Osler, Hoskin & Harcourt LLP Box 50, 1 First Canadian Place Toronto, Ontario, Canada M5X 1B8 416.362.2111 MAIN 416.862.6666 FACSIMILE



Toronto	March 27, 2019	Patrick G. Welsh Direct Dial: 416.862.5951
Montréal		PWelsh@osler.com
Calgary	Sent By Electronic Mail and Overnight Courier and Filed Electronically on RESS	
Ottawa	Ms. Kirsten Walli Board Secretary	
Vancouver	Ontario Energy Board	
New York	2300 Yonge Street 27th Floor, P.O. Box 2319 Toronto, ON M4P 1E4 (<u>boardsec@ontarioenergyboard.ca</u>)	

Dear Ms. Walli:

Intervenor Request Letter of EPCOR Natural Gas Limited Partnership

Re EB-2018-0305: Application by Enbridge Gas Inc. for 2019 natural gas rates and other charges effective January 1, 2019

We are counsel to EPCOR Natural Gas Limited Partnership ("EPCOR"). EPCOR seeks intervenor status in the above proceeding. EPCOR is a distributor of natural gas in Ontario and is a customer of Enbridge Gas Inc. ("Enbridge").

In reviewing Enbridge's application in the above proceeding, EPCOR observed that part of the application contemplates changes related to Enbridge's Economic Feasibility Procedure and Policy for both system expansion and community expansion projects. Any changes to this policy may have an impact on EPCOR, particularly on EPCOR's expansion into Southern Bruce, which is the subject of a number of proceedings before the Ontario Energy Board (the "**OEB**").

While EPCOR reserves its rights to participate actively and responsibly in the above proceeding by submitting evidence, argument, or interrogatories, or by cross-examining witnesses, on all matters at issue in Enbridge's application, EPCOR's primary focus as an intervenor is on Enbridge's proposed changes to its Economic Feasibility Procedure and Policy and the potential implications on EPCOR thereto. EPCOR understands that, at present, Enbridge's proposed policy changes are not on the Issues List. In the interests of time, EPCOR proposes the following issue be added to the Issues List (EPCOR would be pleased to re-submit such request upon acceptance by the OEB of EPCOR's request for intervenor status):

Are Enbridge's proposed changes to its Economic Feasibility Procedure and Policy Appropriate? In particular, is Enbridge's proposed connection policy appropriate and if so, should there be any limitations as to what facilities are

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considered, and how the market is determined for purposes of computing the net present value of the project and which customer(s) should be responsible for any CIAC?

Subject to further direction from the OEB, EPCOR will be in a position to submit written interrogatories by the date prescribed in Procedural Order No. 1 dated February 22, 2019 (i.e., by April 3, 2019).

Recognizing that this is a late intervenor request, EPCOR is willing to accept the record to-date (subject to any evidence requested in or related to any interrogatories filed in accordance with Procedural Order No. 1). Further, EPCOR will not seek its costs in this proceeding.

EPCOR requests electronic copies of all evidence and correspondence related to the Application.

Contact Information

Dana Bissoondatt Associate General Counsel EPCOR Utilities Inc. 2000 – 10423 101 St. NW Edmonton, AB T5H 0E8 DBissoondatt@epcor.com

With a copy to its counsel:

Patrick G. Welsh Osler, Hoskin & Harcourt LLP 1 First Canadian Place, Suite 6300 Toronto, ON M5X 1B8 <u>pwelsh@osler.com</u> Tel: 416-862-5951 Fax: 416-862-6666 Bruce Brandell Director, Commercial Services EPCOR Utilities Inc. 2000 – 10423 101 St. NW Edmonton, AB T5H 0E8 BBrandell@epcor.com

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

Yours very truly.

Patrick G. Welsh

c (email only): Richard King, Osler, Hoskin & Harcourt LLP Bruce Brandell/Dana Bissoondatt, EPCOR