



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

August 14, 2023

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

Dear Ms. Marconi:

**Re: EPCOR Natural Gas Limited Partnership
Brockton Expansion – Leave to Construct Application
Ontario Energy Board File Number: EB-2022-0246**

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, Schedule B, as amended (the "OEB Act"), and in particular sections 90(1) and 97 thereof;

AND IN THE MATTER OF an application by EPCOR Natural Gas Limited Partnership for an order granting leave to construct natural gas distribution pipelines and ancillary facilities that make up a Community Expansion Project to expand service within the Municipality of Kincardine and the Township of Arran-Elderslie, and to bring natural gas service to areas within the Municipality of Brockton and the Municipality of West Grey.

**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 certificates of public convenience and necessity (CPCNs) allowing it to provide gas services to customers within the Municipality of Brockton (EB-2009-0089 and EB-2021-0269-G), the Municipality of West Grey (EB-2007-0818 and EB-2021-0269-H), the Municipality of Arran-Elderslie (EB-2018-0341), the County of Bruce (EB-2009-0047 and EBC 29) and the County of Grey (EB-2015-0263, EB-2008-0117 and EBC 32).
4. 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 Municipality of West Grey, the Municipality of Arran-Elderslie, the County of Bruce and the County of Grey are protected and they are only impacted to allow service to be provided to the customers specifically identified in the application.
5. In August 2020, EPCOR Natural Gas proposed a project to provide service to rural customers along the supply laterals which were proposed to be installed throughout the Municipality of Brockton as well as several smaller communities. On June 9, 2021, this originally proposed project was approved to receive \$20,340,000 in funding assistance under the Natural Gas Expansion Program (NGEP) pursuant to Ontario Regulation 451/21. Enbridge Gas understands that EPCOR Natural Gas has now modified the scope of the project originally approved for NGEP funding.

6. Upon review of the costs to extend our existing infrastructure to provide service to these customers and the assistance that EPCOR Natural Gas will be receiving through the NGEP, Enbridge Gas believes that, although we would like to connect these customers, it is most likely more economic and practical for EPCOR Natural Gas to attach these specific customers to their system.
7. Beyond the impact that this application could have on our CPCN rights within the County of Brant and the County of 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 Natural Gas 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. 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 14th day of August 2023.

ENBRIDGE GAS INC.

Patrick McMahon
Technical Manager, Regulatory Research and Records