

May 24, 2024

BY EMAIL AND FILED VIA RESS

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
EB-2024-0111 – 2024 Rebasing and IRM – Phase 2
Intervention Request from Minogi Corp.**

We represent Enbridge Gas.

On May 8, 2024, Minogi Corp. ("Minogi") filed a Notice of Intervention and Request for Cost Eligibility in this proceeding.¹ In the Notice of Intervention, Minogi explained why it did not participate in Phase 1 and explained that it will not seek to re-open any issues already determined.

Enbridge Gas does not object to Minogi's intervention request to participate from this point forward in the regulatory process, but proposes that Minogi's intervention should be combined with the existing intervention from Three Fires Group Inc. ("Three Fires") in this proceeding.² The parties are represented by the same law firm. On the face of the intervention request from Minogi, its areas of interest appear to be aligned with the areas that Enbridge Gas would expect to be also areas of interest for Three Fires.³ Enbridge Gas believes that a joint intervention is an opportunity for new parties to the proceeding to work with other parties with similar interests, thus creating efficiencies in the regulatory process. That is the approach that has been taken by these same two parties (Minogi and Three Fires) in the EB-2024-0067 proceeding to review Enbridge Gas's 2024 Annual Update to its 5-year Natural Gas Supply Plan.⁴ Both Enbridge Gas and the OEB accepted the joint intervention approach in that proceeding.

Of course, there may be facts or information of which Enbridge Gas is unaware that would indicate why a joint intervention is not appropriate in this Phase 2 Rebasing proceeding. If that's the case, then Enbridge Gas invites Minogi to explain in a responding submission why a joint intervention is not appropriate.

¹ <https://www.rds.oeb.ca/CMWebDrawer/Record/852038/File/document>

² Enbridge Gas presumes that there are more similarities between Three Fires and Minogi than between GFN and Minogi, given that GFN represents remote and near-remote Indigenous communities.

³ The Three Fires Notice of Intervention was filed in Phase 1:

<https://www.rds.oeb.ca/CMWebDrawer/Record/763270/File/document>

⁴ <https://www.rds.oeb.ca/CMWebDrawer/Record/850984/File/document>

Please let us know if you have any questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

c: all parties in EB-2024-0111