



April 8, 2019

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

Dear Ms. Walli:

Re: EPCOR Natural Gas Limited Partnership Southern Bruce Leave-to-Construct Application Ontario Energy Board File No. EB-2018-0263

Enbridge Gas Inc. 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 Specialist, Regulatory Research and Records pmcmahon@uniongas.com (519) 436-5325

Encl.

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

Richard King, Osler, Hoskin & Harcourt LLP Dana Bissoondatt, EPCOR Utilities Inc.

## ONTARIO ENERGY BOARD

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

**AND IN THE MATTER OF** an application by EPCOR Natural Gas Limited Partnership under section 90 of the *Ontario Energy Board Act* for an order or orders granting leave to construct natural gas distribution pipelines and ancillary facilities to serve the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss;

AND IN THE MATTER OF an application by EPCOR Natural Gas Limited Partnership for orders approving the terms and conditions upon which, and the period for which, the Corporation of the County of Bruce, the Corporation of the County of Grey, the Corporation of the Municipality of Arran-Elderslie, the Corporation of the Municipality of Brockton, the Corporation of the Municipality of Kincardine, the Corporation of the Municipality of West Grey, the Corporation of the Township of Chatsworth and the Corporation of the Township of Huron-Kinloss each, by by-law, grant the right to EPCOR Natural Gas Limited Partnership to construct and operate works for the distribution, transmission and storage of natural gas and the right to extend and add to the works in the County of Bruce, the County of Grey, the Municipality of Arran-Elderslie, the Municipality of Brockton, the Municipality of Kincardine, the Municipality of West Grey, the Township of Chatsworth and the Township of Huron-Kinloss;

AND IN THE MATTER OF an application by EPCOR Natural Gas Limited Partnership under section 8 of the *Municipal Franchises Act* for an order or orders granting a Certificate of Public Convenience and Necessity to EPCOR Natural Gas Limited Partnership for the construction of works and the right to extend and add works in the County of Bruce, the County of Grey, the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth:

AND IN THE MATTER OF an application by EPCOR Natural Gas Limited Partnership for orders directing and declaring that the assent of the municipal electors of each of the Corporation of the County of Bruce, the Corporation of the County of Grey, the Corporation of the Municipality of Arran-Elderslie, the Corporation of the Municipality of Brockton, the Corporation of the Municipality of Kincardine, the Corporation of the Municipality of West Grey, the Corporation of the Township of Chatsworth and the Corporation of the Township of Huron-Kinloss to the by-law is not necessary.

1

## REQUEST FOR INTERVENOR STATUS OF ENBRIDGE GAS INC.

- 1. Enbridge Gas Inc. ("Enbridge Gas") hereby applies for Intervenor Status in this proceeding pursuant to the above-captioned matter.
- 2. Enbridge Gas is an Ontario Corporation with its Registered Offices at the City of Toronto and the Municipality of Chatham-Kent, in the Province of Ontario. Enbridge Gas 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. EPCOR Natural Gas Limited Partnership ("EPCOR") is a customer of Enbridge Gas and holds several contracts with Enbridge Gas for the transportation, delivery and sale of natural gas to EPCOR's system in the Aylmer area. In its application, EPCOR refers to the proposed Southern Bruce mainline interconnecting with the existing high pressure Enbridge Gas pipeline in the Township of Chatsworth and the need for Enbridge Gas to complete the installation of a custody transfer station in order for EPCOR to provide gas distribution services within the Southern Bruce area.
- 4. Enbridge Gas 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 Enbridge Gas' operations and/or rates.
- 5. Enbridge Gas 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. Enbridge Gas' preference is to receive searchable electronic versions of filings in this proceeding.
- 6. At this time, it is Enbridge Gas' intention to monitor the proceeding; however, after reviewing the evidence, Enbridge Gas may wish to address one or more of the issues.
- 7. Enbridge Gas reserves the right to adduce evidence, submit interrogatories, cross-examine witnesses, advance argument and participate in the hearing as circumstances may require.

8. Communications relating to this intervention should be directed to:

Patrick McMahon Specialist, Regulatory Research and Records Enbridge Gas Inc. 50 Keil Drive North Chatham, Ontario N7M 5M1

Telephone: (519) 436-5325

Email: pmcmahon@uniongas.com

-3-

9. Enbridge Gas will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 8<sup>th</sup> day of April, 2019.

## ENBRIDGE GAS INC.

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