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**MUNICIPALITY OF KINCARDINE, MUNICIPALITY OF ARRAN-  
ELDERSLIE, TOWNSHIP OF HURON-KINLOSS  
("SOUTHERN BRUCE MUNICIPALITIES")**

**WRITTEN SUBMISSIONS**

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June 3, 2019

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**SOUTHERN BRUCE MUNICIPALITIES  
WRITTEN SUBMISSIONS**

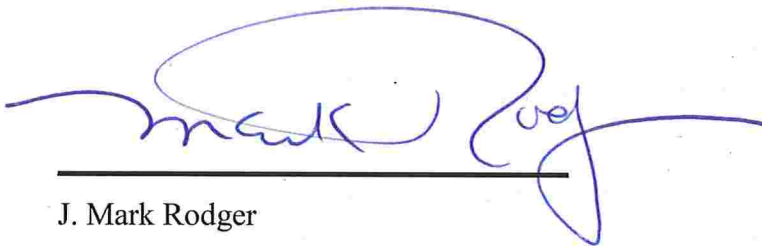
1. We make these submissions on behalf of the Municipality of Kincardine, the Municipality of Arran-Elderslie and the Township of Huron-Kinloss (collectively the "**Southern Bruce Municipalities**") in respect of the application brought by EPCOR Natural Gas Limited Partnership ("**EPCOR**") for Orders of the Ontario Energy Board (the "**OEB**" or the "**Board**") granting leave to construct natural gas distribution pipelines and ancillary facilities to serve the Southern Bruce Municipalities and for associated approvals (the "**Application**").
2. In Procedural Orders No. 1 and No. 2 of the above-noted proceeding, the Board made provision for parties to file written submissions.
3. The Southern Bruce Municipalities have undertaken a lengthy 7-year process in their collective quest to achieve the provision of natural gas services for the benefit of their respective residents, institutions, farms and businesses. Following completion of a competitive Request for Information process which identified multiple potential developers from across North America to construct, own and operate a new natural gas distribution utility to serve the Southern Bruce Municipalities, on September 21, 2015, the Southern Bruce Municipalities announced that they had selected EPCOR as the proponent to bring natural gas to their communities and the Council's approved a Municipal Franchise Agreement with EPCOR shortly thereafter.
4. It has now been close to two years since the Southern Bruce Municipalities signed the Municipal Franchise Agreement with EPCOR. There exists a continuous, growing urgency to provide the residents and businesses in the Southern Bruce Municipalities with access to natural gas.
5. In the Board's decision in EB-2016-0137, EB-2016-0138 and EB-2016-139 issued on April 12, 2018 (the "**Expansion Decision**") the Board granted EPCOR, as the successful proponent for the Southern Bruce gas distribution project, Certificates of Public Convenience and

Necessity for each of the Municipality of Arran- Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss, conditional on the approval of this Application.

6. The Southern Bruce Municipalities have reviewed the Application and supporting documentation/responses to interrogatories filed by EPCOR in this proceeding and support EPCOR's submissions in respect of its Leave to Construct application.

7. For all these reasons the Southern Bruce Municipalities respectfully submit that Board approve EPCOR's Leave to Construct application.

All of which is respectfully submitted.



J. Mark Rodger

Counsel to the Municipality of Kincardine, the Municipality of Arran-Elderslie and the Township of Huron-Kinloss