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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

**Attention: Kirsten Walli
Board Secretary**

Dear Madam:

Re: EB-2018-0329 – Objection by Nipigon LNG Corporation (“NLNG”) in its capacity as the general partner of Nipigon LNG LP in respect of Vulnerable Energy Consumers Coalition’s (“VECC”) Intervenor Request

- 1) We act as counsel to NLNG in respect of the above-noted matter. Pursuant to the Notice issued by the Board on September 12, 2019, NLNG submitted an intervenor request to the Board in respect of proceeding EB-2018-0329 (the “Proceeding”) on September 27, 2019.¹
- 2) The Proceeding relates to an application by the Corporation of the Town of Marathon, on behalf of its partner municipalities, the Township of Manitouwadge, the Township of Schreiber, the Township of Terrace Bay, and the Municipality of Wawa (the “Municipalities”) to the Board for approval to construct a total of 116.5 kilometres of natural gas pipelines (the “Application”).
- 3) We are writing to object to the Notice of Intervention filed by counsel to VECC on October 1, 2019.

Objection to the Notice of Intervention

- 4) VECC has failed to establish reasonable grounds for intervention under the “substantial interest” test, and appears to be misinformed on the purpose and state of the Project.
- 5) Pursuant to Rule 22.02 of the Board’s *Rules of Practice and Procedure* (“Rules”), to be granted intervenor status, the party seeking status must satisfy the Board that they have a

¹ See Attached, Schedule 1.

