

Toronto

July 25, 2017

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Calgary

Ottawa

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

Vancouver

New York

Dear Ms. Walli:

**Request for Intervenor Status - Natural Resource Gas Limited
re Application by Union Gas Limited related to certain Certificates of Public
Convenience and Necessity (EB-2017-0108)**

We are counsel to Natural Resource Gas Limited (“**NRG**”). NRG is an Ontario corporation and carries on the business of, among other things, owning and operating natural gas distribution facilities in south-western Ontario, including in the County of Norfolk, the County of Elgin, and the County of Middlesex.

In accordance with the Ontario Energy Board’s (the “**Board**”) Notice, received July 19, 2017, and Rule 22 of the Board’s *Rules of Practice and Procedure*, NRG seeks intervenor status in the above proceeding. As described more fully below, NRG has a substantial interest in the above proceeding and intends to participate actively and responsibly in the proceeding, including, as necessary, submitting evidence, argument or interrogatories, or by cross-examining witnesses and affiants.

NRG’s Interest in the Proceeding and Grounds for Intervention

The above application by Union Gas Limited (“**Union**”) directly and indirectly impacts NRG’s rights and interests. Specifically, Union has requested, among other things, that the Board amend two of NRG’s Certificates of Public Convenience and Necessity (“**CPCNs**”) without NRG’s support or consent, which directly impacts NRG’s rights and interests. Further, Union has requested, among other things, that the Board amend or reissue CPCNs in areas where NRG also owns and operates natural gas distribution facilities. NRG is concerned that Union’s application and/or the Board’s findings thereto may negatively impact NRG’s rights and interests, either directly or indirectly.

Statement of the Nature and Scope of NRG's Intended Participation

NRG intends to, and reserves its rights to, submit evidence, argument or interrogatories, cross-examine witnesses, and otherwise participate in the hearing as necessary, and will provide the Board with argument and reasons why Union's application should be dismissed in its entirety or, in the alternative, substantially circumscribed.

Should the relief in NRG's application in EB-2016-0351 (i.e., its MAAD application) be granted and following the closing of NRG's sale of its natural gas distribution facilities to EPCOR Natural Gas Limited Partnership ("EPCOR"), and subject to any guidance or direction from the Board, NRG will transfer or otherwise work with EPCOR to transition NRG's evidence, argument, interrogatories, cross-examinations or any other participation in this proceeding to EPCOR.

NRG requests one copy of the evidence and submissions of Union and any submissions of any other participants, commenters or intervenors. NRG's preference is to receive electronic copies of any such documents.

Costs

NRG will not be seeking an award of costs.

Contact Information

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Please do not hesitate to contact me if you have any questions.

Yours very truly,



Patrick G. Welsh
Associate

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