

October 22, 2018

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

Dear Ms. Walli:

**Re: Certificates of Public Convenience and Necessity
Norfolk County, County of Elgin and County of Middlesex
Ontario Energy Board File No. EB-2017-0108**

We write to provide an update on the progress being made on the maps and service area descriptions that the Ontario Energy Board has requested pursuant to its Decision and Order dated October 11, 2018 and to request that the deadline to submit this material be extended until December 7, 2018.

In its Decision and Order, the Board granted a new Certificate of Public Convenience and Necessity to each of Union Gas and EPCOR for the single tier Norfolk County, limited to the areas covered by the previous certificates in Norfolk County. As there is no gas distribution service in the area where both Union Gas' and EPCOR's certificates for Norfolk County currently overlap (Lot 1 in Concessions 9, 10, 11 and 12), this area will be excluded from the new certificates. Areas that are currently not covered by a certificate will remain without a certificate at this time; however, Union Gas has been granted the areas in Norfolk County where it currently has infrastructure to bring it into compliance (i.e., the north half of Lots 3 and 5 in Concession 7, and all of Lots 4 and 5 in Concession 8).

The Board directed Union to submit a draft order for a Certificate for Norfolk County as well as a customer density map with boundaries delineating each area of authorization by November 1, 2018. This requires the generation of two maps showing: (1) the location of Union's facilities in a form to allow for the development of the metes and bounds descriptions; and (2) customer density for facilities / customers within Norfolk County.

The Decision and Order directed Union to submit draft Certificates for each of the lower-tier municipalities in the County of Middlesex where we have infrastructure, complete with the metes and bounds information in lots and concessions, and customer density maps. Given that the County of Middlesex is comprised of 8 municipalities for which Union currently holds Certificates, this requires the generation of two maps for each of these municipalities (16 in total) showing: (1) the location of Union's facilities in a form to allow for the development of the metes and bounds descriptions; and (2) customer density for facilities / customers within each of the municipalities.

The Decision and Order also directed Union to submit draft Certificates for each of the lower-tier municipalities in the County of Elgin where we have infrastructure, complete with the metes and bounds information in lots and concessions, and the customer density maps. Given that the County of Elgin currently includes 5 municipalities for which Union currently holds Certificates and the Township of Malahide for which Union now requires a Certificate, this requires the generation of two maps for each of these municipalities (12 in total) showing: (1) the location of Union's facilities in a form to allow for the development of the metes and bounds descriptions; and (2) customer density for facilities / customers within each of the municipalities.

The requirement for maps requires that existing Certificates for each municipality be reviewed to verify boundaries and then each facility and customer density map will need to be created, along with metes and bounds descriptions, and verified by field staff.

In light of the above requirements and the time it takes for each map and description to be generated and verified, Union respectfully requests an extension to December 7, 2018 to the deadline to submit the requested draft Certificates and related maps and descriptions.

This extension will also require an extension to the date for parties to make written submissions on the draft orders (which we suggest be delayed until December 21, 2018) and to the date for reply submissions (which we suggest be delayed until January 11, 2019).

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): Azalyn Manzano, Ontario Energy Board
 Ritchie Murray, Ontario Energy Board
 Richard Lanni, Ontario Energy Board
 Bruce Brandell, EPCOR Utilities Inc.
 Britt Tan, EPCOR Utilities Inc.
 Patrick Welsh, Osler Hoskin & Harcourt LLP (EPCOR)
 Scott Lewis, OM Limited Partnership
 Myriam Seers, Torys