



39 Beech St
Aylmer, Ontario
Canada
epcor.com

April 8, 2025

Sent by EMAIL, RESS e-filing

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

Dear Ms. Marconi:

Re: EB-2024-0239 EPCOR Natural Gas Limited Partnership ("ENGLP") Application for a Limited Certificate of Public Convenience and Necessity for Norfolk County Response Clarification

Please find enclosed ENGLP's reply to the OEB Staff's additional clarification questions received on March 27, 2025.

Please do not hesitate to contact me if you have any questions.

Yours truly,

Tim Hesselink, CPA
Senior Manager, Regulatory Affairs
EPCOR Natural Gas Limited Partnership
thesselink@epcor.com
249-225-5104

Response to OEB Staff's questions 1, 2 and 3:

Section 8(1) of the *Municipal Franchises Act* applies insofar as ENGLP requires approval of a limited CPCN prior to taking ownership of the New Pipeline.

Construction of the New Pipeline (as defined in the CPCN application) is the most economically efficient way to serve EZ Grow's future natural gas supply requirements. If Clearbeach did not have excess capacity, costly system upgrades would be required to ENGLP's system, and would not be able to be completed in a timely manner. Taking advantage of Clearbeach's excess capacity requires facilities being built within Enbridge's CPCN territory in Norfolk County.

Because this arrangement involves one rate-regulated utility owning a limited purpose asset within another rate-regulated utility's CPCN territory, ENGLP is of the view that all stakeholders (Enbridge, ENGLP, and the OEB) benefit from ENGLP applying for and receiving a limited purpose CPCN – so that the location and purpose of gas distribution assets in the region are clearly understood.

All of which is respectfully submitted.