



**uniongas**

A Spectra Energy Company

February 28, 2017

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

Dear Ms. Walli:

**Re: Natural Resource Gas Sale to EPCOR Natural Gas Limited Partnership  
Board File No. EB-2016-0351**

Union Gas Limited respectfully requests intervenor status in the above-noted proceeding. Should you have any questions, please do not hesitate to contact me.

Yours truly,

*[Original signed by]*

Patrick McMahon  
Manager, Regulatory Research and Records  
[pmcmahon@uniongas.com](mailto:pmcmahon@uniongas.com)  
(519) 436-5325

Encl.

c.c. (email only): Brian Lippold, NRG  
Bruce Brandell, EPCOR Utilities Inc.  
Britt Tan, EPCOR Utilities Inc.  
Sander Duncanson, Osler, Hoskin & Harcourt LLP

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B., as amended;

**AND IN THE MATTER OF** the application by Natural Resource Gas for an order or orders granting leave under section 43 of the *Ontario Energy Board Act* allowing NRG to transfer its natural gas distribution system in its entirety to EPCOR Natural Gas Limited Partnership;

**AND IN THE MATTER OF** the application by Natural Resource Gas for an order or orders granting leave under section 18 of the *Ontario Energy Board Act* to NRG to transfer to EPCOR Natural Gas Limited Partnership the relevant regulatory agreements, certificates and orders for NRG's distribution system, including all existing franchise agreements, Certificates of Public Convenience and Necessity, and rate orders / schedules.

**REQUEST FOR INTERVENOR STATUS  
OF  
UNION GAS LIMITED**

1. Union Gas Limited ("Union") hereby applies for Intervenor Status in this proceeding pursuant to the above-captioned matter.
2. Union is an Ontario Corporation with its Registered Office at the Municipality of Chatham-Kent, in the Province of Ontario. Union is a regulated public utility which combines the operations of selling, distributing, transmitting and storing natural gas within the meaning of the *Ontario Energy Board Act*.
3. Natural Resource Gas ("NRG") is a customer of Union and holds a number of contracts with Union for the transportation, delivery and sale of natural gas to NRG's system.
4. Union has a direct interest in all matters of jurisdiction, substance and procedure in the regulation of public utilities, and in any decision of this Board, which may create a precedent affecting Union's operations and/or rates.
5. Union requests one copy of the submissions of the participants in this proceeding, and any notices or correspondence. This includes any revisions or amendments, which may be made prior to the commencement of or during the hearing of this issue. Union's preference is to receive searchable electronic versions of filings in this proceeding.

6. At this time, it is Union's intention to monitor the proceeding; however, after reviewing the submissions, Union may wish to address one or more of the issues.
7. Union reserves the right to adduce evidence, submit interrogatories, cross-examine witnesses, advance argument and participate in the hearing as circumstances may require.
8. Communications relating to this intervention should be directed to:  

Patrick McMahon  
Manager, Regulatory Research and Records  
Union Gas Limited  
50 Keil Drive North, Chatham, Ontario N7M 5M1  
Telephone: (519) 436-5325  
Email: [pmcmahon@uniongas.com](mailto:pmcmahon@uniongas.com)
9. Union will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 28<sup>th</sup> day of February, 2017.

UNION GAS LIMITED

*[Original signed by]*

Per: \_\_\_\_\_  
Patrick McMahon  
Manager, Regulatory Research and Records