



February 18, 2025

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

email: natalya.plummer@oeb.ca

Re: File EB-2024-0342 - Enbridge Gas Inc. Application for a New Certificate of Public Convenience and Necessity for Tay Valley Township

Dear Ms. Nancy Marconi,

I am writing to respond to the Board's procedural order and the recent correspondence from Enbridge Gas and Environmental Defence.

The Township asks that the Board allow Environmental Defence to submit evidence and intervene in this case. Environmental Defence indicated that it would file evidence on "whether the approval is in the public interest and in ratepayers' interests in light of the financial risks and climate risks arising from the approval". The Township would like to review this evidence, may wish to rely on this evidence, and believes this evidence should be considered.

The Township is not represented by counsel in this matter and accordingly, we suggest that the participation of an intervenor such as Environmental Defence that has experience before the Board and is represented by counsel would be of assistance. For example, Environmental Defence has suggested an interrogatory process that may illuminate what "necessity" Enbridge has identified, if any. We do not understand how a certificate of public convenience and "necessity" can be seen as necessary in the absence of evidence being provided that demonstrates a need to provide gas service in the proposed expanded area.

The Board's procedural order asked for details regarding the evidence that the Township would like to submit. The Township would like to submit documents relating to the Township's consistent opposition to expansion of the gas grid in the Township. This would primarily consist of Township documents such as the Climate Change Action Plan, the Climate Crisis Declaration, and Council resolutions. If Environmental Defence

will not be allowed to submit evidence on the financial and climate risks relating to gas grid expansion, the Township requests an opportunity to submit, or request to submit, additional evidence related to the Township's opposition to expansion of the gas grid in the Township.

In my previous letter, I indicated that the Township would prefer to participate in an oral hearing. However, the Township is open to the possibility that a written hearing may be sufficient. The Township asks that the decision between an oral and written hearing be made later in the process and that the parties be able to make submissions on whether an oral hearing is needed after the evidence and the next steps are clearer.

Enbridge Gas states that this is "a straightforward administrative request to align the existing CPCN with current municipal boundaries." The Township does not agree. Enbridge Gas is asking to expand the area in which it is allowed to expand its gas grid within the Township even though this does not accord with the Township's position on gas grid expansion. This is not an administrative request or a straightforward request. Before the OEB decides how to characterize this request or defines the scope of this hearing, the Township asks for an opportunity to provide points for the OEB's consideration on those important questions.

If you have any questions regarding the above, please contact Noelle Reeve at 613-267-5353 ext. 128 or email planner@tayvalleytp.ca.

Sincerely,



Rob Rainer, Reeve

cc. Patrick McMahon, Technical Manager, Regulatory Research and Records, Enbridge
patrick.mcmahon@enbridge.com