

Reply to the Attention of: Mike Richmond  
Direct Line: 416.865.7832  
Direct Fax: mike.richmond@mcmillan.ca  
Date: June 9, 2020

**RESS & EMAIL** [BoardSec@oeb.ca](mailto:BoardSec@oeb.ca)

Christine Long  
Registrar and Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0094  
Enbridge Gas Inc. Application for Harmonized System Expansion Surcharge,  
Temporary Connection Surcharge and Hourly Allocation Factor  
Application for Intervenor Status by Canadian Propane Association**

The Canadian Propane Association ("CPA") requests that it be granted intervenor status in the Ontario Energy Board (the "Board") application bearing no. EB-2020-0094 brought by Enbridge Gas Inc. ("Enbridge").

**CPA and its Membership**

CPA is the national voice of the propane industry in Canada, representing over 400 member companies in every region of the country. Members include propane producers, wholesalers, transporters, equipment and appliance retailers, manufacturers, and distributors, and associated industries.

CPA works with governments and regulators on policy issues that affect the propane industry, such as providing cost efficient energy to consumers. It provides key services such as industry training through the Propane Training Institute and emergency response for liquid propane gas and flammable liquids through Emergency Response Assistance Canada. CPA also provides industry members with a forum to collaborate on best practices for propane.

**CPA's Interest in this Proceeding**

CPA's grounds for, and interest in, this application are twofold. First, CPA represents propane industry members who currently serve the communities and customers that Enbridge seeks to supply with natural gas through this application. If natural gas becomes available in those communities and to those customers as an alternative to propane, the businesses and customer base of CPA members serving those communities will be directly impacted. Further, CPA members' customers who choose not to convert or are not eligible

to convert may also be significantly impacted as the economics of serving those remaining customers changes. This in turn will lead to further direct impacts on CPA members.

Second, the Application submitted by Enbridge and the proposed surcharges rely heavily on Enbridge's forecasts of customer attachments, volumes and connection costs, which in turn rely heavily on the purported conversion savings claimed by Enbridge. As many of the conversions would be from propane to natural gas supply, CPA, its members and their customers are in the best position to help the Board test and verify these claims and forecasts.

### Issues to be Addressed

CPA intends to focus its participation on:

- the accuracy of Enbridge's forecasts and estimates, including clarity around the connection costs to switch to natural gas; and
- the proposed treatment of various costs and revenues.

### Written Hearing

CPA submits that a written hearing with opportunities for all parties to submit evidence, followed by interrogatories, is the most appropriate procedure for this application.

### Costs

CPA requests that it be eligible to recover its costs. CPA represents the interests and policy perspectives of the propane industry, which includes the development of an efficient and cost effective energy sector. This is relevant to the Board's mandate and the policy considerations underlying this application. The Board previously held that CPA was eligible for costs in Phase I and II of EB-2015-0179 and EB-2016-0004, which involved similar issues to those raised in this application. As such, CPA submits that it meets the eligibility requirements under section 3.03(b) of the Board's *Practice Direction on Cost Awards*.

### Communication and Representatives

CPA requests that copies of written evidence and all circulated correspondence related to this matter be directed as follows:

<i>Email only:</i>	<i>Email only:</i>	<i>Email only:</i>
Mike Richmond McMillan LLP	Nathalie St. Pierre Chief Executive Officer Canadian Propane Association	Allan Murphy Vice-President, Government Relations Canadian Propane Association
mike.richmond@mcmillan.ca	nathaliestpierre@propane.ca	allanmurphy@propane.ca

On behalf of CPA, we appreciate the Board's consideration of this submission.

Yours truly,

A handwritten signature in black ink, appearing to read "Mike Richmond".

Mike Richmond

cc     Rakesh Torul (Enbridge)  
       Tania Persad (Enbridge)