



500 Consumers Road
North York, Ontario M2J
1P8
PO Box 650
Scarborough ON M1K 5E3

Bonnie Jean Adams
Regulatory Coordinator
phone: (416) 495-6409
fax: (416) 495-6072
Email: bonnie.adams@enbridge.com

March 9, 2011

VIA COURIER & E-MAIL

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

Dear Ms. Walli:

**Re: EB-2011-0013/14/15 Union Gas Limited ("Union")
Jacob Pool Storage Development Applications
Intervenor Request of Enbridge Gas Distribution**

Pursuant to the Ontario Energy Board's ("Board") Notice of Applications dated March 7, 2011, enclosed please find the Intervention of Enbridge Gas Distribution.

The request for Intervenor status has been submitted through the Board's Regulatory Electronic Submission System (RESS).

Please contact the undersigned if you have any questions.

Yours truly,

A handwritten signature in blue ink that reads "Bonnie Jean Adams".

Bonnie Jean Adams
Regulatory Coordinator

cc: Mr. Mark Murray, Manager, Regulatory Projects, Union Gas (via email)
Mr. Dan Jones, Counsel for Union Gas (via email)

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.1S, Schedule B; and in particular sections 90, 36.1(1), 38(1) and 40(1) thereof.

AND IN THE MATTER OF an Application by Union Gas Limited for a regulation designating the area known as the Jacob Pool, in the Municipality of Chatham-Kent, as a gas storage area;

AND IN THE MATTER OF an Application by Union Gas Limited for authority to inject gas into, store gas in and remove gas from the Jacob Pool, and to enter into and upon the lands in the said area and use the said lands for such purposes;

AND IN THE MATTER OF an Application by Union Gas Limited to the Ministry of Natural Resources for licences to drill wells in the said area;

AND IN THE MATTER OF an Application by Union Gas Limited for leave to construct a natural gas pipeline and ancillary facilities in the Municipality of Chatham-Kent

INTERVENTION OF ENBRIDGE GAS DISTRIBUTION INC.

1. Enbridge Gas Distribution Inc. ("Enbridge" or the "Company") hereby applies for intervenor status in this proceeding pursuant to the above-captioned matters.
2. Enbridge is a distributor and transmitter of natural gas in Ontario. The supply of natural gas is a vital concern to the Company and its customers.
3. Enbridge has a direct interest in all matters of jurisdiction, substance, and procedure in the regulation of public utilities, and in any decision of the Ontario Energy Board ("Board"), which may create a precedent affecting the Company's own applications.
4. Enbridge purchases certain storage and transportation services from Union Gas Limited ("Union") pursuant to rate schedules approved by the Board.

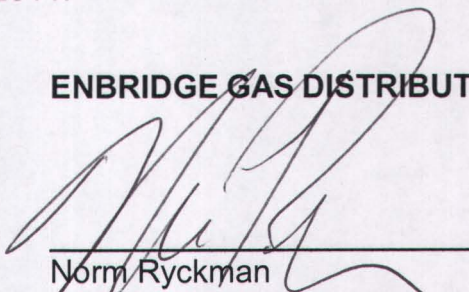
5. Enbridge reserves its right to fully participate as an intervenor in this proceeding and should the Board decide to proceed by way of an oral proceeding, Enbridge reserves the rights to appear by or with counsel of its choice, to cross-examine on all subject matters in this hearing that may relate to its interests, to adduce evidence on specific matters that are relevant to these proceedings, and to present argument.
6. Enbridge requests an electronic copy of the evidence and submissions of the Applicant and other intervenors, and any notices or correspondence to be forwarded to:

- | | | |
|-----|--------------------------------|---|
| (a) | Enbridge Gas Distribution Inc. | Bonnie Jean Adams
Regulatory Coordinator |
| | Address for personal service: | 500 Consumers Road
Toronto, ON M2J 1P8 |
| | Mailing Address: | P. O. Box 650
Scarborough, ON M1K 5E3 |
| | Telephone: | (416) 495-5499 |
| | Fax: | (416) 495-6072 |
| | E-Mail: | <u>EGDRegulatoryProceedings@enbridge.com</u> |
| | | |
| (b) | Enbridge Gas Distribution Inc. | Tania Persad
Senior Legal Counsel, Regulatory |
| | Address for personal service: | 500 Consumers Road
Toronto, ON M2J 1P8 |
| | Mailing Address: | P. O. Box 650
Scarborough, ON M1K 5E3 |
| | Telephone: | (416) 495-5891 |
| | Fax: | (416) 495-5994 |
| | E-Mail: | <u>Tania.Persad@enbridge.com</u> |

Enbridge will not be seeking an award of costs.

Dated at Toronto, Ontario, March 9, 2011.

ENBRIDGE GAS DISTRIBUTION INC.



Norm Ryckman
Director, Regulatory Affairs