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August 7, 2015

Patrick G. Welsh
Direct Dial: 416.862.5951
PWelsh@osler.com
Our Matter Number: 1144688

Sent By Registered Mail and Electronic Mail and filed on RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**EB-2015-0205: Franchise Renewal Application with Township of Malahide by
Natural Resource Gas Limited (“NRG”)**

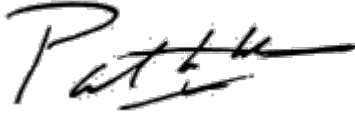
On July 27, 2015, counsel for NRG received a Letter of Comment from Union Gas Limited (“Union”) regarding NRG’s Application to renew its franchise agreement with the Township of Malahide (“Malahide”) in the above proceeding. In its Letter, Union requested that the Ontario Energy Board (the “Board”) direct NRG to identify specifically where they have assets on County of Elgin roads so that their related E.B.C. 212 Certificate can be limited in this regard.

While NRG is appreciative of Union’s comments, NRG respectfully submits that Union’s request is beyond the scope of the current proceeding. The matter before the Board is the renewal of NRG’s franchise agreement with Malahide. Union’s Letter specifically acknowledges that it “does not have a concern with respect to the Malahide franchise agreement.”

Union’s concern appears to be related to issues of potentially “overlapping” Certificates of Public Convenience and Necessity (“CPCNs”), namely NRG’s CPCN E.B.C. 212 and Union’s CPCN F.B.C. 259. Union attempted to raise similar concerns during NRG’s Franchise Renewal Application with Norfolk County (EB-2014-0207), where, in a letter of comment dated June 30, 2014, Union expressed concerns about potentially overlapping CPCN rights stemming from historic CPCNs in the Norfolk County area. NRG objected to Union’s suggestion of issuing new CPCNs and the Board agreed with NRG, stating that NRG’s “existing certificate remains valid and that this issue is beyond the scope of NRG’s application.”

NRG respectfully requests that the Board proceed to evaluate NRG’s Franchise Renewal Application without unnecessarily expanding the scope of issues before the Board.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Patrick G. Welsh', with a stylized flourish at the end.

Patrick G. Welsh
Associate

PW:LS

c: Richard King, *Osler, Hoskin & Harcourt LLP*
Laurie O'Meara, *NRG*
Patrick McMahon, *Union Gas Limited*