



April 11, 2017

**VIA RESS & COURIER**

Ontario Energy Board  
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File no. A155258

**Attention: Kirsten Walli**  
**Board Secretary**

Dear Ms. Walli:

**Re: EPCOR Southern Bruce Expansion Applications - EB-2016-0137/0138/0139**  
**Phase 2 Intervention Request of Parkland Fuel Corporation**

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We are counsel to Parkland Fuel Corporation ("Parkland") in respect of this proceeding.

On March 30, 2017, Parkland filed a request for intervenor status in Phase 2 of this proceeding, in which it outlined its directly affected constituencies in the Municipalities.

On April 6, 2017, EPCOR Southern Bruce Gas Inc. ("EPCOR") filed an objection to the Parkland request. In accordance with the Procedural Order No. 4, Parkland provides the following submissions in response to EPCOR's objection.

The Board has established a simple and straight forward test for Phase 2 Intervenor Standing: does the Party have a directly affected constituency in the Municipalities?

EPCOR does not challenge any of the specifics offered by Parkland in its request for Phase 2 intervenor standing. Rather, EPCOR simply asserts that Parkland does not represent constituents with directly affected interests in the Municipalities. This is clearly incorrect.

As an existing provider of energy services active throughout the Municipalities, Parkland is itself a party with a directly affected interest, and meets the Board's test for this reason alone.

Moreover, the 6,500 current customers throughout the Municipalities are a Parkland constituency whose obvious interests may be directly affected by the provision of natural gas service in the Municipalities, and also demonstrate why Parkland meets the Board's test.

While the issues for Phase 2 have yet to be determined, the Board's Draft Filing Requirements suggest that there is likely to be consideration of information and evidence of considerable interest to Parkland and its customers during Phase 2. One example concerns "tariffs and proposed rates", matters of obvious interest to both Parkland and its customers.

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EPCOR apparently takes no issue with the proposition that potential natural gas consumer interests such as those indicated with the request of CCC, SEC, Greenfield and BOMA meet the Board's test. As an existing provider of energy services, and for the reasons set out above, Parkland submits that its interests are equally directly affected, and that it is entitled to intervenor status in Phase 2 of this proceeding.

Yours very truly,

Gowling WLG (Canada) LLP

*<Original Signed By>*

James H. Smellie

JS:mc

cc: Britt Tan, EPCOR Utilities Inc.