

October 30, 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
Ontario Energy Board File No. EB-2018-0247**

Union Gas Limited (“Union”) is writing to request that the deadline to file submissions in this proceeding be extended to allow for more evidence to be put on the record and to allow for adequate process for the review of this application by the Ontario Energy Board (“Board”).

Pursuant to Procedural Order No. 1 to the above noted proceeding, Union was directed to file its submissions with respect to the application and evidence of EPCOR Southern Bruce Gas by October 31, 2018. After reviewing the evidence currently on the record, Union requests that a revised procedural schedule be established to allow for an interrogatory process to be initiated to allow more details to be put on the record on various issues including:

- the legal jurisdiction under which EPCOR believes that the OEB can transfer Certificates of Public Convenience and Necessity from one utility to another;
- other Certificates that will be required in order to provide service to the Southern Bruce municipalities;
- whether there has or will be a transfer of assets and franchise agreements between the utilities and the related process; and
- the potential impact on Union of the services that EPCOR is seeking in order to provide gas distribution services to the Southern Bruce municipalities.

Union believes that it would not be appropriate to prepare final submissions until additional information on these issues is provided in response to interrogatories.

Given that the OEB’s granting of Certificates to EPCOR Southern Bruce Gas for each of the Municipality of Arran-Elderslie (except for the geographic area of the former Township of Arran and the former Village of Tara), the Municipality of Kincardine and the Township of Huron-Kinloss was conditional on the approval of its subsequent leave to construct (“LTC”) application, it is not clear how conditional Certificates that are based on a condition that has not yet been met can be changed in any way.

Union is aware of a LTC and rates application (EB-2018-0263) submitted by EPCOR Southern Bruce Gas with respect to providing service to the Southern Bruce municipalities. However, having not seen the application, Union is not aware of any details surrounding franchise agreements and Certificates related to other municipalities through which EPCOR Southern Bruce Gas is expected to install assets to service the Southern Bruce municipalities (i.e., Township of Chatsworth, Municipality of West Grey, Municipality of Brockton, the County of Bruce and the County of Grey) nor information related to updated franchise agreements that have been negotiated with the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss.

Union requests that a revised procedural schedule be established to allow for the interrogatory process to be dealt with quickly (e.g., interrogatories submitted by November 6, responses to interrogatories submitted by November 16) which would allow for final submissions to be made by November 30, 2018.

Given that EPCOR's LTC and rates application has not yet been addressed by the Board, additional process steps will not delay the proposed Southern Bruce project and will allow for better informed and more complete submissions to be provided to the Board for its consideration prior to issuing a decision on the application to transfer Certificates.

Should you have any questions on this request, please do not hesitate to contact me.

Yours truly,

[Original signed by]

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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
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