

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 the Enbridge Gas Inc. Integrated Resource Planning Proposal.

**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") and 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 system.
4. Enbridge submitted an Integrated Resource Planning (IRP) proposal to the Ontario Energy Board (Board) as part of its Leave to Construct Application for 10.2 km pipeline expansion within the City of Hamilton ("Dawn-Parkway Expansion" proceeding, EB-2019-0159). Enbridge requested that the Board determine that its IRP proposal, in relation to the Dawn-Parkway Expansion project and for application to future Enbridge Gas projects, is reasonable and appropriate.
5. As a result, on April 28, 2020, the Board issued a Notice of Hearing which initiated a review of the IRP proposal as a separate proceeding and invited parties wishing to participate to file an intervention request by May 13, 2020. ENGLP is filing a late application for intervenor status as a result of an administrative error.
6. ENGLP submits that this request should be granted for the following reasons:
 - a) The participants in this proceeding will not be prejudiced.

b) This proceeding is still in its early stages and a final issues list has not yet been determined. As a result, it is anticipated that this request will not alter the timelines for future procedural steps in this matter.

c) ENGLP's full participation may assist the Board in making a considered decision on the issues.

7. ENGLP has a substantial interest in the issues that will be raised in this proceeding. As noted by the Board in Procedural Order #1, dated May 21, 2020 in this matter, "...Enbridge Gas' IRP proposal has potentially wide-reaching impacts regarding Enbridge's natural gas system, including its customers." As a customer and fully embedded natural gas distributor, ENGLP's South Bruce and Aylmer operations may be impacted by a Board order in this matter. Furthermore, it is possible that this proceeding may establish a precedent with respect to any IRP proposal framework and its applicability to other gas utilities operating in Ontario.
8. EPCOR would like to have the opportunity to better understand the IRP proposal and its direct and consequential impacts to customers and embedded natural gas distributors, as well as to address any issues which may arise regarding its precedential value to other natural gas distributors.
9. 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.
10. ENGLP will not be seeking an award of costs in this proceeding.
11. ENGLP has electronic copies of the filed materials and does not require hard copies.
12. Correspondence relating to this intervention should be directed to:

Vince Cooney
Senior Manager, Regulatory Affairs, Ontario
EPCOR Natural Gas Limited
Suite 710, 55 University Avenue
Toronto, ON

Tel: 647-730-0013
Email: vcooney@epcor.com

Daniela O'Callaghan
Legal Counsel
EPCOR Utilities Inc.,
2000-10423 101 St. NW
Edmonton, AB T5H 0E8

Tel: 780-412-4081
E-mail: docallaghan@epcor.com

DATED this 22nd day of June, 2020

Vince Cooney
Senior Manager, Regulatory
ENGLP