

Barry R. Scott, LL.B., ACCI., FCCI.

Jeffrey A. Bell, B.A.(Hons.), B.Ed., LL.B.

E. Glenn Hines, B.Sc., LL.B.

Wayne A. Petrie, B.A., LL.B. (Associated)

Ian S. Wright, B.A., LL.B.

John D. Goudy, B.A.(Hons.), LL.B., B.C.L.

Erin M. Naylor, B.PAPM., LL.B.

A. David Brander, B.A., LL.B. (1953-2011)

Suite 200 - 252 Pall Mall Street

London, Ontario N6A 5P6

Telephone: 519 433-5310

Facsimile: 519 433-7909

Ext 236

e-mail: jgoudy@scottpetrie.com

July 16, 2016

VIA ELECTRONIC FILING

Attention: Kirsten Walli, Board Secretary

Ontario Energy Board

2300 Yonge Street

27th Floor

Toronto, ON M4P 1E4

Dear Madam Secretary:

**RE: Union Gas Ltd. – Panhandle Reinforcement Project – OEB File No. EB-2016-0186
CAEPLA-PLC Intervention Request Letter – Our File No. 18162**

We are the lawyers for the Canadian Association of Energy and Pipeline Landowner Associations (“CAEPLA”) and its subcommittee, the Panhandle Landowner Committee (“PLC”), and are writing to request intervenor status and cost award eligibility in the above noted proceeding under the name CAEPLA-PLC.

CAEPLA-PLC and its interest in this proceeding

CAEPLA is a federally incorporated not-for-profit organization representing landowners from across Canada. CAEPLA has been at the forefront of active engagement with pipelines companies and federal and provincial regulators to develop new and better right-of-way agreements, construction and remediation methodology, and compensation provisions to address the impacts of pipeline construction and operation on agricultural landowners. CAEPLA and its regional associations have intervened on behalf of landowner members in many federal and provincial regulatory hearings.

CAEPLA’s membership includes a large number of individual landowners directly affected by Union Gas Limited’s proposed Panhandle Reinforcement Project (see enclosed Schedule “A” property listing). In this proceeding, directly affected landowner members intend to participate under the PLC subcommittee of CAEPLA and to attempt to ensure that the environmental and socio-economic impacts of the proposed project are properly assessed and addressed by Union Gas Limited and the OEB.

One of CAEPLA's founding member organizations is the Gas Pipeline Landowners of Ontario ("GAPLO"), which has previously intervened in OEB proceedings (including EB-2010-0381, EB-2008-0411, EB-2005-0550 and EB-2014-0261). In its proposed intervention, CAEPLA-PLC will draw on the extensive knowledge and experience of GAPLO in addressing the effects of proposed Union Gas Limited projects.

None of CAEPLA, GAPLO or PLC is a frequent intervenor before the OEB.

Nature and scope of CAEPLA-PLC's intended participation

CAEPLA-PLC intends to participate actively in the proceeding by submitting interrogatories, evidence and argument. CAEPLA-PLC requests that an oral hearing, preceded by a written discovery process and a settlement conference, be held in this matter so that it will have the opportunity to cross-examine Union Gas Ltd.'s witnesses.

Request for written evidence

CAEPLA-PLC requests that a copy of the written evidence upon which the Application is based be provided to its lawyers.

Cost award

CAEPLA-PLC requests a determination by the Board that it is eligible for a cost award in this proceeding. CAEPLA-PLC primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding (the interests of pipeline landowners) and its membership includes persons with an interest in land that is affected by Union Gas Ltd.'s application (see enclosed Schedule "A" property listing). The ability of CAEPLA-PLC and its landowner members to participate in this proceeding is dependent upon a determination that CAEPLA-PLC is eligible for a cost award.

CAEPLA-PLC contacts

If intervenor status is granted to CAEPLA-PLC as requested above, documents in this proceeding may be served on and delivered to CAEPLA-PLC as follows:

Attention: David R. Core, CEO

CAEPLA
#257-918 Albert Street
Regina, SK S4R 2P7

Tel: (306) 522-5000
Fax: (306) 522-5006
Email: davecore@caepla.org

-and-

Attention: John D. Goudy

Scott Petrie LLP
200-252 Pall Mall St.
London, ON N6A 5P6

Tel: (519) 433-5310, ext. 236
Fax: (519) 433-7909
Email: jgoudy@scottpetrie.com

We trust this is satisfactory and look forward to the Board's consideration of CAEPLA-PLC's requests. Should you require any further information, please do not hesitate to email or call me.

Yours truly,

SCOTT PETRIE LLP
LAW FIRM



John D. Goudy

Encl.

c.c.: Karen Hockin, Union Gas Limited
Charles Keizer, Torys LLP

SCHEDULE "A"

AFFECTED PROPERTIES OWNED BY CAEPLA-PLC MEMBERS

	<u>Union #</u>	<u>PIN</u>		<u>Union #</u>	<u>PIN</u>
1.	P31	PIN: 007690229 LT	38.	P110	PIN: 433880095 LT
2.	P39a	PIN: 007700017 LT	39.	P114	PIN: 433880068 LT
3.	P40	PIN: 007700084 LT	40.	P117	PIN: 433880065 LT
4.	P41	PIN: 007700085 LT	41.	P122	PIN: 433850066 LT
5.	P42	PIN: 007700184 LT			
6.	P49	PIN: 007680009 LT			
7.	P52	PIN: 007680017 LT			
8.	P59	PIN: 007530024 LT			
9.	P61	PIN: 007560007 LT			
10.	P62	PIN: 007560067 LT			
11.	P63	PIN: 007560009 LT			
12.	P64	PIN: 007560010 LT			
13.	P66	PIN: 007560048 LT			
14.	P67	PIN: 007560053 LT			
15.	P69	PIN: 007560050 LT			
16.	P71	PIN: 007560060 LT			
17.	P72	PIN: 007560020 LT			
18.	P73	PIN: 007570007 LT			
19.	P74	PIN: 007570036 LT			
20.	P75	PIN: 007570039 LT			
21.	P78	PIN: 007570043 LT			
22.	P79	PIN: 007570046 LT			
23.	P81	PIN: 007570044 LT			
24.	P87	PIN: 005920024 LT			
25.	P88	PIN: 005920081 LT			
26.	P89	PIN: 005940018 LT			
27.	P91	PIN: 005940104 LT			
28.	P92	PIN: 005940103 LT			
29.	P96	PIN: 005950008 LT			
30.	P98	PIN: 005950043 LT			
31.	P99	PIN: 005950027 LT			
32.	P103	PIN: 433870109 LT			
33.	P104	PIN: 433870111 LT			
34.	P105	PIN: 433870108 LT			
35.	P107	PIN: 433870080 LT			
36.	P108	PIN: 433870078 LT			
37.	P109	PIN: 433870079 LT			