



Enbridge Gas Inc.  
50 Keil Drive North  
Chatham, Ontario, Canada  
N7M 5M1

November 20, 2019

Christine Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership  
Application for Amended CPCN for the Township of South-West Oxford  
Ontario Energy Board File No. EB-2019-0232**

Enbridge Gas Inc. respectfully requests intervenor status in the above-noted proceeding. Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

*[Original Signed By]*

Patrick McMahon  
Specialist, Regulatory Research and Records  
[patrick.mcmahon@enbridge.com](mailto:patrick.mcmahon@enbridge.com)  
(519) 436-5325

Encl.

c.c. (email only): Vince Cooney, EPCOR  
Patrick Welsh, Osler, Hoskin & Harcourt LLP

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** the *Municipal Franchises Act*, R.S.O. 1990, c. M.44, as amended;

**AND IN THE MATTER OF** an Application by EPCOR Natural Gas Limited Partnership for an Order amending its Certificate of Public Convenience and Necessity to construct works to supply natural gas in the Township of South-West Oxford.

**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. Enbridge Gas holds a franchise agreement and certificate of public convenience and necessity ("CPCN") allowing it to provide gas services to approximately 1266 customers within the Township of South-West Oxford. Enbridge Gas' CPCN specifically includes the area in which the Applicant is proposing to serve end-use customers.
4. In its application, EPCOR Natural Gas Limited Partnership ("EPCOR") is proposing changes to its CPCN for the Township of South-West Oxford to allow it to extend its gas distribution system to serve approximately 79 customers within the former Village of Salford.
5. Upon review of the costs to extend our existing infrastructure to provide service to these customers, Enbridge Gas has determined that, although we would like to connect these customers, we believe that it is more economic for EPCOR to attach these specific customers to their system.
6. Beyond the impact that this application could have on our CPCN rights within the Township of South-West Oxford, 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.

7. 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.
8. It is Enbridge Gas' intention to actively participate in this proceeding with respect to ensuring that our CPCN rights within the Township of South-West Oxford are protected and they are only impacted to allow service to be provided to the customers identified in the application.
9. Enbridge Gas reserves the right to adduce evidence, submit interrogatories, cross-examine witnesses, advance argument and participate in the hearing as circumstances may require.
10. 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: [patrick.mcmahon@enbridge.com](mailto:patrick.mcmahon@enbridge.com)
11. Enbridge Gas will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 20<sup>th</sup> day of November, 2019.

ENBRIDGE GAS INC.

*[Original signed by]*

Per: \_\_\_\_\_  
Patrick McMahon  
Specialist, Regulatory Research and Records