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April 13, 2017

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

Dear Ms. Walli:

**Re: Union Gas Limited Application for Approval for Natural Gas Expansion
Board File No. EB-2015-0179**

EPCOR Southern Bruce Gas Inc. respectfully requests intervenor status in the above-noted proceeding. Should you have any questions, please do not hesitate to contact me.

Sincerely,

[Original signed by]

Britt Tan
Legal Counsel
btan@epcor.com
(780) 412-3998

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B., as amended;

AND IN THE MATTER OF the Ontario Energy Board Act, 1998, c.15, Schedule B, and in particular, s. 90 thereof;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders for approval of Union's Distribution System Expansion Project proposals;

AND IN THE MATTER OF an Application by Union Gas Limited ("**Union**") for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities required to serve the communities of Milverton, Prince Township and the Chippewas of Kettle and Stony Point and Lambton Shores.

**REQUEST FOR INTERVENOR STATUS OF
EPCOR SOUTHERN BRUCE GAS INC.**

1. EPCOR Southern Bruce Gas Inc. ("**EPCOR**") hereby applies for Intervenor Status in this proceeding pursuant to the above-captioned matter.
2. EPCOR is an Ontario corporation with its Registered Office in Toronto, Ontario. EPCOR is an indirect subsidiary of EPCOR Utilities Inc., an Alberta corporation with its head office in the City of Edmonton. EPCOR Utilities Inc. is an electricity, water and wastewater utility owned by its sole shareholder, the City of Edmonton. EPCOR owns over \$5 billion in utility assets in Alberta, British Columbia, Arizona, New Mexico and Texas.
3. As stated in the Board's decision in EB-2016-0004 and the Ontario Energy Board's (the "**Board**") letter to Union Gas Limited dated March 3, 2017, the Board intends to follow the decision of the generic community expansion in this proceeding and the Board expects to refine the mechanisms and features of the framework through the adjudication of the initial community expansion applications.

4. EPCOR was selected as the preferred proponent in a request for information conducted by the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss (collectively, the “**Municipalities**”) to bring natural gas service to those Municipalities. EPCOR is currently participating in a competitive process initiated by the Board to be the gas distributor for the Municipalities (the “**South Bruce Proceeding**”). This proceeding and the Board’s South Bruce Proceeding are the first natural gas expansion proceedings following the Board’s decision in EB-2016-0004. Accordingly, EPCOR has an interest in any generic or procedural issues that arise in this proceeding since they may create a precedent for, or otherwise affect, the South Bruce Proceeding.
5. EPCOR recognizes and supports the Board’s intention to limit interventions in both this proceeding, and the South Bruce Proceeding, to parties with direct interests. As noted above, EPCOR has a direct interest in any procedural or generic issues that arise in this proceeding. It does not have an interest in the substantive aspects of Union’s application. Consequently, EPCOR does not intend to actively participate in the proceeding. It is not EPCOR’s intent to file interrogatories or cross-examine witnesses, but EPCOR does wish to receive all materials in this proceeding, and make submissions should any party raise procedural or generic issues that would impact the South Bruce Proceeding.
6. EPCOR reserves the right to be heard in English, and to appear by or with counsel of its choice.
7. EPCOR requests that electronic copies of all documents filed or issued in connection with this proceeding, including the evidence and submissions of the Applicant and all intervenors, and any notices or correspondence, be forwarded to:

Bruce Brandell
Director, Commercial Services
EPCOR Commercial Services Inc.
2000 – 10423 101 Street NW
Edmonton, Alberta T5H 0E8
Telephone: (780) 412-3270
Fax: (780) 441-7118
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Britt Tan
Legal Counsel
EPCOR Utilities Inc.
2000 – 10423 101 Street NW
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Email: btan@epcor.com

8. EPCOR will not be seeking an award of costs.

Respectfully submitted on behalf of EPCOR Southern Bruce Gas Inc., this April 13th,
2017.

[Original signed by]

Britt Tan

Counsel for EPCOR Southern
Bruce Gas Inc.