

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders under section 36 of the Act approving certain rate mechanisms for expansion projects and a capital factor for project economic feasibility as per E.B.O. 188 Guidelines.

**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 and is constructing a natural gas distribution system to connect and serve certain municipalities in the South Bruce area of Ontario. In order to serve its distribution customers, ENGLP takes service from Enbridge Gas Inc. ("Enbridge"), previously Union Gas Limited. ENGLP, through its operations, is a customer of Enbridge. In that regard, ENGLP holds several contracts with Enbridge for the transportation, delivery and sale of natural gas to ENGLP's gas distribution systems.
4. Enbridge's application seeks approval for a System Expansion Surcharge for future community expansion projects ("SES"), a Temporary Connection Surcharge for small main extensions and customer attachment projects ("TEC"), and an Hourly Allocation Factor ("HAF") to be applied in the economic feasibility calculation of future development projects. According to the application, Enbridge is seeking to harmonize the SES, TEC and HAF for the EDG and Union Rate zones and to accommodate the anticipated demand for future expansion projects without having to seek Board approval on a project specific basis.
5. An Ontario Energy Board order in this proceeding has the potential to impact rates payable by Enbridge's customers as well as policies and applicable surcharges for natural gas system expansion. Accordingly, ENGLP has a direct interest in Enbridge's application. As Enbridge's customer and competitor in the expansion of natural gas distribution in Ontario, ENGLP will be directly impacted by the proposed System Expansion Surcharge ("SES"), the Temporary Connection Surcharge ("TCS") and Hourly Allocation Factor ("HAF").

Consequently, EPCOR seeks to better understand the purpose and mechanics of Enbridge's application and to actively participate in the proceeding.

6. ENGLP has an interest in the issues that will be raised in this proceeding, including without limitation: the new charges and related changes to rate schedules, and proposed amendments to the Company's feasibility policies and related changes to its Conditions of Service.
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. ENGLP agrees that a written hearing, along with an interrogatory process is the most efficient way of determining the issues raised by the application.
9. ENGLP will not be seeking an award of costs in this proceeding.
10. ENGLP has electronic copies of the filed materials and does not require hard copies.
11. All correspondence and documentation relating to this intervention should be directed to:

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DATED this 8th day of June, 2020

[Original Signed By]

Daniela O'Callaghan
Legal Counsel
EPCOR Utilities Inc.