

March 14, 2013

Filed on RESS and Sent by Courier

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



Barristers & Solicitors / Patent & Trade-mark Agents

Norton Rose Canada LLP
Royal Bank Plaza, South Tower, Suite 3800
200 Bay Street, P.O. Box 84
Toronto, Ontario M5J 2Z4 CANADA

F: +1 416.216.3930
nortonrose.com

Your reference
EB-2012-0433

John Beauchamp
+1 416.216.1927
john.beauchamp@nortonrose.com

Our reference

Assistant
+1 416.216.1877
monique.massabki@nortonrose.com

Dear Ms. Walli:

Union Gas Limited – Leave to Construct (EB-2012-0433)

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,

Original signed by

John Beauchamp

JB/mnm

Enclosure

Cop(y/ies) to: Karen Hockin (Union Gas Limited)
Crawford Smith (Torys LLP)
David Butters (APPrO)
John Wolnik (Elenchus Research Associates Inc.)

DOCSTOR: 2656129\1

ONTARIO ENERGY BOARD

IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S. 36 thereof;

AND IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S.90.(1) thereof;

AND IN THE MATTER OF The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, S.91 thereof

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Parkway West site;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Town of Milton.

NOTICE OF INTERVENTION OF

ASSOCIATION OF POWER PRODUCERS OF ONTARIO (“APPro”)

March 14, 2013

John Beauchamp

Tel: 416-216-1927

Email: john.beauchamp@nortonrose.com

Facsimile: 416-216-3930

Norton Rose Canada LLP

Suite 3800

Royal Bank Plaza, South Tower

200 Bay Street

Toronto ON M5J 2Z4

1. APPrO hereby requests intervenor status in the above-noted proceeding.
2. Union Gas Limited ("Union") has filed an application with the Ontario Energy Board for an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Parkway West site and an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Town of Milton.
3. 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
4. As stated in the Notice of Application issued by the Board, the approximate cost of the proposed pipelines would be \$200 million. It will be the single largest project in Union's history, requiring a significant capital outlay without any new, incremental contractual commitments or revenues.
5. Union Gas says that the proposed project will provide greater reliability of supply and allow for more gas to flow through the Parkway Compressor Station. It will affect Union's transportation and wholesale customers with respect to quality of service and security of supply.
6. Many of APPrO's members are large M12 shippers and will be affected by the potentially large bill impacts associated with these proposals. As a result, APPrO's members have a direct and significant interest in this proceeding.
7. Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, APPrO 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.
8. APPrO has a record of participating in Board proceedings in a responsible and efficient manner and has been held eligible for cost awards in other proceedings including: Union and Enbridge rates cases; and several natural gas proceedings that had unique impacts on power generators (i.e., NGEIR, storage allocation, etc.) APPrO believes it is appropriate for the Board to do so again in the context of this proceeding
9. 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, its counsel and its consultant 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

AND

Norton Rose Canada LLP
Suite 3800
Royal Bank Plaza, South Tower
200 Bay Street
Toronto, ON M5J 2Z4

Attention: John Beauchamp
Telephone: 416-216-1927
Facsimile: 416-216-3930
Email: 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

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
14th day of March, 2013

Original signed by

John Beauchamp
Norton Rose Canada LLP
Counsel for APPrO