

Reply to the Attention of Mike Richmond
Direct Line 416.865.7832
Email Address mike.richmond@mcmillan.ca
Our File No. 231915
Date September 25, 2015

VIA RESS AND EMAIL

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0179 – Union Gas Limited Community Expansion Program
Letter of Intervention for Canadian Propane Association**

We are the lawyers for the Canadian Propane Association (“CPA”). CPA requests that it be granted intervenor status in the Ontario Energy Board (the “Board”) application bearing no. EB-2015-0179 brought by Union Gas Limited (“Union”).

CPA is the national voice of the propane industry in Canada, representing over 400 member companies in every region of the country. Members include propane producers, wholesalers, transporters, equipment and appliance retailers, manufacturers, and distributors, and associated industries.

CPA works with governments and regulators on policy issues that affect the propane industry, such as providing cost efficient energy to consumers. It provides key services such as industry training through the Propane Training Institute and emergency response for liquid propane gas and flammable liquids through Emergency Response Assistance Canada. CPA also provides industry members with a forum to collaborate on best practices for propane.

CPA’s grounds for, and interest in, this application are twofold. First, CPA represents propane industry members who currently serve the communities that Union seeks to supply with natural gas through this application. If natural gas becomes available in those communities as an alternative to propane, the CPA members serving those communities will be directly impacted.

Second, in Ontario, propane usage is at its highest in remote and rural areas. The reason for this is that propane can be supplied to those communities in an economic manner, while natural gas cannot. The future of the propane industry is closely tied to the future of

uneconomic natural gas expansion to remote and rural areas. Thus, CPA has a strong interest in this application.

CPA anticipates that it will participate in all aspects of this application, including evidence, interrogatories, cross-examination and argument. CPA believes that an oral hearing is likely appropriate because this is the first application of this type to come before the Board and the Board will need to consider a number of significant policy issues.

CPA requests that copies of written evidence and all circulated correspondence related to this matter be directed as follows:

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CPA requests that it be found eligible for recovery of its reasonably incurred costs of its intervention in this application. CPA represents the interests and policy perspectives of the propane industry, which includes the development of an efficient and cost effective energy sector. This is relevant to the Board's mandate and the policy considerations underlying this application. CPA submits that it meets the eligibility requirements under section 3.03(b) of the Board's *Practice Direction on Cost Awards*.

Yours truly,



Mike Richmond

Copied by email: Charles Keizer, Torys (ckeizer@torys.com)
Chris Ripley, Union Gas Limited (cripley@uniongas.com)