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March 2, 2021  
Our File No. 71091

Ontario Energy Board  
23 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

**Attention: Kristen Walli, Board Secretary**

Dear Ms. Walli,

**Re: Consultation to Review Annual Update to Five-Year Natural Gas  
Supply Plans  
Ontario Energy Board: EB-2021-0004**

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The law firm of Weiler, Maloney, Nelson has been retained as external counsel for the following parties with respect to the above noted matter:

- the Thunder Bay Chamber of Commerce ("TBCOC") on behalf of,
- the Chambers of Commerce of Northwestern Ontario ("COCNW");

(collectively the "NWCOC Coalition").

We advise the Ontario Energy Board ("OEB") that our clients accept the invitation in their letter dated February 19, 2021, to participate in the consultation to review Enbridge Gas Inc.'s (Enbridge Gas) Annual Update to its five-year natural gas supply plan (GSP).

Accordingly, we write this letter to indicate our clients' intent to participate by filing this letter with the OEB by March 2, 2021, and seek eligibility for costs in accordance with your *Practice Direction on Cost Awards*.

## **Background**

### **NWCOC:**

NWCOC represents over 2,000 commercial and business consumers in the Northwest Region, primarily small business, in their capacity as ratepayers (and in the case of those businesses

**Weiler, Maloney, Nelson**

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located in communities that do not yet have access to natural gas, prospective future ratepayers) of regulated services. NWCOC covers a large geographical area that includes every Chamber of Commerce from Marathon to the Manitoba border.

### **Substantial Interest**

NWCOC has a substantial interest in this consultation because it:

1. represents the member businesses of the individual Chambers of Commerce throughout the Northwest Region;
2. understands and can speak to the direct interests of the industrial, business, commercial and residential ratepayers (and in the case of those businesses located in communities that do not yet have access to natural gas, prospective future ratepayers) throughout the Northwest Region (population approximately 250,000);
3. membership will be directly impacted by:
  - a. the creation of new or revisions to existing GSP such as this Consultation, with respect to cost effectiveness, reliability (which includes security of supply) and support for public policy of natural gas service in rural and remote Ontario communities; and
  - b. the demand forecasts and the determination of the appropriate portfolio of transportation and storage assets required to meet customer demand;
4. is keenly aware of the short, medium, and long terms issues with respect to transmission and distribution of natural gas its members face in the Northwest Region, and as such can provide important and unique perspectives of ratepayers (and in the case of those businesses located in communities that do not yet have access to natural gas, prospective future ratepayers) in relation to GSP;
5. is interested in ensuring that GSP as it applies to the Northwest region are appropriately developed and that the proposed mechanisms or revisions to any existing plan reflect and consider issues specific to the Northwest Region; and
6. is in a position to provide the OEB clearly defined consumer needs with respect to GSP to ensure the needs of current and future members of our client are considered.

### **Stakeholder Conference**

We intend to participate in the Stakeholder Conference on April 13, 14, 2021 by webcast.

## **Cost Awards**

TBCOC will, individually, seek designation as persons, under Section 30 of the *Ontario Energy Board Act, 1998*, eligible to receive costs. The basis for the designation would be the representative nature of the TBCOC in the Northwest Region itself and the indicated collaboration of the NWCOC Coalition. Each of TBCOC and NWCOC represent the direct interests of consumers, as ratepayers (and in the case of businesses located in communities that do not yet have access to natural gas, prospective future ratepayers), in relation to the GSP and each can offer important and unique perspectives to the OEB.

The businesses forming the membership of NWCOC are not individually ineligible by reason of any of the criteria contained in section 3.05 of the *Practice Direction on Cost Awards*.

In addition, both TBCOC and NWCOC represent an interest or policy perspective relevant to the Board's mandate and to this Consultation.

NWCOC represents the direct interest of ratepayers (and in the case of those businesses located in communities that do not yet have access to natural gas, prospective future ratepayers), especially the small businesses, throughout the Northwest Region. GSP for natural gas (or the lack thereof) impact those ratepayers (or prospective ratepayers, as the case may be) whose livelihood depends typically on a single industrial employer in a town.

NWCOC represents a public interest in seeking to ensure GSP for natural gas for Enbridge positively impacts existing and future businesses, consumers, and ratepayers (and in the case of businesses located in communities that do not yet have access to natural gas, prospective future ratepayers) in the Northwest Region and the industries that they supply with goods and services.

NWCOC can offer clearly defined consumer needs to the OEB in relation to whether GSP natural gas in Ontario reflect the specific geographic, economic and social issues effecting ratepayers (and in the case of businesses located in communities that do not yet have access to natural gas, prospective future ratepayers), consumers and businesses in the Northwest Region.

NWCOC and their members, are or represent persons with a significant interest in land that is or may be affected by the GSP for natural gas. That interest in some instances may be a private interest, but in every case it is a public interest.

## **Spokesperson for the NWCOC Coalition**

- Nicola A. Melchiorre, Partner in the firm of Weiler, Maloney, Nelson (called to the Bar in 2004, licenced by the Law Society of Upper Canada to practice law in Ontario).

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- Mark P. Mikulasik, associate in the firm of Weiler, Maloney, Nelson (called to the Bar in 2013, licenced by the Law Society of Ontario to practice law in Ontario).

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Yours very truly,

WEILER, MALONEY, NELSON

Per:



NICK A. MELCHIORRE

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