

Direct Dial: (416) 862-4843  
File: 5208

Sent by Courier and Electronic Mail

November 18, 2008

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Expression of Interest and Cost Eligibility Request on Behalf of the  
Low-Income Energy Network (LIEN)  
Board File No. EB-2008-0346 - Consultation on the Development of Demand  
Side Management Guidelines for Natural Gas Distributors**

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Willms & Shier Environmental Lawyers LLP (W+SEL) is environmental legal counsel to the Low-Income Energy Network (LIEN).

### **EXPRESSION OF INTEREST**

In accordance with section 23 of the Ontario Energy Board ("Board") Rules of Practice and Procedure, we hereby make an expression of interest in the above-noted proceeding on behalf of our client LIEN.

### **INTEREST IN THE PROCEEDING AND REQUEST FOR INTERVENTION**

LIEN is an organization of more than 75 member associations from across Ontario, including, energy, public health, legal, tenant/housing, education, social and community organizations. LIEN is directed by a Steering Committee. In addition to the LIEN Steering Committee, members and supporting organizations, over 35 individuals have indicated their support for LIEN.

As an umbrella organization, LIEN offers the opportunity for one entity to represent the similar interests of many organizations that have come together under LIEN. A detailed description of LIEN's organization can be found on its website ([www.lowincomeenergy.ca](http://www.lowincomeenergy.ca)). LIEN is a well recognized Intervenor in other Board proceedings, including those concerning the issue of Demand Side Management.



LIEN's "mission statement" is in itself a statement of LIEN's interest in this proceeding.

*The Low-Income Energy Network:*

- ♦ *aims to ensure universal access to adequate, affordable energy as a basic necessity, while minimizing the impacts on health and on the local and global environment of meeting the essential energy and conservation needs of all Ontarians, and*
- ♦ *promotes programs and policies which tackle the problems of energy poverty and homelessness, reduce Ontario's contribution to smog and climate change, and promote a healthy economy through the more efficient use of energy, a transition to renewable sources of energy, education and consumer protection.*

LIEN intends to participate actively and responsibly throughout the proceeding.

## **NATURE AND SCOPE OF INTERVENTION**

Together with the interest of its numerous individual members and supporting organizations, LIEN has a clear interest in Demand Side Management for natural gas markets in Ontario. As such, LIEN has a substantial interest in the issues under EB-2008-0346, pursuant to Rule 23.02. LIEN's interest in this proceeding is to advance its views and protect its interests by bringing knowledge and experience to the making of better decisions.

## **COSTS**

LIEN requests that the Board find it eligible for costs under section 3.03(a) of the Board's *Practice Direction on Cost Awards*. LIEN "primarily represents the direct interests of consumers in relation to regulated services", in particular, low-income consumers. LIEN has been accepted as a party eligible for an award of costs in other proceedings before the Board.

As a not-for profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other intervenors to avoid duplication where possible.

LIEN has retained Malcolm Jackson of FRC Canada to provide consulting advice to LIEN and W+SEL in this proceeding.

LIEN respectfully requests an early determination by the Board that it is eligible for an award of costs in this proceeding.



## CONTACT INFORMATION

LIEN requests that copies of written materials in electronic or other format concerning this proceeding, be sent to:

Willms & Shier Environmental Lawyers LLP  
4 King Street West, Suite 900  
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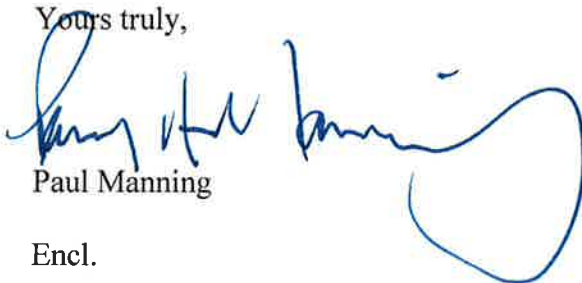
And to:

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Yours truly,



Paul Manning

Encl.

cc: LIEN

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