

May 22, 2025

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: Enbridge Gas Inc.  
Application for Approval of Franchise Agreement and New CPCN  
Township of Lanark Highlands  
Ontario Energy Board File No. EB-2025-0091**

Further to the questions submitted by Ontario Energy Board Staff related to the history of the Township of Lanark Highlands and related CPCN rights, Enbridge Gas provides the following responses.

**Staff Question-1**

**Reference:** Application page 1, paras 3 and 4  
Application page 3, para 14

**Preamble:**

On May 14, 1997, the former Townships of Lavant, Dalhousie and North Sherbrooke and the former Village of Lanark were amalgamated to form the Township of North West Lanark. On July 1, 1997, the former Township of Darling and the former Township of North Lanark were amalgamated with the former Township of North West Lanark to form the Township of Lanark Highlands. Enbridge Gas has applied for an order approving a certificate of public convenience and necessity for the Township of Lanark Highlands.

**Questions:**

- a) Please discuss whether Enbridge Gas has certificate rights for any of the former municipalities that formed the Township of Lanark Highlands.
- b) Please explain whether Enbridge Gas has any natural gas infrastructure in the geographic area of any of the former municipalities that formed the Township of Lanark Highlands. If so, please also explain why Enbridge Gas did not previously apply for a certificate for the Township of Lanark Highlands or its predecessor municipalities.
- c) Please confirm that the proposed certificate does not overlap with any other person's certificate. Please also confirm that Enbridge Gas's certificate request is for the entire geographic area of the Township of Lanark Highlands and is not limited to serve the community of Lanark. If Enbridge Gas is requesting a limited certificate, please file a map

that outlines the metes and bounds of the requested certificate area (on-form-to) and the general location of any customers to be served therein

**Response:**

- a) Enbridge Gas is not aware of ever having CPCN rights for any of the former municipalities that formed the Township of Lanark Highlands.
- b) As illustrated at Schedule A of the application, Enbridge Gas does not currently have any natural gas infrastructure in the Township of Lanark Highlands.
- c) As noted in the Application, Enbridge Gas is not aware of any other natural gas distributor in the area, so we have no knowledge of any CPCNs which could be overlapped.

Enbridge Gas confirms that the CPCN request in this Application is for the entire geographic area of the Township of Lanark Highlands to coincide with the OEB's long-standing policy of ensuring that CPCNs match municipal boundaries. In recent CPCN decisions, the OEB has noted that issuing new CPCNs that are geographically aligned with municipal borders is consistent with the intent of the OEB that the CPCN holders update service areas if boundaries of their existing CPCNs are affected by municipal amalgamations, annexations or name changes.<sup>1</sup> This position is supported by the guidance in the Natural Gas Facilities Handbook to notify the OEB of any change to municipal boundaries in order to have CPCNs amended to reflect any change.<sup>2</sup>

**Staff Question-2**

**Reference:** Application page 1, para 3

**Preamble:**

The Township of Lanark Highlands is referred to as a single-tier municipality in the application.

**Question:**

- a) Please confirm that the reference to the Township of Lanark Highlands in the application should state that the Township of Lanark Highlands is a lower-tier municipality.

**Response:**

- a) Confirmed.

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<sup>1</sup> See OEB Decisions and Orders issued in [EB-2024-0339](#), [EB-2024-0294](#), [EB-2023-0239](#) and [EB-2023-0146](#).

<sup>2</sup> [Natural Gas Facilities Handbook | Ontario Energy Board](#)

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

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