



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

December 7, 2020

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership
Application to Amend Certificate of Public Convenience and Necessity
Ontario Energy Board File Number: EB-2020-0232**

Enbridge Gas Inc. respectfully requests intervenor status in the above-noted proceeding and we would appreciate being copied (electronically) on correspondence and other materials submitted to the regulatory record on this matter.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

Patrick McMahon
Technical Manager, Regulatory Research and Records
patrick.mcmahon@enbridge.com
(519) 436-5325

c.c. (email only): Tim Hesselink, EPCOR Utilities Inc.
Daniela O'Callaghan, EPCOR Utilities Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, 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 a certificate of public convenience and necessity (CPCN) allowing it to provide gas services to approximately 1,155 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 9 customers within the Dereham Line - Mount Elgin Road - McBeth Road areas.
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 the Ontario Energy 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 EPCOR 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
Technical Manager, Regulatory Research and Records
Enbridge Gas Inc.
50 Keil Drive North
Chatham, Ontario N7M 5M1

Telephone: (519) 436-5325
Email: 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 7th day of December 2020.

ENBRIDGE GAS INC.

Patrick McMahon
Technical Manager, Regulatory Research and Records