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EB 2014 - 0261

OEB BOARD SECRETARY	
File No:	Sub File: 4
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November 17, 2014

VIA REGULAR MAIL

20/11/14

Attention: Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

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ONTARIO ENERGY BOARD

Dear Madam Secretary:

**RE: Union Gas Ltd. – Dawn Parkway 2016 Expansion Project – OEB File No. EB-2014-0261
REVISED GAPLO Intervention Request Letter – Our File No. 16776**

We are the lawyers for the Gas Pipeline Landowners of Ontario ("GAPLO"). Last Friday, we filed an intervenor request letter on behalf of GAPLO in the above noted proceeding. We have since discovered an error in that original letter and, therefore, have submitted the enclosed revised letter. Kindly please replace the originally filed letter with the new revised letter.

We trust this is satisfactory, and thank you for your assistance.

Yours truly,
SCOTT PETRIE LLP
LAW FIRM



John D. Goudy

Encl.

SV

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November 17, 2014

VIA ELECTRONIC FILING

Attention: Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Dear Madam Secretary:

**RE: Union Gas Ltd. – Dawn Parkway 2016 Expansion Project – OEB File No. EB-2014-0261
 GAPLO Intervention Request Letter – Our File No. 16776**

We are the lawyers for the Gas Pipeline Landowners of Ontario ("GAPLO") and are writing to request intervenor status and cost award eligibility in the above noted proceeding on its behalf.

GAPLO and its interest in this proceeding

GAPLO is a voluntary organization of landowners directly affected by Union Gas Ltd. pipelines and associated facilities. GAPLO has approximately 120 active members across Ontario. GAPLO and its members have an interest in ensuring that Union Gas Ltd.'s construction methodologies and environmental protection measures are held to the highest standards by the Board. GAPLO and its members also have an interest in ensuring that the form of landowner agreement to be approved by the Board pursuant to Section 97 of the *Ontario Energy Board Act* satisfactorily addresses, *inter alia*, the accommodation of farming practices and issues related to pipeline abandonment.

GAPLO has intervened previously in Board proceedings involving pipeline project approval applications (including EB-2010-0381, EB-2008-0411 and EB-2005-0550), but is not a frequent intervenor.

Nature and scope of GAPLO's intended participation

GAPLO-Union intends to participate actively in the proceeding by submitting interrogatories, evidence and argument. GAPLO requests that an oral hearing, preceded by a written discovery process and a

settlement conference, be held in this matter so that it will have the opportunity to cross-examine Union Gas Ltd.'s witnesses.

Request for written evidence

GAPLO requests that a copy of the written evidence upon which the Application is based be provided to its lawyers.

Cost award

GAPLO requests a determination by the Board that it is eligible for a cost award in this proceeding. GAPLO primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding (the interests of pipeline landowners) and its membership includes persons with an interest in land that is affected by Union Gas Ltd.'s application.

GAPLO contact

If intervenor status is granted to GAPLO as requested above, documents in this proceeding may be served on and delivered to GAPLO through its lawyer as follows:

Attention: John D. Goudy
Scott Petrie LLP
200-252 Pall Mall St.
London, ON N6A 5P6

Tel: (519) 433-5310, ext. 236
Fax: (519) 433-7909
Email: jgoudy@scottpetrie.com

We trust this is satisfactory and look forward to the Board's consideration of GAPLO's requests. Should you require any further information, please do not hesitate to email or call me.

Yours truly,

SCOTT PETRIE LLP
LAW FIRM



John D. Goudy

c.c.: Karen Hockin, Union Gas
Crawford Smith, Torys LLP