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Delivered by Email and Courier

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319, Suite 2700
Toronto, ON M4P 1E4
Fax: (416) 440-7656
Email: boardsec@ontarioenergyboard.ca

Dear Ms. Walli:

**Re: EB-2014-0295 – Suncor Energy Products Inc. - Application for an Order under s. 41(9) of the
*Electricity Act, 1998***

We are the solicitors for the Town of Plympton-Wyoming (the “Town”). Please accept this letter as the Town’s Application for Intervenor Status in the above noted Application by Suncor Energy Products Inc. (the “Application”). For the purpose of service of any and all future documents, please use the address below to the attention of Graham Andrews, whose email address is gandrews@gillespielaw.ca.

The Town is a lower-tier municipality, as defined in the *Municipal Act, 2001*, and as such is represented by a democratically elected Council with authority over and responsibility for the care and maintenance of roads and bridges within its jurisdiction.

The Application is of great interest to the Town as its rights will be directly affected should the requested order be granted. The Application specifically contemplates the construction and operation of a distribution facility in 22.615 km of the road allowances owned and maintained by the Town, as noted in the Application.

The Town takes the position that the Application is premature as discussions have been ongoing between the Town and Suncor Energy Products Inc. for some time and have not yet concluded with respect to the issues raised in the Application. Currently, the Town is awaiting further information from Suncor Energy Products Inc. following from the most recent meeting of their respective representatives.

The Town and its residents have an interest in determining the extent of any possible impact the proposed construction and operation would have on its road allowances, including current and future maintenance, and possible injury to municipal employees as well as ensuring that the proposed construction, if it is allowed to proceed, will meet all applicable construction requirements and standards.

The Town intends to actively participate in the hearing of this Application and strongly urges the Board to order that the hearing be conducted orally in order to allow the Town and other parties to present their evidence, cross-examine the relevant witnesses *viva voce*, and submit legal argument.

Yours truly,

ERIC K. GILLESPIE
PROFESSIONAL CORPORATION



Eric K. Gillespie
EKG/ga

cc Mr. Albert Engel, Counsel for Suncor Energy Products Inc.
Mr. Kyle Pratt, Chief Administrative Officer, Town