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BY RESS AND EMAIL

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas" or "the Company")
Ontario Energy Board ("OEB") File No.: EB-2021-0078
2022 Storage Enhancement Project ("Project") Intervenor Requests**

Enbridge Gas is aware of intervention requests for the above noted proceeding by the Ministry of Northern Development, Mines, Natural Resources and Forestry ("MNDMNRF") and Mr. Bryan Arnold. Enbridge Gas has no objection to MNDMNRF's intervention request. While Enbridge Gas generally does not oppose Mr. Arnold's request to become an intervenor in this proceeding, the Company would like to note several factors for consideration by the OEB in assessing Mr. Arnold's request.

Enbridge Gas notes that Mr. Arnold's intervention request does not appear to comply with section 22 of the OEB's *Rules of Practice and Procedure* ("Rules"). Specifically, Mr. Arnold's request does not provide any information in support of his interest in the Project nor a description of the nature and scope of his intended participation in the proceeding. Enbridge Gas does not anticipate any direct impacts to Mr. Arnold or his property resulting from the Project. Furthermore, Mr. Arnold's request was submitted after the December 6th deadline for intervenor requests as established by the OEB and does not indicate any reasons for the late application in accordance with section 22.05 of the Rules.

Enbridge Gas also notes that Mr. Arnold has applied to be an intervenor representing himself and "all related landowners of the three Gas Pools." Mr. Arnold does not specifically identify the other landowners or their interests in the proceeding and does not provide any indication that the other landowners consent to Mr. Arnold representing them. Enbridge Gas respectfully submits that Mr. Arnold cannot represent other landowners without specifically identifying them and providing some evidence of their consent and interests in the proceeding. Enbridge Gas reserves the right to respond to any further information that Mr. Arnold may provide in this regard

If you have any questions, please contact the undersigned.

Sincerely,

Tania Persad
Senior Legal Counsel, Enbridge Gas Inc

