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April 10, 2017

VIA RESS AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Board File Nos.: EB-2016-0137 / EB-2016-0138 / EB-2016-0139
South Bruce Expansion Applications – Applications to serve the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss with natural gas distribution services**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-mentioned proceeding (the **Proceeding**). In a letter dated April 6, 2017, EPCOR Southern Bruce Gas Inc. (**EPCOR**) objected to Anwaatin's request for intervenor status in Phase 2 of the Proceeding on the allegation that Anwaatin does "not represent constituents with directly affected interests in the Municipalities". We write pursuant to Procedural Order No. 4 dated April 7, 2017 to clarify that, contrary to EPCOR's false allegation, Anwaatin does, in fact, represent constituents with directly affected interests in the Municipalities.

Anwaatin informed the Board and all parties to this Proceeding of its Indigenous members for this Proceeding by letter dated March 16, 2017. Anwaatin clearly indicated that the Saugeen Ojibway Nation (**SON**) is a First Nation participating as a member of Anwaatin for this Proceeding and explained that SON consists of Saugeen Ojibway First Nation and Chippewas of Nawash Unceded First Nation, whose traditional territory includes the Municipality of Kincardine and the Township of Huron-Kinloss. Anwaatin further indicated that SON members will be directly affected natural gas customers in the proposed South Bruce natural gas franchise area (the **Area**).

We understand that EPCOR is not an active gas market participant in Ontario, and therefore does not appear to comprehend that the local community affected by EPCOR's South Bruce expansion applications includes SON members who will be natural gas customers in the Area. EPCOR appears to have no knowledge or understanding of, and continues to be reticent to consult with, directly affected First Nations and Indigenous stakeholders and appears to be

attempting to limit First Nations' and Indigenous stakeholders' participation in this Proceeding by objecting to Anwaatin's request for intervenor status.

The outcomes of this Proceeding will have a direct impact on SON's constitutionally protected rights and social and economic interests. If EPCOR's application is approved by the Board, it will result in infrastructure installation, operation and decommissioning that may impact the environmental resources that sustain SON communities and the Indigenous archeological and cultural heritage resources that have deep spiritual and historical importance to SON communities.

We ask that the Board set aside EPCOR's objection to Anwaatin's intervention in Phase 2 of the Proceeding and grant Anwaatin's request for intervenor status and cost eligibility, as requested in our letter of March 30, 2017.

Yours very truly,

A handwritten signature in black ink, appearing to be 'Lisa (Elisabeth) DeMarco', with a long horizontal flourish extending to the right.

Lisa (Elisabeth) DeMarco