

April 13, 2017

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re:EB-2015-0179 – Application by Union Gas Limited to Serve the Communities of Milverton, Prince Township and the Chippewas of Kettle and Stony Point and Lambton Shores

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy board (“OEB”) by Union Gas Limited (“Union”) to provide natural gas service to the communities of Milverton, Prince Township and the Chippewas of Kettle and Stony Point and Lambton Shores. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The OEB’s order in this proceeding will ultimately impact the rates that residential consumers pay for the delivery of natural gas.

Union’s original application was filed on July 23, 2015. On January 20, 2016, the OEB indicated that it would hold a generic proceeding to consider a set of issues common to all gas distributors and new entrants seeking to provide gas distribution services to new communities. On November 17, 2016, the OEB issued its Decision on the Generic Community Expansion Proceeding (EB-2016-0004). On March 31, 2017, Union filed updated its evidence to comply with the OEB’s findings in its EB-2016-0004 Decision. The Council is requesting intervenor status in this proceeding primarily to assess whether Union’s proposals are consistent with the OEB’s EB-2016-0004 Decision. The OEB indicated in that Decision that it expected to refine the mechanisms and features of its expansion framework through the adjudication of the initial applications and would be seeking submissions from parties on the key issues in those proceedings. This is the first proceeding in which the new framework will be applied.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test the evidence and the impacts of Union’s proposals on the customers in the relevant communities and Union’s existing customers;
2. To assess how the Application should be considered in the context of the Ontario Energy Board’s framework for natural gas expansion as determined in the EB-2016-0004 proceeding; and
3. To participate in the various stages of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and an oral hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many Ontario natural gas applications over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

On October 17, 2016, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board's Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

Copies of all Board Notices, all correspondence and hard copies of the Applicant's evidence should be sent to:

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Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: M. Buonaguro, Counsel
Union Gas, Regulatory Affairs