intended participation includes a focus on improving ease of access to the Enbridge offerings so as to improve uptake and cost-effectiveness. Historically, DSM programming requires too much paperwork, up-front capital outlays by customers (which many cannot afford), and excessive delays in providing rebates. This limits participation of many people who do not want to spend their time in this way and cannot afford to cover up-front costs while waiting for rebates. Although some improvements have been made in this regard, more are needed.

As detailed below, Environmental Defence and the Green Energy Coalition will coordinate to avoid duplication.

Policy Interests:

Environmental Defence's interest in this proceeding is in promoting both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through measures that lower both costs and environmental impacts.

Hearings:

Environmental Defence requests an oral hearing as the issues warrant one. Holding an oral hearing would be consistent with all past DSM plan hearings.

Evidence:

Environmental Defence intends to co-sponsor evidence of the Energy Futures Group alongside the Green Energy Coalition. This will involve a similar analysis of the DSM plan as was provided in the previous DSM proceeding, which was relied on by the OEB in that proceeding. Environmental Defence seeks an opportunity to file the details and a cost estimate jointly with the Green Energy Coalition following Procedural Order #1.

Coordination with Other Intervenor:

ED intends to coordinate its efforts with GEC, as it has done in other OEB proceedings, such as EB-2022-0200 and EB-2024-0111. Where possible, GEC and ED will combine efforts and use one lawyer; however, this may not always be possible given that they have distinct interests.

This approach is consistent with the OEB's decision in Procedural Order No. 1 in phase 2 of the Enbridge Gas Rebasing proceeding (EB-2024-0111) - <https://www.rds.oeb.ca/CMWebDrawer/Record/850530/File/document>. In that decision, Enbridge sought an order that the interventions of ED and GEC be combined. The OEB ruled

as follows: “The OEB is satisfied that GEC and Environmental Defence have distinct interests and therefore does not see a need to require the interventions of GEC and Environmental Defence to be combined.”

Cost Awards:

Environmental Defence is eligible for a cost award primarily under s. 3.03(b) of the Practice Direction as it primarily represents an interest or policy perspective relevant to the Board’s mandate and to the proceeding for which cost award eligibility is sought, namely environmental and climate protection. In addition, with respect to s. 3.03(a) of the practice direction,

Environmental Defence also represents the interests of consumers whose energy bills can be reduced through measures that lower both costs and environmental impacts.

Language Preference:

Environmental Defence does not intend to participate in French.