

**REPLY TO:** Nicholas Daube  
ndaube@woodwardandcompany.com  
Toronto Office

**ASSISTANT:** Fatima Raeese  
fraeese@woodwardandcompany.com

File #6854

June 19, 2025

*Via email*

Ontario Energy Board  
[registrar@oeb.ca](mailto:registrar@oeb.ca)  
2300 Yonge Street, 27th Floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

**Attention: Ontario Energy Board, Registrar**

Dear Ms. Marconi,

**Re: EB-2025-0065 Enbridge Gas Inc., Five-Year Gas Supply Plan Intervention Request**

We are writing on behalf of Ginoogaming First Nation ("GFN") to request late intervention and cost award eligibility in this proceeding.

GFN believes that it did not receive the Notice of Hearing and was consequently unaware of the deadlines to indicate a continuing interest in this proceeding. GFN first became aware of the deadlines following the circulation of Procedural Order No. 1 and the receipt of a letter from counsel to Canadian Manufacturers & Exporters, which raised similar administrative concerns to the ones GFN believes it has encountered.

GFN has previously engaged in this proceeding, having participated in the related stakeholder session on May 15, 2025. Likely for that reason, GFN is listed in Schedule A to Procedural Order No. 1 among the various intervenors and participants for this proceeding.

**GFN's Interest in This Proceeding**

GFN is an Anishnawbe First Nation located in Northern Ontario, located approximately 40 km east of Geraldton, Ontario, Canada, on the northern shore of Long Lake, immediately south of Long Lake 58 First Nation and the community of Longlac, Ontario.

GFN is within the boundaries of James Bay Treaty No 9 made in 1905 and was officially created through signing an adhesion to this Treaty on August 9, 1906. It is a member of the Nishnawbe Aski

**VICTORIA OFFICE:**

200 – 1022 Government Street  
Victoria, BC V8W 1X7

**TORONTO OFFICE:**

181 University Avenue, Suite 2200  
Toronto, ON M5H 3M7

\*Denotes a Law Corporation

^Denotes a ULC

Tel: 250-383-2356; Fax: 250-380-6560  
woodwardandcompany.com

Nation, a political territorial organization representing 49 First Nations in northern Ontario and Matawa First Nations Management, a tribal council providing a variety of advisory services/programs to 8 First Nations in James Bay Treaty No. 9 and 1 First Nation in the Robinson-Superior Treaty.

GFN's interest in the proceeding is focused on ensuring that GFN and its members have access to efficient and reliable natural gas transmission and distribution in order to meet basic needs and facilitate economic development.

GFN also wishes to ensure that the interests of First Nations are adequately represented in this proceeding. GFN and its members 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. GFN also has a long history of involvement in EGI proceedings and continues to work with EGI and representatives of the OEB to remedy the historic underrepresentation of Indigenous interests in OEB proceedings and Ontario's energy sector more broadly.

Furthermore, GFN represents a set of interests and perspectives as a First Nations community in Ontario's north. It is in a position to raise questions and address issues from the perspective of a more remote community that faces distinct climate realities and related energy needs.

GFN's participation would therefore provide a strong Indigenous perspective, including experience and input on issues including the potential impacts on Indigenous rights that may be implicated in this proceeding.

GFN's focus in this proceeding will be on the impact of the Gas Supply Plan for GFN's members as well as for First Nations more broadly. EGI's approach to public policy and the integration of those considerations are of particular relevance to GFN, since they influence the extent to which, among other things, climate considerations, climate risk mitigation, or considerations relating to reconciliation form part of EGI's proposed approach.

Furthermore, GFN wishes to engage on the matters addressed in the OEB's Staff Report reviewing Enbridge Gas Inc.'s 2024 Annual Update, which was endorsed by the Board. The Staff Report indicated that the current proceeding would offer an opportunity for the Board to consider whether the concerns of First Nations should be addressed in Annual Updates, including concerns regarding EGI's approach to consultations in advance of these proceedings, as well as concerns relating to the energy transition such as the risk of stranded assets.

Finally, GFN expects that it will engage on questions relating to the reliability and cost-effectiveness of energy supply in the north of Ontario, given GFN's position as a remote community.

GFN intends to coordinate with other intervenors where common issues may arise and may be addressed. GFN intends to request information, submit written interrogatories, test evidence, and provide submissions, all in the normal course.

### **Eligibility for Cost Recovery**

GFN requests an award of costs in this matter on the basis that its comments and participation serve a direct interest and policy perspective that is relevant to the Board's mandate and pressing

for Ontario's energy consumers. GFN represents the interest of a unique and otherwise unrepresented set of First Nation energy consumers in Ontario and is committed to ensuring that they are served through access to an affordable, reliable, sustainable and modern natural gas service.

The Board has granted GFN cost eligibility in several Board matters and proceedings previously, including most recently as an intervenor in Enbridge Gas Inc.'s rate rebasing application, which originally bore the proceeding number EB-2022-0200, as well as many other matters and proceedings as a member of Anwaatin Inc.

**Concluding Remarks**

GFN apologizes for any inconvenience its late request may produce. GFN believes that granting GFN late intervention will not prejudice the conduct of or any other party to the proceeding, since the proceeding remains at its very earliest stages.

Yours sincerely,

Nicholas Daube