



April 2, 2025

**VIA RESS**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Registrar

Dear Ms. Marconi,

**Re: Enbridge Gas Inc. ("EGI")  
2024 Rebasing – Phase 3  
Board File No.: EB-2025-0064**

We are counsel to the Ontario Home Builders' Association ("**OHBA**"). Please find attached OHBA's notice of intervention and request for cost eligibility in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a horizontal stroke that curves upwards and to the right.

Lisa (Elisabeth) DeMarco

c. Vanessa Innis, EGI  
David Stevens, Aird & Berlis LLP  
Scott Andison, CEO, OHBA

Att.

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Enbridge Gas  
Inc, pursuant to section 36(1) of the Ontario Energy Board  
Act, 1998, for an order or orders approving or fixing just and  
reasonable rates and other charges for the sale, distribution,  
transmission and storage of gas as of January 1, 2024.

**EB-2025-0064**

**NOTICE OF INTERVENTION**

**ONTARIO HOME BUILDERS' ASSOCIATION**

**April 2, 2025**

## **A. Application for Intervenor Status and Reasons for Late Request**

1. The Ontario Home Builders' Association ("**OHBA**") hereby requests late intervenor status in Phase 3 and any subsequent phases in the matter of the application of Enbridge Gas Inc. (the "**Applicant**" or "**EGI**") to the Ontario Energy Board (the "**OEB**" or the "**Board**") for approval for an order or orders approving or fixing just and reasonable rates for the sale, distribution, transmission, and storage of gas commencing January 1, 2024 (the "**Application**"). This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure*.

### ***About OBHA***

2. OHBA is the voice of the building, land development and professional renovation industry in Ontario. It is a voluntary association whose primary goal is to positively impact provincial legislative, regulatory and tax policies that affect the industry. OHBA is an advocacy association which is composed of an executive committee, a Board of Directors, five standing committees, and three councils. OHBA collects, analyzes, and distributes information to its members and the general public; promotes innovation and professionalism within the industry; promotes affordability and choice in housing; and provides group benefit plans and other membership services.
3. OHBA has over 4,000 members in 28 local chapter associations across Ontario. OHBA members have built more than 700,000 homes since 2007, and in more than 500 Ontario communities. The residential construction industry employs more than 500,000 people across the province, and contributes more than \$66.6 billion dollars to Ontario's economy.

### ***Reasons for Late Request***

4. OHBA only recently became aware that the issues under consideration in Phase 3 may have material implications for its members, including the potential to impact the cost and timing of new residential development projects across Ontario. Upon becoming aware of the scope and significance of Phase 3, OHBA acted promptly and has sought the Applicant's consent to this late request for intervenor status.<sup>1</sup>
5. OHBA's members include residential builders, developers, and professionals who rely on timely and cost-effective access to energy infrastructure to meet Ontario's growing housing demand and ensure compliance with evolving building standards. OHBA has a strong interest in ensuring that consumer choice remains available, and that all viable, affordable, and accessible energy options continue to be available in communities across the province. This is especially critical in areas where electricity infrastructure is not yet available, where expansion is constrained, or where fuel choice supports housing affordability and efficient community planning.

---

<sup>1</sup> We understand that the Applicant has consented to this late request for intervenor status and will communicate same to the Board in due course.

6. OHBA is conscious of the Board's current timelines and does not wish to delay the proceeding. In this regard, OHBA does not seek to have any aspect of Phase 1 or Phase 2 issues reconsidered or reopened and fully accepts the record in Phase 1 and Phase 2.
7. OHBA submits that granting intervenor status for Phase 3 of the Application will not prejudice the Applicant or other intervenors nor will it disadvantage any of the parties, and, instead, will assist the Board by contributing insights into how Phase 3 outcomes may affect housing delivery, infrastructure coordination, and long-term energy planning for the home building sector in Ontario.

**B. OHBA and its Interest in the Proceeding**

8. OHBA intends to make submissions, *inter alia*, on the Applicant's evidence in respect of:
  - whether the proposed harmonized rates and related charges, based on the updated 2024 Revenue Requirements, are just and reasonable;
  - whether the proposed rate design of harmonized rate classes is appropriate, including the rate design for (i) general service, (ii) in-franchise contract, and (iii) ex-franchise rate classes;
  - the appropriateness of the proposed rate harmonization implementation plan;
  - whether the Applicant has identified and responded appropriately to all relevant OEB directions and commitments made in OEB proceedings, including the filing of updated written marketing materials or reference materials aimed at customers, potential customers, HVAC contractors or builders that include or previously included energy comparison information; and
  - generally, any other matters that promote or otherwise represent the interests of OHBA and its members.

**C. Nature and Scope of OHBA's Intended Participation**

9. OHBA intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors cost-effectively and efficiently, where common issues may arise and may be addressed. OHBA intends to participate to request information, participate in any requisite motions, test evidence through the stipulated processes, submit written interrogatories, and provide submissions.

**D. Costs**

10. OHBA hereby requests cost eligibility in this proceeding. OHBA is, in accordance with s. 3.03(b) of the Board's *Practice Direction on Cost Awards* (the "**Practice Direction**"), eligible to seek an award of costs as OHBA is a party that primarily represents an interest or policy perspective that is relevant to the Board's mandate and to the proceeding.

11. OHBA primarily represents a policy perspective relevant to the Board's mandate, particularly as it relates to ensuring the cost-effective, timely, and equitable provision of energy infrastructure to support housing development. OHBA requests an award of costs in this proceeding on the basis that its comments and participation serve a direct interest and policy perspective that is relevant to the Board's mandate and pressing for Ontario.
12. In the alternative, OHBA is, in accordance with s. 3.03(a) of the Practice Direction, eligible to seek an award of costs as OHBA represents the interests of energy consumers, including homebuilders and new homebuyers and occupants of residential developments across Ontario.
13. OHBA therefore submits that it is appropriate for the Board to award OHBA costs in the context of this proceeding, and hereby requests cost eligibility.

**E. OHBA's Representatives**

14. OHBA hereby requests that further communications with respect to this proceeding be sent to the following:

**Scott Andison**  
Ontario Home Builders' Association  
251 Consumers Road, Suite 301  
Toronto, ON M2J 4R3

Email: [sandison@ohba.ca](mailto:sandison@ohba.ca)

**AND TO ITS COUNSEL**

**Resilient LLP**  
119 Baby Point Road  
Toronto, ON M6S 2G7

Attention: Lisa (Elisabeth) DeMarco  
Telephone: 647-991-1190  
Facsimile: 1-888-734-9459  
Email: [lisa@resilientllp.com](mailto:lisa@resilientllp.com)

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS 2<sup>nd</sup> day of April 2025

A handwritten signature in black ink, appearing to be 'Lisa', written above a horizontal line.

Lisa (Elisabeth) DeMarco  
Resilient LLP  
Counsel for OHBA