



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

November 22, 2021

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 for Approval of Franchise Agreements with and Amended Certificates of
Public Convenience and Necessity for the Municipality of Brockton, the Township of
Chatsworth and the Municipality of West Grey
Ontario Energy Board File Number: EB-2021-0269**

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 Natural Gas Limited Partnership
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 Certificates of Public Convenience and Necessity to construct works to supply natural gas in the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey;

AND IN THE MATTER OF an Application by EPCOR Natural Gas Limited Partnership for an Order approving the terms and conditions upon which, and the period for which, the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey each, by by-law, grant the right to EPCOR Natural Gas Limited Partnership to construct and operate works for the distribution transmission and storage of natural gas and the right to extend and add to the works in these municipalities.

**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 franchise agreements and a certificates of public convenience and necessity (CPCNs) allowing it to provide gas services to approximately 2,483 customers within the Municipality of Brockton, approximately 752 customers within the Township of Chatsworth and approximately 1,488 customers within the Municipality of West Grey.
4. While not formally amended in the EB-2018-0263 proceeding, it is assumed that Enbridge Gas' CPCNs for these municipalities exclude the areas currently covered by the limited CPCNs granted to EPCOR Natural Gas Limited Partnership for the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey which authorize EPCOR to construct a pipeline that traverses these municipalities to serve the Southern Bruce municipalities.

5. In its application, EPCOR has applied for approval of franchise agreements with each of the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey, and is proposing to:
 - amend its current CPCN for the Municipality of Brockton to include the whole municipality excluding areas located east of Bruce Road 3 and south of Concession Rd 4 West;
 - amend its current CPCN for the Township of Chatsworth to include an area bounded by Bruce Road 10 starting at Bentinck-Sullivan Townline and ending at Sideroad 7, continuing east on Sideroad 7 ending at Grey Road 3 and continuing south on Grey Road 3 and ending at Bentinck-Sullivan Townline; and
 - amend its current CPCN for the Municipality of West Grey to include an area bounded by Bruce Road 10 starting at Bentinck-Sullivan Townline and ending at Concession Road 6, east down Concession Road 6 ending at Grey Road 3 and continuing north on Grey Road 3 and ending at Bentinck-Sullivan Townline.
6. EPCOR ties its current application to its project proposal submitted pursuant to Phase II of Ontario's Natural Gas Expansion Program through which EPCOR will be provided up to \$20,340,000 to expand access to natural gas within the Municipality of Brockton (specifically the communities of Elmwood (which straddles the border with the Municipality of West Grey), Solway, Glammis, Cargill, Chepstow, Pinkerton, Narva, Greenock, Vesta and Riversdale (per Ontario Regulation 451/21).
7. Beyond the impact that this application could have on our CPCN rights within the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey, 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.
8. 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.
9. It is Enbridge Gas' intention to actively participate in this proceeding with respect to ensuring that our CPCN rights within the Municipality of Brockton, the Township of Chatsworth and the Municipality of West Grey are protected and they are only impacted to allow access to gas service to be provided to the customers identified in the application.

10. Enbridge Gas reserves the right to adduce evidence, submit interrogatories, cross-examine witnesses, advance argument and participate in the hearing as circumstances may require.

11. 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

12. Enbridge Gas will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 22nd day of November 2021.

ENBRIDGE GAS INC.

Patrick McMahon
Technical Manager, Regulatory Research and Records