

August 11, 2015

COURIER, EMAIL AND RESS

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

Dear Ms. Walli:

**Re: EB-2014-0182 – Union Gas Limited (“Union”)
Burlington Oakville Pipeline Project**

We are legal counsel to Union Gas Limited ("Union"). This letter is in response to the letter filed on August 7, 2015 on behalf of the Federation of Rental Housing Providers of Ontario ("FRPO") requesting intervenor status in this proceeding.

Union has serious concerns regarding FRPO's intervention request. Mr. Quinn's request for intervenor status on behalf of FRPO shows a disregard for the regulatory process. Further, it demonstrates the need for more rigour around the intervenor process, in general. Mr. Quinn, along with other intervenors, was made aware of the Burlington Oakville Pipeline Project well in advance of Union filing its request for leave to construct. Union filed the application on December 12, 2014 and Mr. Quinn, in fact, intervened on behalf of the Ontario Greenhouse and Vegetable Growers Association ("OGVG") on March 10, 2015 (also a late intervention). In Union's view, Mr. Quinn's request for late intervenor status on behalf of FRPO at this point in the process is inappropriate.

Further, Union notes that the London Property Management Association ("LPMA") filed its letter of intervention on January 2, 2015. Both organizations represent the rental market in Union's franchise area. Both organizations have sought intervenor status on the basis of the interests of the underlying customers they represent. While the LPMA and FRPO are two separate organizations, clearly they both represent identical interests: property managers and owners/operators of residential rental properties. As a result, Union requests that, if FRPO is accepted as an intervenor, as a condition of FRPO's participation in this proceeding FRPO should be required to cooperate with LPMA to the fullest extent possible.

Union also notes that if Mr. Quinn's request is accepted he will jointly be representing both the OGVG and FPRO. In the current proceeding the primary issue is related to Union's request for leave to construct to satisfy the need identified by Union. In this regard there is not a specific issue that is unique to OGVG or FPRO and as such Mr. Quinn should be required as a condition of FPRO's participation to allocate costs between FPRO and OGVG and to share costs accordingly. Furthermore, Mr. Quinn should not be permitted to split his representation of OGVG and FPRO in such manner as to provide a procedural advantage in requesting responses to interrogatories, completing cross-examination (in the event of an oral hearing) or making submissions.

Yours truly,



Charles Keizer
CK/

cc (by email): Zora Crnojacki, Board Staff
Mark Kitchen, Union
All Intervenors (EB-2014-0182)