

September 27, 2011

**Sent by E-mail and Courier**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

Your reference

Our reference



Barristers & Solicitors / Patent & Trade-mark Agents

Norton Rose OR LLP  
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On June 1, 2011, Ogilvy Renault joined Norton Rose Group.

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john.beauchamp@nortonrose.com

Dear Ms. Walli:

**Union Gas Limited 2012 Rates (EB-2011-0025)**

The Association of Power Producers of Ontario ("APPRO") respectfully requests intervenor status in the above-noted proceeding.

Please do not hesitate to contact me should you have any questions or concerns.

Yours very truly,

A handwritten signature in black ink, appearing to read "John Beauchamp", with a stylized flourish at the end.

John Beauchamp

JB/mnm

cc: C. Smith (Counsel for Union Gas Limited)  
D. Butters (APPRO)  
J. Wolnik (Elenchus Research Associates Inc.)

DOCSTOR: 2265926\1

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

**AND IN THE MATTER OF** an Application by Union Gas Limited for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of natural gas, effective January 1, 2012.

**NOTICE OF INTERVENTION OF  
ASSOCIATION OF POWER PRODUCERS OF ONTARIO  
("APPrO")**

**September 27, 2011**

**John Beauchamp**

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200 Bay Street

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1. APPrO hereby requests intervenor status in the above-noted proceeding.
2. APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO members produce power from natural gas, as well as hydro, gas, coal, nuclear, wind, waste wood and other sources.
3. On September 6, 2011, Union Gas Limited (“Union”) filed an Application (the “Application”), with the Ontario Energy Board (the “Board”) under section 36 of the *Ontario Energy Board Act, 1998*, S.O. c.15, Sched. B, as amended, for an order of the Board approving or fixing just and reasonable rates and other charges for the distribution, transmission and storage of natural gas, effective January 1, 2012.
4. Many of APPrO’s members are large volume customers of Union and will be affected by the bill impacts associated with Union’s proposals. As a result, APPrO’s members have a direct and significant interest in this proceeding.
5. Pursuant to s. 3.06 of the Board’s *Practice Direction on Cost Awards*, APPrO also intends to seek an award of costs from Union as a customer of the Applicant. In accordance with s. 3.03(a) of the Board’s *Practice Direction on Cost Awards*, APPrO represents the direct interests of consumers in relation to Union’s regulated services (APPrO’s members are among the largest consumers of Union’s services). APPrO has been held eligible for cost awards in past Union and Enbridge rates cases.
6. APPrO reserves the right to participate in all aspects of the proceeding and hereby requests that the Board, Union and any other intervenors provide it and its counsel with copies of all evidence and correspondence related to the proceeding, at the contact information below:

**APPrO**

25 Adelaide St. East  
Suite 1602  
Toronto, ON M5C 3A1

**Attention:** David Butters  
President  
**Telephone:** 416-322-6549, x231  
**Facsimile:** 416-481-5785  
**Email:** [david.butters@appro.org](mailto:david.butters@appro.org)

**AND**

**Norton Rose OR LLP**

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**Attention:** John Beauchamp  
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**Email:** [john.beauchamp@nortonrose.com](mailto:john.beauchamp@nortonrose.com)

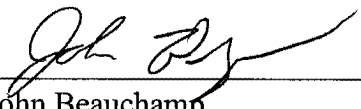
**AND**

**Elenchus Research Associates Inc.**

34 King Street East  
Toronto, ON, M5C 2X8

**Attention:** John Wolnik  
**Telephone:** 519-474-0844  
**Facsimile:** 416) 348-9930  
**E-mail:** [jwolnik@elenchus.ca](mailto:jwolnik@elenchus.ca)

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS  
27<sup>th</sup> day of September, 2011



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John Beauchamp  
Norton Rose OR LLP  
Counsel for APPrO