



Stephanie Allman
Regulatory Coordinator

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Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

August 15, 2023

VIA EMAIL and RESS

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2022-0335
Integrated Resource Planning (IRP) Pilot Projects– Early Access Application
Affidavit of Service**

On August 8, 2023, the OEB issued the Notice of Hearing and Letter of Direction for the above noted proceeding.

As directed by the OEB, enclosed please find the Affidavit of Service which has been filed through the OEB's Regulatory Electronic Submission System.

Please contact the undersigned if you have any questions.

Sincerely,

Stephanie Allman
Regulatory Coordinator

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 36 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders approving the cost consequences of Integrated Resource Planning ("IRP") Plans for IRP Pilot Projects in the Town of Parry Sound, and the City of Sarnia and Town of Plympton-Wyoming.

AFFIDAVIT OF SERVICE

I, Stephanie Allman, of the Town of Innisfil, make oath and say as follows:

1. I am in the employ of Enbridge Gas Inc. ("Enbridge") and as such have knowledge of the matters hereinafter deposed to.
2. Pursuant to the August 8, 2023 Letter of Direction from the Ontario Energy Board (OEB), I caused to be served by courier a copy of the Notice of Hearing (Exhibit "A"), Enbridge's Application (Exhibit "B"), along with the Enbridge Gas's evidence in this proceeding. Due to size this evidence is not attached with this affidavit.
3. Attached hereto is proof in the form of email (Exhibit "C"), that the relevant Notice of Hearing, and Enbridge's Application and evidence was served the following as requested by the OEB in the Letter of Direction. Personal information has been redacted from the landowner and encumbrancer listing.
 - all intervenors in the following proceedings: Integrated Resource Planning Proposal (EB-2020-0091)
 - all members of the Integrated Resource Planning Technical Working Group (EB-2021-0246)
4. In accordance with the Letter of Direction, I caused a copy of the Notice, Application and evidence to be placed in a prominent place on Enbridge's website. Attached as Exhibit "D" is proof of the information posted to Enbridge Gas Inc.'s website.

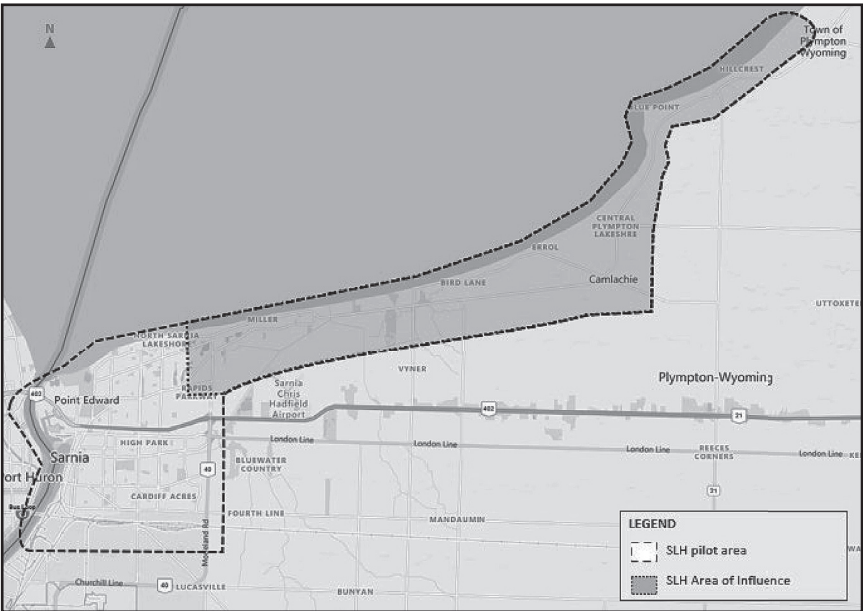
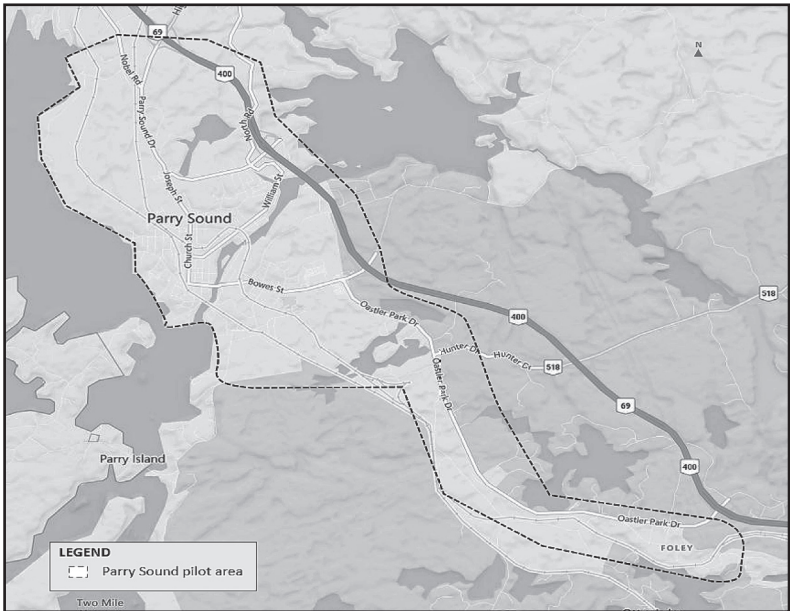
SWORN before me in the City of
Toronto, this 15th day of August,
2023.

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)

Stephanie Allman

Enbridge Gas Inc. has applied for approval of costs and the accounting treatment of costs, associated with two Integrated Resource Planning Pilot Projects.

Learn more. Have your say.



Integrated Resource Planning (IRP) is a natural gas system planning process that identifies and evaluates the potential for various alternatives to traditional pipeline infrastructure to meet natural gas system needs. Enbridge Gas Inc. (Enbridge Gas) has identified two areas where deploying IRP alternatives can help meet a system need (IRP Pilot Projects) and has applied to the Ontario Energy Board for an order or orders approving the cost consequences of these two IRP Pilot Projects. Enbridge Gas has also applied for approval of the proposed accounting treatment to record costs of the same in Enbridge Gas’s IRP costs deferral accounts for later disposition and recovery.

Enbridge Gas is bringing forward these two IRP Pilot Projects pursuant to Appendix A of the IRP Framework (issued in OEB File No. EB-2020-0091), which noted “Enbridge Gas is expected to develop and implement two IRP pilot projects. The pilots are expected to be an effective approach to understand and evaluate how IRP can be implemented to avoid, delay, or reduce facility projects.” In response, Enbridge Gas designed two IRP Pilot Projects to implement demand-side IRP Alternatives (“IRPAs”) in combination with supply-side IRPAs in the communities of Parry Sound (the “Parry Sound Pilot Project”) and the City of Sarnia and Town of Plympton Wyoming (the “Southern Lake Huron Pilot Project”). These IRP Pilot Projects aim to mitigate identified system constraints and associated facility reinforcement projects, and are also intended to provide learnings regarding future IRPA design, performance, and potential for scalability.

A map of the two proposed IRP Pilot Project Areas is provided above.

THE ONTARIO ENERGY BOARD WILL HOLD A PUBLIC HEARING

The Ontario Energy Board (OEB) will hold a public hearing to consider Enbridge Gas’s application. During the hearing, which could be an oral or written hearing, we will question Enbridge Gas on the case. We will also hear questions and arguments from individual consumers, municipalities and others whose interests would be affected. At the end of this hearing, the OEB will decide whether to approve the application.

The OEB is an independent and impartial public agency. We make decisions that serve the public interest. Our goal is to promote a financially viable and efficient energy sector that provides you with reliable energy services at a reasonable cost.

BE INFORMED AND HAVE YOUR SAY

You have the right to information regarding this application and to be involved in the process.

- You can review the application filed by Enbridge Gas on the OEB’s website now
- You can find information on the OEB’s website at www.oeb.ca/participate
- You can file a letter with your comments, which will be considered during the hearing
- You can become an intervenor. As an intervenor you can ask questions about Enbridge Gas’s application and make arguments on whether the OEB should approve Enbridge Gas’s request. Apply by **Monday, August 28, 2023** or the hearing will go ahead without you and you will not receive any further notice of the proceeding
- At the end of the process, you can review the OEB’s decision and its reasons on our website

LEARN MORE

Our file number for this case is **EB-2022-0335**. To learn more about this hearing, find instructions on how to file a letter with your comments or become an intervenor, or to access any document related to this case, please enter the file number **EB-2022-0335** on the OEB website: www.oeb.ca/participate. You can also phone our Public Information Centre at 1-877-632-2727 with any questions.

ORAL VS. WRITTEN HEARINGS

There are two types of OEB hearings – oral and written. Enbridge Gas has applied for a written hearing. The OEB is considering this request. If you think an oral hearing is needed, you can write to the OEB to explain why by **Monday, August 28, 2023**.

PRIVACY

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.

This hearing will be held under section 36 of the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B.

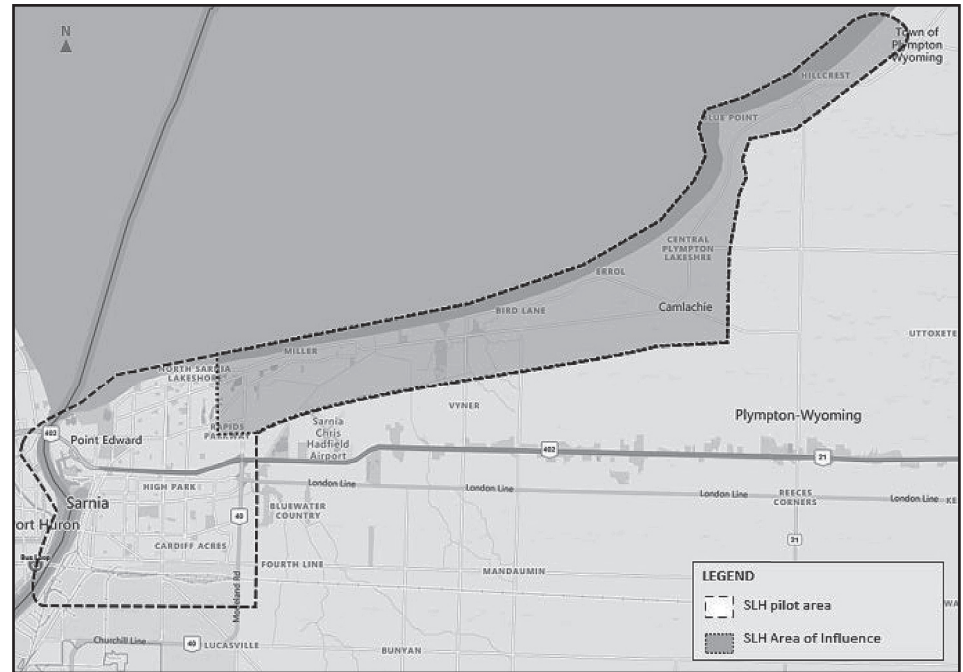
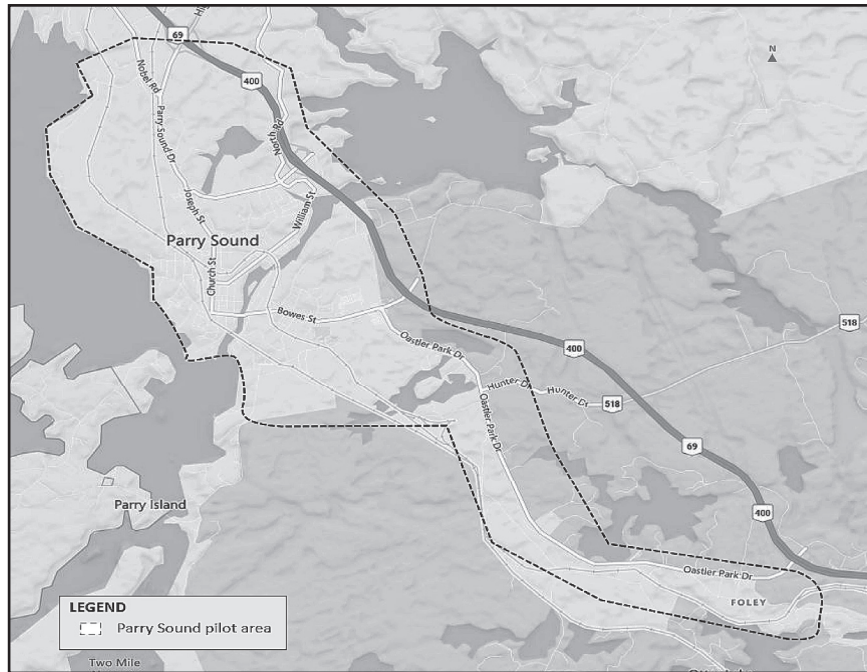
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto ON M4P 1E4
Attention: Registrar
Filings: <https://p-pes.ontarioenergyboard.ca/PivotalUX/>.
E-mail: registrar@oeb.ca



Ontario Energy Board | Commission de l’énergie de l’Ontario

Enbridge Gas Inc. a demandé l'approbation des coûts et du traitement comptable des coûts associés à deux projets pilotes de planification intégrée des ressources.

Renseignez-vous. Donnez votre avis.



La planification intégrée des ressources (PIR) désigne un processus de planification du réseau de gaz naturel permettant de déterminer et d'évaluer le potentiel de diverses solutions de rechange à l'infrastructure traditionnelle de gazoducs pour répondre aux besoins du réseau de gaz naturel. Enbridge Gas Inc. (Enbridge Gas) a trouvé deux domaines dans lesquels le déploiement de solutions de rechange en matière de PIR peut contribuer à répondre à un besoin du système (projets pilotes de PIR) et a demandé à la Commission de l'énergie de l'Ontario de rendre une ou plusieurs ordonnances approuvant les conséquences financières de ces deux projets pilotes de PIR. Enbridge Gas a également demandé l'approbation du traitement comptable proposé pour enregistrer les coûts correspondants dans les comptes de report des coûts de PIR d'Enbridge Gas en vue d'une cession et d'un recouvrement ultérieurs.

Enbridge Gas présente ces deux projets pilotes de PIR conformément à l'annexe A du cadre de PIR (publié dans le dossier no EB-2020-0091 de la CEO) qui précise qu'« Enbridge Gas devrait élaborer et mettre en œuvre deux projets pilotes de PIR. Les projets pilotes devraient constituer une approche efficace pour comprendre et évaluer la manière dont la PIR peut être mise en œuvre pour éviter, retarder ou réduire les projets d'installations. » [traduction] En réponse, Enbridge Gas a conçu deux projets pilotes de PIR pour mettre en œuvre des solutions de rechange en matière de PIR relativement à la demande en combinaison avec des solutions de rechange en matière de PIR relativement à l'offre dans les communautés de Parry Sound (le « projet pilote de Parry Sound ») et de la ville de Sarnia, ainsi que dans la ville de Plympton-Wyoming (le « projet pilote du sud du lac Huron »). Ces projets pilotes de PIR visent à atténuer les contraintes identifiées du système et les projets de renforcement des installations associés. Ils sont également destinés à fournir des enseignements concernant la conception, les performances et le potentiel d'évolutivité des futures solutions de rechange en matière de PIR.

Une carte des deux zones du projet pilote de PIR est fournie ci-dessus.

LA COMMISSION DE L'ÉNERGIE DE L'ONTARIO TIENDRA UNE AUDIENCE PUBLIQUE

La Commission de l'énergie de l'Ontario (CEO) tiendra une audience publique afin d'étudier la requête de Enbridge Gas. Durant l'audience, qui peut être une audience orale ou écrite, nous demanderons à Enbridge Gas de justifier la nécessité de ce changement. Nous écouterons également les questions et les arguments des consommateurs, des municipalités et de toute autre entité dont les intérêts sont en jeu. À l'issue de cette audience, la CEO prendra sa décision quant à l'approbation de la demande.

La CEO est une agence publique indépendante et impartiale. Les décisions que nous prenons visent à servir au mieux l'intérêt public. Notre objectif est d'encourager le développement d'un secteur de l'énergie efficace et financièrement viable, afin d'offrir des services énergétiques fiables à un prix raisonnable.

RENSEIGNEZ-VOUS ET DONNEZ VOTRE AVIS

Vous avez le droit d'être informé au sujet de cette demande et de participer au processus.

- Vous pouvez examiner la requête déposée par Enbridge Gas sur le site Web de la CEO dès maintenant.
- Vous trouverez des renseignements sur le site Web de la CEO à l'adresse suivante : www.oeb.ca/fr/participez
- Vous pouvez déposer une lettre de commentaires qui sera prise en compte au cours de l'audience.
- Vous pouvez participer à titre d'intervenant. En tant qu'intervenant, vous pouvez poser des questions sur la demande d'Enbridge Gas et présenter les raisons pour lesquelles la CEO devrait approuver la demande d'Enbridge Gas. Inscrivez-vous au plus tard le **Lundi 28 août 2023**, faute de quoi l'audience aura lieu sans votre participation et vous ne recevrez plus d'avis dans le cadre de ce dossier.
- Vous pourrez consulter la décision rendue par la CEO à l'issue de la procédure ainsi que les motifs de sa décision sur notre site Web.

EN SAVOIR PLUS

Le numéro de référence de ce dossier est **EB-2022-0335**. Pour obtenir de plus amples renseignements sur cette audience, sur les démarches à suivre pour déposer une lettre avec vos commentaires ou pour participer en tant qu'intervenant, ou encore pour consulter les documents relatifs à ce dossier, veuillez saisir le numéro de référence **EB-2022-0335** sur le site Web de la CEO : www.oeb.ca/fr/participez. Pour toute question, vous pouvez également communiquer avec notre centre d'information du public au 1 877 632-2727.

AUDIENCES ORALES OU AUDIENCES ÉCRITES

Il existe deux types d'audiences à la CEO : les audiences orales et les audiences écrites. Enbridge Gas a demandé une audience écrite. La CEO examine actuellement cette demande. Si vous pensez qu'une audience orale est nécessaire, vous pouvez faire part de vos arguments par écrit à la CEO au plus tard le **Lundi 28 août 2023**.

PROTECTION DES RENSEIGNEMENTS PERSONNELS

Si vous écrivez une lettre de commentaires, votre nom et le contenu de cette lettre seront ajoutés au dossier public et au site Web de la CEO. Toutefois, votre numéro de téléphone, votre adresse de domicile et votre adresse électronique ne seront pas rendus publics. Si vous représentez une entreprise, tous les renseignements de l'entreprise demeureront accessibles au public. Si vous participez à titre d'intervenant, tous vos renseignements seront rendus publics.

Cette audience sur les tarifs sera tenue en vertu de l'article 36 de la Loi de 1998 sur la Commission de l'énergie de l'Ontario, L.O 1998, chap. 15 (annexe B).

Commission de l'énergie de l'Ontario
C.P. 2319, 27^e étage

2300, rue Yonge
Toronto (Ontario) M4P 1E4

À l'attention de : Registraire

Dépôts : <https://p-pes.ontarioenergyboard.ca/PivotalUX/>.

Courriel : registrar@oeb.ca



Ontario
Energy
Board | Commission
de l'énergie
de l'Ontario

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 36 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders approving the cost consequences of Integrated Resource Planning (“IRP”) Plans for IRP Pilot Projects in the Town of Parry Sound, and the City of Sarnia and Town of Plympton-Wyoming.

APPLICATION

1. On July 22, 2021, the Ontario Energy Board (“OEB”) issued the first iteration of the IRP Framework for Enbridge Gas Inc. (“Enbridge Gas” or the “Company”) (EB-2020-0091, Appendix A). Section 12 of the IRP Framework states,

“Enbridge Gas is expected to develop and implement two IRP pilot projects. The pilots are expected to be an effective approach to understand and evaluate how IRP can be implemented to avoid, delay, or reduce facility projects”.

In accordance with the IRP Framework, Enbridge Gas hereby applies to the OEB pursuant to section 36 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B (the “Act”), for an Order or Orders approving the cost consequences of the IRP Plans for two “IRP Pilot Projects”, including approval to record the associated costs in the IRP costs deferral accounts.

2. The IRP Pilot Projects are designed to implement demand-side IRP Alternatives (“IRPAs”), including enhanced targeted energy efficiency (“ETEE”) programming and a residential demand response (“DR”) program in combination with supply-side IRPAs in the communities of Parry Sound (the “Parry Sound Pilot Project”) and the City of Sarnia and Town of Plympton Wyoming (the “Southern Lake

Huron Pilot Project”) in order to mitigate identified system constraints and associated facility reinforcement projects (as discussed in Exhibits B and D). The Pilot Projects will provide learnings on the selected IRPAs regarding future IRPA design, performance and potential for scalability.

3. The Parry Sound Pilot Project proposes to implement a suite of ETEE programming for residential, commercial and industrial customers in the Town of Parry Sound, including an enhanced version of existing Demand Side Management (“DSM”) offerings, a limited ETEE offering for electrification measures (featuring limited units of air source heat pumps and ground source heat pumps for residential only), and a new ETEE offering for Advanced Technologies (featuring limited units of simultaneous hybrid heating, gas heat pumps and thermal energy storage). Enbridge Gas also proposes to implement two supply-side IRPAs as part of the Parry Sound Pilot Project: (i) a negotiated increased pressure agreement from TC Energy (“TCE”); and (ii) CNG injection, to defer the system need during the Pilot Project term. The two supply-side IRPAs will ensure that Enbridge Gas can reliably meet system demand requirements (peak hour) while demand-side IRPAs (ETEE) are implemented and tested. The primary objectives of the Parry Sound Pilot Project are to develop an understanding of how ETEE programs impact peak hour flow/demand and to develop an understanding of how to design, deploy, and evaluate ETEE programs.
4. The Southern Lake Huron Pilot Project proposes to implement a suite of ETEE programming for residential, commercial and industrial customers in the City of Sarnia and the Town of Plympton-Wyoming, including an enhanced version of existing of DSM offerings with an increased focus on the commercial and industrial sector, as well as a residential DR program. Enbridge Gas also proposes to implement a supply-side IRPA as part of the Southern Lake Huron

Pilot Project: CNG injection, to defer the system need during the Pilot Project term. The supply-side IRPA will ensure that Enbridge Gas can reliably meet system demand requirements (peak hour) while demand-side IRPAs (ETEE and DR) are implemented and tested. The primary objectives of the Southern Lake Huron Pilot Project are to develop an understanding of how ETEE programs and DR programs impact peak hour flow/demand and to develop an understanding of how to design, deploy, and evaluate ETEE and residential DR programs.

5. Both Pilot Projects are proposed to be implemented with a term of 2023-2027, subject to the timing of receipt of a Decision and Order of the OEB approving the associated IRP Plans and their respective cost consequences (including accounting treatment). Enbridge Gas requests that the OEB issue its Decision and Order on the current Application by December 31, 2023, to allow sufficient time to develop, market and implement the demand-side programs in the Pilot Project areas in 2024 (see the proposed implementation schedule at Exhibit D, Tab 1, Schedule 1 and 2 for further detail). As described in Exhibit D, the Company requires at least four months, from the receipt of a Decision and Order of the OEB, to implement ETEE programming in the market. Additionally, the Company cannot commence with procurement of hourly metering devices for commercial and industrial customers in the Southern Lake Huron Pilot Project area until such time that the OEB approves the cost consequences of the Pilot Projects.
6. For ease of reference and to assist the OEB with preparation of the notice of application for the IRP Pilot Projects, a map of each of the IRP Pilot Project areas is included as Attachment 1 to this Exhibit.
7. If the OEB determines that it will conduct a hearing for this application, then Enbridge Gas requests that it proceed by way of written hearing in English.

8. Pursuant to section 36 of the Act, Enbridge Gas requests an Order or Orders of the OEB approving the cost consequences of the IRP Plans for the IRP Pilot Projects and the proposed accounting treatment to record costs of the same in the IRP costs deferral accounts for later disposition and recovery.¹ Additional details regarding Pilot Project costs, accounting and economics are set out in Exhibit E. Enbridge Gas is not seeking approval for other IRP Plan components contemplated by the OEB's IRP Decision such as the cost-benefit test (i.e. DCF+), incentives related to IRP alternatives and attribution of savings between IRP and Demand Side Management activities. Enbridge Gas will include evidence and proposals related to these items as part of the first non-pilot IRP Plan application. Enbridge Gas believes these issues do not need to be adjudicated as part of the IRP Pilot application.
9. To accommodate for uncertainty and flexibility in the Pilot Project budget, Enbridge Gas notes its understanding that the 25% cost adjustment threshold, as noted in the OEB's IRP Framework Decision,² will be applicable to the Pilot Projects, such that Enbridge Gas is not required to seek approval for cost adjustments within 25% of the total proposed Pilot Projects budget. Enbridge Gas notes its expectation that it will have flexibility in the allocation of annual budgets between the years included in the pilot term of 2023-2027. This flexibility will allow Enbridge Gas to be responsive to learnings and feedback and allow for adjustments to the program design as necessary.
10. Enbridge Gas requests that copies of all documents filed with the OEB in connection with this proceeding be served on it and on its counsel, as follows:

¹ EB-2020-0091 OEB Decision and Accounting Order (September 2, 2021), Schedule A; Deferral Account No. 179-385 and 179-386.

² EB-2020-0091, July 22, 2021, Appendix A, P.21

- (a) The Applicant: Brittany Zimmer
Senior Advisor, Leave to Construct
Applications
- Address: P.O Box 2001
50 Keil Drive N
Chatham, ON
N7M 5M1
- Telephone: (519) 436-5442
- E-Mail: EGIRegulatoryProceedings@enbridge.com
brittany.zimmer@enbridge.com
- (b) The Applicant's counsel: David Stevens
Aird and Berlis LLP
- Address: Brookfield Place, P.O. Box 754
Suite 1800, 181 Bay Street
Toronto, ON
M5J 2T9
- Telephone: (416) 863-1500
- Fax: (416) 863-1515
- E-Mail: dstevens@airdberlis.com

DATED at the City of Chatham, Ontario this 19th day of July 2023.

ENBRIDGE GAS INC.

(Original Digitally Signed)

Brittany Zimmer,
Senior Advisor, Leave to Construct Applications

Exhibit C

From: Stephanie Allman
To: lisa@resilientlp.com; jonathan@resilientlp.com; don.richardson@sharedvaluesolutions.com; larry@anwaatin.com; david.butters@appro.org; tho@blg.com; jvellone@blg.com; marion.fraser@rogers.com; aengel@foglers.com; alex.greco@cme-mec.ca; spollock@blg.com; eb Blanchard@blg.com; alvin.chan@hamilton.ca; jgirvan@uniserve.com; tom.ladanyi@rogers.com; spainc@rogers.com; jack@cleanairalliance.org; kent@elsonadvocacy.ca; SRobinson@epcor.com; THesselink@epcor.com; docallaghan@epcor.com; drquinn@rogers.com; petercptthompson@outlook.com; dpoeh@eclaw.ca; kai@millyard.ca; cneme@energyfuturesgroup.com; regulatoryaffairs@ieso.ca; ian.mondrow@gowlingwlg.com; srahbar@igua.ca; randy.aiken@sympatico.ca; mgardner@willmsshier.com; judy@simon@jsimon.net; mvallani@willmsshier.com; mrb@mrb-law.com; f.arab@ontariogreenhouse.com; jvince@willmsshier.com; rjackiw@willmsshier.com; michael.brophy@rogers.com; wayne.mcnally@oesc-cseo.org; jay@shepherdbrubenstein.com; mark@shepherdbrubenstein.com; jaya.chatterjee@kitchener.ca; les.jones@kitchener.ca; namrita_sohi@tcenergy.com; matthew_wharton@tcenergy.com; jlawford@piac.ca; shelley.grice@rogers.com; Dikeos, John; dgordon@amo.on.ca; tamara.kuiken@dnv.com; cameron.leitch@enwave.com; cneme@energyfuturesgroup.com; drquinn@rogers.com; jay@shepherdbrubenstein.com; Poon, Kenneth; steven.norrie@ieso.ca
Subject: EB-2022-0335 - Enbridge Gas Inc. - Integrated Resource Planning (IRP) Pilot Projects Application - Notice of Hearing
Date: Friday, August 11, 2023 10:30:00 AM
Attachments: [EGI APPL 20230719.pdf](#)
[Notice EGI IRP Pilot Projects FR 20230808.pdf](#)
[Notice EGI IRP Pilot Projects EN 20230808.pdf](#)
Importance: High

Good afternoon,

On July 19, 2023, Enbridge Gas filed an Application with the OEB for an order or orders approving the cost consequences of Integrated Resource Planning ("IRP") Plans for IRP Pilot Projects in the Town of Parry Sound, and the City of Sarnia and Town of Plympton-Wyoming.

On August 8, 2023, the OEB issued the Notice of Hearing and the Letter of Direction for the proceeding. The OEB has directed Enbridge Gas to serve a copy of the Notice of Hearing, Enbridge Gas' Application and evidence on all intervenors in the Integrated Resource Planning Proposal (EB-2020-0091), and the Integrated Resource Planning Technical Working Group (EB-2021-0246).

Attached please find a copy of the OEB's Notice of Hearing along with Enbridge Gas's Application and evidence as filed with the OEB for this proceeding. A complete paper copy of the evidence filed in this proceeding is available upon request, or alternatively can be viewed on the Enbridge Gas website by accessing the link below and navigating to the "Other Regulatory Proceedings" tab.

<https://www.enbridgegas.com/about-enbridge-gas/regulatory>

Thank you,

Stephanie Allman

Regulatory Coordinator – Regulatory Affairs

ENBRIDGE GAS INC.

TEL: 416 753-7805 | FAX: 416 495-6072

500 Consumers Road North York, Ontario M2J 1P8

[enbridgegas.com](https://www.enbridgegas.com)

Integrity. Safety. Respect.



[Home](#) / [About Enbridge Gas](#)

Regulatory Information

Enbridge Gas is a regulated company through the Ontario Energy Board and Canada Energy Regulator. You can view all of our rate case information and evidence — as well as the evidence we filed in other regulatory proceedings. Please note that we have not posted any evidence that was confidential or that required a non-disclosure agreement.

[FRANCHISES](#)[OTHER REGULATORY PROCEEDINGS✓](#)[RATE CASES AND QRAM](#)

EB-2022-0335 - Integrated Resource Planning - IRP - Pilot Projects

► Application and Evidence

► Notice of Application