



2000 – 10423 101 St NW,
Edmonton, Alberta
T5H 0E8 Canada
epcor.com

October 21, 2019

Sent by Electronic Mail, Courier & RESS Electronic Filing

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

Dear Ms. Walli:

**RE: EB-2019-0183 – Owen Sound Reinforcement Project Leave to Construct and M17
Application- Notice of Intervention for EPCOR Natural Gas Limited Partnership (ENGLP)**

Please find enclosed a notice of intervention, filed on behalf of ENGLP in the above-noted matter.

Yours truly,

Original Signed By:

Daniela O'Callaghan
Legal Counsel, EPCOR Utilities Inc.
Phone: (780) 412-4081
Email: docallaghan@epcor.com

cc: Brandon Ott, Enbridge Gas Ltd.
Guri Pannu, Enbridge Gas Ltd.
C. Keizer, Torys
Bruce Brandell, EPCOR Natural Gas Limited Partnership

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Schedule B);

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving a new firm transportation service for gas distributors under the Rate M17 rate class, effective December 1, 2019;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders modifying the applicability of the existing Rate M9 and Rate T3 rate schedules for existing gas distributors; and

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Municipality of West Grey and the Township of Chatsworth;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving the form of various land agreements.

**APPLICATION FOR INTERVENOR STATUS FOR
EPCOR NATURAL GAS LIMITED PARTNERSHIP**

1. EPCOR Natural Gas Limited Partnership (ENGLP) hereby applies for Intervenor Status in the above-noted proceeding. ENGLP is a subsidiary of the parent company, EPCOR Utilities Inc.
2. The EPCOR family of companies own and operate electrical, natural gas and water transmission and distribution networks, water and wastewater transportation facilities, sanitary and stormwater systems, and infrastructure in Canada and the United States.
3. In Ontario, ENGLP owns and operates a natural gas distribution system in and around Aylmer, Ontario. In order to serve its distribution customers, it takes service from Enbridge Gas Inc. ("Enbridge"), previously Union Gas Limited. In other words, ENGLP is an M9 customer of Enbridge and holds several contracts with Enbridge for the transportation, delivery and sale of natural gas to ENGLP's gas distribution system.
4. By way of background, in EB-2016-0137/0138/0139, EPCOR South Bruce Gas Inc. (a subsidiary of EPCOR Utilities Inc.) was selected as the successful proponent to serve the South Bruce municipalities. In EB-2018-0244, EPCOR South Bruce Gas Inc. was an

active intervenor in Enbridge's previous effort to obtain approval of its proposed M17 service. In EB-2018-0247, the Board approved the transfer of certificates of public convenience and necessity for the South Bruce municipalities from EPCOR Southern Bruce Gas Inc., to ENGLP. In EB-2018-0264, ENGLP filed a rate application seeking approval for gas distribution rates effective January 1, 2019 and for each following year through to December 31, 2028, for the gas distribution system serving the South Bruce expansion area.

5. ENGLP has a direct interest in Enbridge's application since the proposed new M17 service (and rate class) was developed by Enbridge in response to a request for gas distribution services to the South Bruce expansion area and Enbridge has stated that the Proposed Facilities are required to meet Enbridge's increasing demands as well as ENGLP's demands to serve the South Bruce expansion.
6. Consequently, ENGLP has an interest in the issues that will be raised in this proceeding, including without limitation, the terms and conditions of the proposed M17 service (including price), the eligibility of ENGLP to be served under one of Enbridge's existing rate classes, the costs of the Proposed Facilities as well as proposed cost allocation and the magnitude of, and rationale for, the contribution in aid of construction that Enbridge proposes to charge ENGLP. In addition, to the extent that Enbridge's application also proposes to modify the M9 service, ENGLP is an M9 ratepayer in connection with its gas distribution services in the Aylmer region of Ontario.
7. ENGLP intends to address one or more of the issues in this proceeding. To this end, ENGLP's participation may involve, *inter alia*, adducing evidence, submitting interrogatories, cross-examining witnesses, advancing argument and otherwise participating in the hearing, as the circumstances require.
8. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding. Therefore, we request the opportunity to make submissions on the nature of the hearing at that time.
9. ENGLP will not be seeking an award of costs in this proceeding.
10. ENGLP has electronic copies of the pre-filed materials and does not require hard copies.
11. Correspondence relating to this intervention should be directed to:

Bruce Brandell
Director
EPCOR Natural Gas Limited Partnership
2000-10423 101 St. NW
Edmonton, AB T5H 0E8

Tel: 780-412-3720
[E-mail: bbrandell@epcor.com](mailto:bbrandell@epcor.com)

Daniela O'Callaghan
Legal Counsel
EPCOR Natural Gas Limited Partnership
2000-10423 101 St. NW
Edmonton, AB T5H 0E8

Tel: 780-412-4081
[E-mail: docallaghan@epcor.com](mailto:docallaghan@epcor.com)

Richard J. King
Partner
Osler, Hoskin & Harcourt LLP
100 King Street West
1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto, ON M5X 1B8

Tel: 416-862-6626
[E-mail: rking@osler.com](mailto:rking@osler.com)

DATED this 21st day of October, 2019

Original Signed By:

Daniela O'Callaghan
Legal Counsel
EPCOR Natural Gas Limited Partnership