Enbridge Gas Inc. 3840 Rhodes Drive P.O. Box 700 Windsor, ON N9A 6N7 Canada

June 26, 2025

VIA EMAIL and RESS

NBRIDGE

Ritchie Murray Acting Registrar Ontario Energy Board 2300 Yonge Street, 27th floor P.O. Box 2319 Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

Re: Enbridge Gas Inc. ("Enbridge Gas" or the "Company")
Ontario Energy Board ("OEB") File No.: EB-2025-0073
Mississauga Reinforcement Project (the "Project")
Intervenor Status Request - Response of Enbridge Gas

This letter is the response of Enbridge Gas to the June 23, 2025 intervention request letter ("Request") filed in the above-noted proceeding by Mr. Quinn on behalf of the Federation of Rental-housing Providers of Ontario ("FRPO").

The OEB should deny the Request as it fails to demonstrate any substantial interest in this proceeding, as further explained below.

Rule 22 of the *OEB's Rules of Practice and Procedure* ("Rules") reads:

22.02 The person applying for intervenor status must satisfy the OEB that he or she has a substantial interest and intends to participate responsibly in the proceeding. A person has a substantial interest if they have a material interest that is within the scope of the proceeding; for example, a person that: (i) primarily represents the direct interests of consumers (e.g., ratepayers) in relation to services that are regulated by the OEB; (ii) primarily represents an interest or policy perspective relevant to the OEB's mandate and to the proceeding; or (iii) has an interest in land that is affected by the proceeding. Examples of participation include participating in discovery, making submissions, and filing evidence.

To support an intervention request and satisfy the obligation incumbent on an intervenor to demonstrate they have a substantial interest in a proceeding, intervenors are required to complete an intervention request form and respond to specific questions as set out in Appendix A to the Rules.

FRPO has not completed an intervention request form and has only filed the Request that provides a brief description of FRPO as an advocate for over 800 private rental housing providers in Ontario that supports "a competitive marketplace that offers choice

and affordability in the provision of energy services." Mr. Quinn does not provide any information about how FRPO is materially impacted by the proceeding, the specific issues that are expected to be the subject of the intervention and how those issues may be relevant. The Request does not satisfy the OEB's intervenor process and does not meet the OEB's substantial interest test.

Simply put, FRPO's mandate, objective, and issues do not rise to the level of a "substantial interest" in this proceeding. In this regard, Enbridge Gas notes:

- There will be no impacts to the private sector housing service providers and property managers that FRPO represents as the project is fully supported by Petro-Canada Lubricants Inc., CRH Canada Group Inc., and CertainTeed Canada Inc. ("Customers") and will not result in additional costs borne by existing ratepayers¹.
- The Customers are not residential; they are industrial customers with existing Large Volume Distribution Contract Rate natural gas services from Enbridge Gas supporting their facility operations, which involve the production of lubricants, cement, and building materials². The Customers have also executed service contracts³ to underpin the new services they are requesting.
- Mr. Quinn has not indicated what interest or policy perspective FRPO may represent that would be relevant to this proceeding for Enbridge Gas to provide the requested service to the Customers.
- Mr. Quinn has also not indicated that FRPO has any interest in the land that is affected by the proceeding.

For these reasons, Enbridge Gas urges the OEB to reject the Request. In addition to not meeting the OEB's own standards for intervention, it is evident that granting the Request would not be cost effective, efficient, or in the public interest for this proceeding.

Please contact me if you have any questions.

Yours truly,

Evan Tomek

Evan Tomsk

Senior Advisor, Regulatory Applications – Leave to Construct

Cc: Tania Persad (Enbridge Gas Legal Counsel)
Arend Wakeford (Enbridge Gas Legal Counsel)
Judith Fernandes (OEB Case Manager)
Dwayne R. Quinn (Dr. Quinn & Associates Ltd.)

¹ Exhibit E, Tab 1, Schedule 1, para. 7.

² Exhibit B, Tab 1, Schedule 1, para. 2.

³ Exhibit B, Tab 1, Schedule 1, Attachments 12 – 14.