

October 2, 2018

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

Dear Ms. Walli:

Re: EPCOR Southern Bruce Gas Inc.

Application to Transfer Certificates of Public Convenience and Necessity OFR File No. FR 2018 0247

OEB File No. EB-2018-0247

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 Supervisor, Regulatory Research and Records pmcmahon@uniongas.com (519) 436-5325

Encl.

c.c. (email only): Bruce Brandell, EPCOR Utilities Inc.

Brit Tan, EPCOR Utilities Inc.

Patrick Welsh, Osler, Hoskin & Harcourt LLP Richard King, Osler, Hoskin & Harcourt LLP

ONTARIO ENERGY BOARD

IN THE MATTER OF Section 18 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B) and Section 8 of the *Municipal Franchises Act*, R.S.O. 1990, c. M.55;

AND IN THE MATTER OF an application by EPCOR Utilities Inc., EPCOR Southern Bruce Gas Inc., and EPCOR Natural Gas Limited Partnership for an Order pursuant to Section 18(1) of the *Ontario Energy Board Act, 1998* granting leave to transfer the Certificates of Public Convenience and Necessity for the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss to EPCOR Natural Gas Limited Partnership.

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*, 1998.
- 3. Union currently holds Franchise Agreements and Certificates of Public Convenience and Necessity allowing it to provide gas services within the Municipality of Arran-Elderslie.
- 4. EPCOR Natural Gas Limited Partnership ("EPCOR") is a customer of Union and holds several contracts with Union for the transportation, delivery and sale of natural gas to EPCOR's system.
- 5. 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.
- 6. Union requests one copy of the evidence and submissions of the Applicant and other participants, 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 Application. Union's preference is to receive searchable electronic versions of filings in this proceeding.

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

Patrick McMahon Supervisor, Regulatory Research and Records Union Gas Limited 50 Keil Drive North Chatham, Ontario N7M 5M1

Telephone: (519) 436-5325

Email: pmcmahon@uniongas.com

10. Union will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 2nd day of October, 2018.

UNION GAS LIMITED

	[Original signed by]
Per:	
	Patrick McMahon
	Supervisor, Regulatory Research and Records