

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15, Schedule. B, as amended;

AND IN THE MATTER OF the Ontario Energy Board's
consultation to review Enbridge Gas Inc. Annual Update to
its 5-year Natural Gas Supply Plan.

EB-2024-0067

NOTICE OF INTERVENTION

THREE FIRES GROUP INC. AND MINOGI CORP.

April 30, 2024

A. Application for Intervenor Status

1. Three Fires Group Inc. ("**Three Fires**") and Minogi Corp. ("**Minogi**") hereby jointly seek to participate in the Ontario Energy Board's (the "**Board**") consultation to review Enbridge Gas Inc.'s ("**EGI**") Annual Update to its 5-year Natural Gas Supply Plan (the "**Consultation**"). This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure*.

B. Three Fires, Minogi, and Their Interest in the Proceeding

2. Three Fires is an Indigenous business corporation that represents the interests of Chippewas of Kettle and Stony Point First Nation ("**CKSPFN**").
3. Minogi is an Indigenous business corporation that represents the interest of Mississaugas of Scugog Island First Nation ("**MSIFN**", and, together with CKSPFN, the "**First Nations**").
4. CKSPFN is located in southern Ontario along the shores of Lake Huron, 35 kilometres from Sarnia, Ontario and has 1,000 members who live on-reserve and 900 who live off-reserve.
5. The Mississaugas of MSIFN moved into southern Ontario and settled in the areas around Lake Scugog from their former homeland north of Lake Huron around 1700. MSIFN is located on Scugog Island in the Port Perry area and has over 140 members.
6. The First Nations' Aboriginal and Treaty rights, land use, cultural heritage, and other rights and interests are potentially affected by the Consultation. The First Nations each have traditional territory, and associated rights and interests protected by the *Constitution Act, 1982*, that may be impacted by the outcomes of this proceeding.
7. Three Fires is an active intervenor representing the interests of the CKSPFN in EGI's rates application for the period beginning in January 2024 (EB-2022-0200), as well as in EGI's leave to construct applications (EB-2022-0086) and (EB-2022-0157), and in Hydro One Networks Inc.'s ("**HONI**") Chatham to Lakeshore transmission line leave to construct application (EB-2022-0140). CKSPFN was a Board-approved intervenor in HONI's affiliate transmission projects deferral account application (EB-2021-0169).

C. Nature and Scope of Three Fires' and Minogi's Intended Participation

8. Three Fires and Minogi may, if granted intervenor status in this proceeding, address the following:
- (i) the impact and consequences of EGI's submissions for Indigenous communities and Indigenous customers;
 - (ii) EGI's submissions relating to public policy matters, including those related to natural gas expansion and decarbonization;
 - (iii) EGI's submissions relating to the ongoing energy transition, including its use of energy alternatives such as renewable natural gas and hydrogen;
 - (iv) updates to EGI's demand forecasts as compared with its recent rebasing proceeding;
 - (v) the appropriateness of EGI's annual update in general; and
 - (vi) any other matters that promote or otherwise represent the interests of Three Fires, Minogi, and/or the First Nations more generally.
9. Three Fires and Minogi intend to be active participants in this proceeding and will act responsibly to coordinate with other intervenors, where common issues may arise and may be addressed. Their proposed joint intervention will seek to reduce duplications and support time and cost efficiencies.

D. Costs

10. Three Fires and Minogi hereby request cost eligibility in the Consultation. Three Fires and Minogi are, in accordance with s. 3.03(b) of the Board's *Practice Direction on Cost Awards*, eligible to seek an award of costs as they are each a party that primarily represents an interest or policy perspective that is relevant to the Board's mandate and to the proceeding.
11. Three Fires and Minogi represent the interests of a unique and otherwise unrepresented set of Indigenous energy consumers in Ontario and are committed to ensuring that they are served through access to an affordable, reliable, sustainable, and modern natural gas service. Three Fires and Minogi requests an award of costs in this proceeding on the basis that their comments and participation serve a direct interest and policy perspective that is relevant to the Board's mandate and pressing for Ontario's First Nation energy consumers.

The Board has granted Three Fires and CKSPFN cost eligibility in several Board proceedings, including each and all of those referred to above in paragraph 7.

E. Party Representatives

12. Three Fires and Minogi hereby requests that further communications with respect to this proceeding be sent to the following:

Reggie George

Three Fires Group Inc.
9119 W Ipperwash Rd Unit A,
Lambton Shores, ON N0N 1J3

Email: reggie.george@threefires.com

Don Richardson

Minogi Corp.
Mississaugas of Scugog Island First Nation,
Administration Building,
22521 Island Road,
Port Perry, ON L9L 1B6

Email: drichardson@scugogfirstnation.com

AND TO ITS COUNSEL

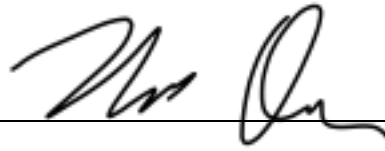
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119 Baby Point Road
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Attention: Lisa (Elisabeth) DeMarco
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Attention: Nicholas Daube
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ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS 30th day of April, 2024

A handwritten signature in black ink, appearing to read 'Nick Daube', is written over a horizontal line.

Nicholas Daube
Resilient LLP
Counsel for Three Fires and Minogi