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Reply To: Thomas Brett
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Our File No. 171236

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli
Board Secretary

Dear Ms. Walli:

Re: Intervenor Status and Cost Eligibility Request on behalf of the Building Owners and Managers Association, Greater Toronto for EB-2016-0137/0138/0139: EPCOR Southern Bruce Gas Inc., Applications for approval of Franchise Agreements and Certificates of Public Convenience and Necessity for Municipality of Arran-Elderslie, Municipality of Kincardine and Township of Huron-Kinloss (Intervenor Status in Phase 2 and Cost Eligibility Request for Phases 1 and 2)

The Building Owners and Managers Association, Greater Toronto (BOMA) seeks intervenor status and cost award eligibility in Phases 1 and 2 of the above noted proceeding. BOMA's members own commercial rental properties in the geographic areas the two applicants seek to serve, in particular, in Kincardine. In addition, potential introduction into Ontario of another substantial utility raises an important public interest issue, especially in light of the recent consolidation under common ownership of Enbridge and Union Gas. The decision in this proceeding will likely set a precedent for other new entrants.

BOMA has participated in many recent natural gas rates and facilities in Ontario, including EB-2016-0004, which considered issues relevant to this proceeding, and has been found eligible to be paid its reasonably incurred costs in all of these proceedings.

BOMA represents over 800 Ontario Property and Facility Owners, Managers, Developers, Leasing Agents, and Commercial Real Estate Professionals. Its members account for eighty per cent of all commercial and industrial real estate companies in the Greater Toronto Area and throughout Ontario. BOMA's members, collectively, are large consumers of natural gas throughout Ontario, and have a substantial interest in reliable and cost-effective gas delivery service.

Over the years, BOMA has been active in protecting and advancing the interests of its members on such important policy issues as energy pricing and supply, property taxes, labour requirements, building materials and equipment regulations. BOMA continues to work at all levels of government providing a voice for commercial property owners in the Greater Toronto Area and throughout Ontario. As noted above, BOMA was an active participant in the recent natural gas expansion proceeding, to which this application is a corollary, given both its particular and generic aspects.

As a representative of a large sector of energy consumers throughout Ontario, including the municipalities in which the applicants wish to provide gas service, BOMA seeks a cost award in this proceeding.

BOMA plans to participate actively in this proceeding, to submit interrogatories, cross-examine witnesses and submit argument.

BOMA requests that further communications with respect to this matter be sent to the following parties:

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BOMA respectfully requests your acceptance of this intervention and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett

TB/dd

- cc: Azalyn Manzano, OEB *(by email)*
 Michael Millar, OEB *(by email)*
 Bruce Brandell, EPCOR *(by email)*
 Marion Fraser, Fraser & Company *(by email)*
 Bala Gnanam, BOMA *(by e-mail)*