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September 28, 2015

**Delivered by Email**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2701  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited Application to Expand Natural Gas Services  
OEB File No.: EB-2015-0179  
Our Clients: Municipality of Kincardine, Municipality of Arran-Elderslie  
and the Township of Huron-Kinloss**

We are counsel to the Municipality of Kincardine (“Kincardine”), the Municipality of Arran-Elderslie (“AE”) and the Township of Huron-Kinloss (“HK” and collectively “the Municipalities” or “South Bruce”). Our clients herein apply for intervenor status in the above noted proceeding.

Kincardine, AE and HK are three communities in Bruce County, Ontario without access to natural gas service<sup>1</sup>. In October 2014, the Municipalities publically released their business case report concerning the technical and economic feasibility of certain options to expand natural gas services to these communities. This business case report can be obtained from Kincardine’s website at [www.kincardine.net/natural.cfm](http://www.kincardine.net/natural.cfm).

The Municipalities business case report highlighted, among other things, the need for regulatory flexibility and change with respect to natural gas rate making mechanisms to facilitate gas expansions to unserved or underserved areas. This past spring the Municipalities undertook a competitive Request for Information process to canvas the marketplace in search of potential natural gas distributors who may be interested in undertaking a natural gas expansion initiative in South Bruce. On September 22, 2015 the Municipalities announced that EPCOR Utilities Ltd. (“EPCOR”) had been selected as their preferred proponent to undertake the expansion of natural gas to these communities. It is anticipated that the Municipalities and EPCOR will make applications to the Board for Municipal Franchise Agreement, Leave to Construct, and Certificate of Public Necessity approvals as early as spring, 2016.

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<sup>1</sup> Except for a small portion of Arran-Elderslie.

The Municipalities submit they will be directly impacted by the Board decisions arising from Union's application since any new or revised rate making mechanisms may also apply to the Municipalities and EPCOR in their collective goal to expand natural gas into South Bruce.

Would you please provide copies of all correspondence related to this proceeding to the following:

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Thank you for your assistance in this matter.

Yours truly,

**BORDEN LADNER GERVAIS LLP**



J. Mark Rodger  
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JMR/ld

Copy to: Mayor Ann Eadie, Kincardine  
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Mayor Paul Eagelson, Arran-Elderslie  
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Mr. John Todd, Econanalysis  
Mr. David Simpson, Union Gas

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