



Enbridge Gas Inc.  
50 Keil Drive North  
Chatham, Ontario, Canada  
N7M 5M1

June 19, 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 Certificate of Public Convenience and Necessity  
Unorganized Township of Matheson  
Ontario Energy Board File No. EB-2025-0099**

Further to the questions submitted by Ontario Energy Board Staff related to the history of CPCNs in the unincorporated area, Enbridge Gas provides the following response.

**Staff Question-1**

**Reference:** Application, Page 1, Para 3  
Application, Page 2, Para 7  
Application, Page 3, Para 15

**Preamble:**

Enbridge Gas has applied for an order approving a new certificate for the Unorganized Township of Matheson.

Enbridge Gas states “In an application submitted in 2017 (EB-2017-0367), Union Gas Limited requested an Order cancelling and superseding the existing Certificates of Public Convenience and Necessity (CPCNs) held by Union Gas for the former municipalities within the Township of Black River-Matheson and replacing them with a single CPCN for the amalgamated Township of Black River-Matheson.”

Enbridge Gas also states “After the EB-2017-0367 Decision and Order was issued, the Township of Black River-Matheson contacted Union Gas to say that the municipal boundaries were not accurate on the map included in the Decision. As a result, Union Gas revised the map and sent it to the OEB to get the Decision amended. What was not specified by Union Gas at that time was that the Decision should have been amended to reinstate the CPCN (E.B.C. 39) for the Unorganized Township of Matheson since it was outside of the municipal boundaries of the Township of Black River-Matheson.”

**Questions:**

- a) Please explain whether Enbridge Gas has any natural gas infrastructure in the Unorganized Township of Matheson and whether Enbridge Gas has constructed any natural gas infrastructure in the Unorganized Township of Matheson since 2018.
- b) Please discuss why Enbridge Gas did not apply for a new certificate for the Unorganized Township of Matheson in 2018 or at an earlier date.
- c) Please confirm that the proposed certificate does not overlap with any other person's certificate.

**Response:**

- a) As indicated in the map at Schedule A of the Application, there is distribution pipe that was constructed within the boundaries of the Unorganized Township of Matheson. All of this pipe was constructed / installed in 1959 and appears to have been put in place to provide service to a mining operation at the northern end of the installed pipe. There has not been any pipe added within the Unorganized Township of Matheson since this original 1959 installation.
- b) Prior to the OEB issuing the Decision and Order dated March 1, 2018 in the EB-2017-0367 proceeding addressing the franchise agreement with and the CPCN for the Township of Black River-Matheson, Enbridge Gas was maintaining all infrastructure located within the Unorganized Township of Matheson pursuant to rights granted through the E.B.C. 39 CPCN. At the time of the EB-2017-0367 Decision and Order, Enbridge Gas was undertaking a review of the mapping systems of the former Union Gas and Enbridge Gas Distribution in advance of discussions of a future merger of the two utilities. Other than priority work taking precedent, there are no other reasons why it wasn't until April 2022 that Enbridge Gas reached out to OEB Staff for guidance on how to reverse the OEB's inadvertent cancellation of the E.B.C. 39 CPCN. OEB Staff did not respond to our outreach until January 15, 2025 (see Attachments 1 and 2 for the email exchange with OEB Staff). Enbridge Gas began preparing the current application soon after hearing back from OEB Staff earlier this year.
- c) Confirmed. Enbridge Gas is not aware of any other person or entity holding CPCN rights within the Unorganized Township of Matheson.

**Staff Question-2**

**Reference:** EB-2024-0274 - Enbridge Gas Response to OEB Staff Questions, December 6, 2024

**Preamble:**

In the franchise proceeding for the County of Dufferin, in its response to OEB staff questions about any large scale reviews that have conducted to ensure that Enbridge Gas is not operating in any other parts of Ontario without a certificate/franchise, Enbridge Gas stated that "Other than the application submitted regarding a new certificate of public convenience and necessity (CPCN) for the City of Ottawa (which addresses areas of the City of Ottawa in which pipe has been constructed without CPCN rights in place), Enbridge Gas is not aware of any other areas where we are operating without the required franchise agreement and CPCN rights in place."

**Questions:**

- a) Please discuss whether Enbridge Gas has identified any other municipalities in Ontario where it is operating without a certificate/franchise and whether applications have been filed for those municipalities.
- b) Please discuss what measures that have been put in place to verify that Enbridge Gas is not operating without a certificate/franchise in any other parts of Ontario.

**Response:**

- a) As part of a longer term program to enhance and harmonize our mapping systems, efforts continue to investigate locations in municipalities and unincorporated areas where facilities may be located outside areas covered by our existing CPCNs and franchise agreements. When such areas are confirmed, franchise agreement and/or CPCN applications will be submitted to the Ontario Energy Board. At this time, no such applications are being prepared but our investigations continue.
- b) In 2022, following the release of the OEB's Natural Gas Facilities Handbook, Enbridge Gas enlisted the help of an outside consultant to review existing CPCNs and identify any that may require updates due to municipal boundaries being changed since the CPCNs were issued. This review was completed at the end of December 2022 and resulted in an increase of CPCN update applications to the OEB starting in 2023 which has continued into 2024 and 2025.

For every franchise agreement renewal occurring in 2023 and beyond, Enbridge Gas has undertaken more extensive reviews of municipal boundary changes that have impacted not only the municipality for which the franchise agreement is associated, but also other municipalities that have been impacted by the annexations identified. This has resulted in additional CPCN update applications in 2024 and 2025. These more comprehensive reviews include an evaluation of existing pipe that goes outside the subject municipality's boundaries to ensure that all required franchise agreement and CPCN rights are in place.

Efforts continue to enhance the franchise agreement and CPCN information within our mapping systems to ensure that project planning groups have all information available when developing projects. If issues are identified, Enbridge Gas' mapping system can be updated with identifiers around areas under review. Enbridge Gas continues to update its mapping systems in order to prevent any construction in areas not currently covered by a franchise agreement and CPCN where required.

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

Yours truly,

Patrick McMahon  
Technical Manager  
Regulatory Research and Records  
[patrick.mcmahon@enbridge.com](mailto:patrick.mcmahon@enbridge.com)  
(519) 436-5325

Attach.

**From:** [Patrick McMahon](#)  
**To:** [Richard Lanni](#)  
**Cc:** [Catherine Nguyen](#)  
**Subject:** CPCN - Unorganized Township of Matheson  
**Date:** Thursday, April 7, 2022 2:42:00 PM  
**Attachments:** [Schedule A - Black River Matheson Customer Density.pdf](#)  
[2018 05 08 - OEB Letter and Amended Decision to Reflect Updated Map \(EB-2017-0367\).pdf](#)  
[EBC 39 - Certificate - Unorganized Township of Matheson \(July 27, 1965\).pdf](#)

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On January 1, 1969, the former Township of Black River and the former Township of Matheson were amalgamated to form the Township of Black River-Matheson. On January 1, 1973, the former Township of Playfair was incorporated into the Township of Black River-Matheson.

In an application submitted in 2017 (EB-2017-0367), Union Gas requested an Order “cancelling and superseding the existing Certificates of Public Convenience and Necessity held by Union Gas Limited for the former municipalities within the Township of Black River-Matheson and replacing them with a single Certificate of Public Convenience and Necessity for the amalgamated Corporation of the Township of Black River-Matheson”.

At the time of the EB-2017-0367 application, Union Gas held Certificates of Public Convenience and Necessity for the former Town of Matheson (FBC 30 dated April 20, 1956), the former Township of Black River (FBC 35 dated April 20, 1956), the former Township of Playfair (FBC 36 dated April 20, 1956) and the Unorganized Township of Matheson (EBC 39 dated July 27, 1965) granting Union the right to construct works to supply natural gas within the said municipalities and the unorganized area.

It appeared in the application (and was assumed by the OEB) that the Unorganized Township of Matheson was now included within the Township of Black River-Matheson. The original application included a map that showed the Unorganized Township of Matheson being within the municipal boundaries of the Township of Black River-Matheson.

After the EB-2017-0367 Decision and Order was issued on March 1, 2018, the Township of Black River-Matheson contacted Union Gas to say that the municipal boundaries were not accurate on the map included in the Decision so Union Gas revised the map and sent it to the OEB to get the Decision amended. What was not specified was that the Decision should have been amended to reinstate the CPCN for the Unorganized Township of Matheson (EBC 39) since it was outside of the municipal boundaries of the Township of Black River-Matheson.

On May 8, 2018, the OEB amended the EB-2017-0367 Decision and Order but only by changing the map and not the content of the Decision so the CPCN for the Unorganized Township of Matheson (EBC 39) is still officially cancelled.

We have been reviewing our mapping system and discovered that we don't have a CPCN in place for the Unorganized Township of Matheson and the plant that we currently have in place that was covered under EBC 39.

**How should we address his issue?**

**Is this considered an administrative error that could be corrected pursuant to Rule 41.02 of the Rules of Practice and Procedure which allows for corrections to errors or do we need to submit an application for a CPCN for the Unorganized Township of Matheson?**

Pat

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**Patrick McMahon**

Technical Manager, Regulatory Research and Records

*ENBRIDGE GAS INC.*  
Tel: 519-436-5325

50 Keil Drive North, Chatham, ON N7M 5M1

[enbridgegas.com](http://enbridgegas.com)

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**From:** [Catherine Nguyen](#)  
**To:** [Patrick McMahon](#); [Richard Lanni](#)  
**Cc:** [Natalya Plummer](#)  
**Subject:** [External Approved] RE: CPCN - Unorganized Township of Matheson  
**Date:** Wednesday, January 15, 2025 2:48:47 PM

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Hi Pat,

Apologies, your original email was missed on our end. We have discussed internally and OEB staff are of the view that this would be better addressed through a new application for a certificate.

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**From:** Patrick McMahon <Patrick.McMahon@enbridge.com>  
**Sent:** Wednesday, January 8, 2025 1:42 PM  
**To:** Richard Lanni <Richard.Lanni@oeb.ca>  
**Cc:** Catherine Nguyen <Catherine.Nguyen@oeb.ca>; Natalya Plummer <Natalya.Plummer@oeb.ca>  
**Subject:** Re: CPCN - Unorganized Township of Matheson

**CAUTION EXTERNAL EMAIL:** This email originated from outside of the OEB email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm following up on this one. I don't have a record of any reply from the OEB.

Pat

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**Patrick McMahon**  
Technical Manager, Regulatory Research and Records

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50 Keil Drive North, Chatham, ON N7M 5M1

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**From:** Patrick McMahon  
**Sent:** Thursday, April 7, 2022 2:43 PM  
**To:** Richard Lanni <[Richard.Lanni@oeb.ca](mailto:Richard.Lanni@oeb.ca)>  
**Cc:** Catherine Nguyen <[Catherine.Nguyen@oeb.ca](mailto:Catherine.Nguyen@oeb.ca)>  
**Subject:** CPCN - Unorganized Township of Matheson

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January 1, 1973, the former Township of Playfair was incorporated into the Township of Black River-Matheson.

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**Patrick McMahon**

Technical Manager, Regulatory Research and Records

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