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December 4, 2025

Ritchie Murray – Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: Board File No. EB-2024-0198 – Enbridge Gas Inc. 2026 DSM Application  
The Low-Income Energy Network’s Response to Enbridge Gas Inc.’s Cost Claim  
Objections**

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Willms & Shier Environmental Lawyers LLP is counsel for the Low-Income Energy Network (“LIEN”) in the above referenced proceeding. We set out below our response to Enbridge Gas Inc.’s (“EGI”) letter dated November 27, 2025 and specifically EGI’s comments on LIEN’s cost claim. Ms. Shelley Grice, consultant for the Vulnerable Energy Consumers Coalition (“VECC”), has reviewed and endorsed LIEN’s response to EGI’s comments in this letter.

### **LIEN’S COST CLAIMS REFLECT A REASONABLE COST OF CO-ORDINATION**

In January 2025, EGI requested that the OEB require parties with similar interests to combine their interventions to reduce hearing time and cost claims. In particular, EGI requested that the OEB require LIEN and VECC to combine their interventions.

In response, LIEN stated that although LIEN and VECC have vastly different objectives and members, they share an interest in the protection of low-income consumers and thus would collaborate and co-ordinate their interventions to the extent necessary, where their interests align.

The OEB found that given interests represented by LIEN and VECC, both had a substantial interest in the proceeding and decided that LIEN’s and VECC’s interventions should be co-ordinated for the purposes of efficiency.

Throughout this proceeding, LIEN and VECC made reasonable efforts to co-ordinate their intervention to the extent possible with LIEN taking the lead on asking questions at the Technical Conference and also in drafting LIEN’s and VECC’s joint written submissions.

The fact that VECC's cost claim (\$11,847.35) is less than LIEN's cost claim (\$33,776.35) indicates that co-ordination between LIEN and VECC was effective. This is because LIEN took the lead for the most part in reviewing the evidence for EGI's rollover application, preparing for, and asking questions at the Technical Conference, and drafting joint written submissions on behalf of both LIEN and VECC. LIEN's cost claim is justified and reasonable.

If we take the average of LIEN's and VECC's total cost claims we arrive at \$22,811.85 each, which is slightly more than what EGI is proposing LIEN's cost claims should be (i.e., \$21,297.69). However, as agreed to between LIEN and VECC for collaboration purposes at the outset, LIEN took the lead in collaborating its intervention with VECC. It is therefore reasonable that LIEN's costs are higher than VECC's. LIEN spent more time (including by legal counsel for LIEN; VECC did not retain legal counsel) to review the evidence, review procedural orders, participate in and ask questions at the Technical Conference, and draft and finalize joint submissions on behalf of both LIEN and VECC, while also spending time and resources in co-ordinating with VECC. Co-ordination involved consulting with VECC, reviewing, discussing, and integrating VECC's feedback, and obtaining VECC's final approval on joint activities including questions for the Technical Conference and the final joint written submissions.

Collaboration takes time and resources. LIEN's co-ordination with VECC resulted in higher costs for LIEN, but may result in lower costs to both EGI and OEB as the joint collaboration resulted in only one submission to review and only one intervention at the Technical Conference.

Respectfully, LIEN submits that EGI cannot both request and expect collaboration between different interveners such as LIEN and VECC but respond to each intervener's cost claims separately by ignoring the cost of collaboration and the division of labour between the collaborating intervenors.

If the OEB grants EGI's recommendation that LIEN's cost claims be no more than \$21,297.69, this would, in essence, penalize LIEN for taking a leadership role in and in co-ordinating its intervention with VECC in order to promote efficiency in the proceeding. As such, LIEN respectfully submits that there would be no real value to collaboration if the cost of collaboration is ignored.

### **LIEN'S COST CLAIMS INCLUDE BOTH LEGAL COUNSEL AND TECHNICAL CONSULTANT COSTS**

By recommending that LIEN's cost claims be reduced, it appears that EGI is essentially asking the OEB to not award LIEN's costs for legal counsel. LIEN respectfully submits that this is inappropriate given that LIEN requires both legal counsel and a technical consultant to meaningfully participate in OEB proceedings on behalf of its members and constituents.

LIEN's counsel and technical consultant Judy Simon (as well as VECC's technical consultant Ms. Grice) agreed that LIEN's counsel would undertake procedural matters with the OEB and draft legal submissions, whereas Ms. Simon and Ms. Grice would jointly review the evidence in order to draft joint questions to be asked by Ms. Simon at the Technical Conference, and collaborate with counsel to draft joint technical submissions on behalf of LIEN and VECC.

LIEN respectfully submits that its cost claims are reasonable in light of LIEN's efforts and leadership in coordinating with VECC. Therefore, LIEN respectfully requests that its cost claims be approved without any reduction.

Yours truly,



Ali Naraghi  
Associate

cc: Judy Simon  
Shelley Grice  
LIEN Legal Subcommittee

Encl.

1410-9923-6378, v. 1