



From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Friday, May 1, 2026 2:45 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: llegate@regionofwaterloo.ca
Subject: Intervention Form: EB-2026-0009 - The Regional Municipality of Waterloo

Intervention Form

Case Number:

EB-2026-0009

Requesting information on behalf:

Of an organization

Intervenor Name:

The Regional Municipality of Waterloo

Mandate and Objectives:

The Regional Municipality of Waterloo (the “Region”) is an upper-tier municipality in the Province of Ontario. Its role is statutorily prescribed by the Municipal Act, 2001.

Membership of the Intervenor and Constituency Represented:

The Region is located in the Southwestern region of Ontario, to the West of the Greater Toronto Area and has an estimated population of more than 678,170.

Programs or Activities Carried Out by the Intervenor:

The Region delivers its statutory responsibilities under the Municipal Act, 2001, including the management of public property and assets such as highways and other infrastructure. The interpretation of the Model Franchise Agreement (“MFA”) carries significant potential cost implications for the Region, prompting the need for amendments that improve clarity and

certainty. The Region places great importance on ensuring efficient implementation of contractual terms between the parties to the MFA, efficient use of its lands and limiting financial exposure for assets that the Region does not own. Additionally, gas utility company's occupation of Region owned lands must occur within increasingly limited public space, both above and below ground, where municipal rights of way are already heavily used to support water systems, utilities, telecommunications, natural gas, and transit infrastructure. The generic proceeding also affects the Region's broader economic, social, and environmental policy objectives, including efforts to reduce reliance on fossil fuel infrastructure and decarbonize Regional systems and assets in alignment with federal and provincial GHG emissions reduction targets.

Governance Structure:

The Region, as an upper-tier municipality, has been pre-authorized by its Council to seek amendments to the Model Franchise Agreement. The Region's representatives are employees of the Region and will act from the authority granted to them by Council, however, the Region respectfully reserves the right to retain external counsel to represent it in this matter at any point of the proceedings. Area Municipalities within the Region of Waterloo are: The cities of Cambridge, Kitchener, Waterloo, and the townships of North Dumfries, Wellesley, Wilmot and Woolwich.

Representatives:

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Cost Claim Filing contact:

Liam Legate
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Other Contacts:

Frequent Intervenor Form:

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

N/A

Names and email addresses of individuals to be added as contacts for this proceeding:

N/A

OEB Proceedings:

Item Description	Category	Status
EB-2025-0327	Natural Gas – Rates	Granted

Issues:

As a party to the MFA, the Region is directly affected as both a signatory to the MFA and as the owner of lands where gas utility company's infrastructure is or may be located, and the terms that govern such occupation. The Region anticipates that the following issues from the Draft Issues List listed in the Notice of Hearing will be heard:

- Section 11 Alternative Easement: Are changes required to the provisions in section 11 of the Model Franchise Agreement pertaining to notice, the availability of easements and cost sharing in the event of the proposed sale or closing of any highway or any part of a highway where there is a gas line in existence?
- Section 12 Pipeline Relocation: Are changes required to the cost-sharing provisions as between municipalities and utilities in section 12 of the Model Franchise Agreement relating to the costs associated with pipeline relocations? Are changes required in relation to the time requirements for the completion of relocation under section 12 (e.g., should a time be specified)? If so, what would be an appropriate amount of time?
- Section 15 Disposition of the Gas System & Section 16 Use of Decommissioned Gas System: Are changes required in section 15 and section 16 of the Model Franchise Agreement relating to the removal of decommissioned pipelines?
- Non-substantive administrative updates to the Model Franchise Agreement: What terminologies (e.g., job titles) in the Model Franchise Agreement require an update to reflect current operations?
- Implementation of possible updates to the Model Franchise Agreement: If changes to the Model Franchise Agreement are made, how should the updated terms affect existing gas franchise agreements and applications currently before the OEB (e.g., how and when should The Region reserves the right to raise any other issues that may come to light in advance of the hearing. As set out in the Notice of Hearing, the Region awaits information from the OEB with respect to how it may comment on these draft issues and potentially make submissions for potential additional issues added to the final issues list.

Policy Interests:

The Region represents the best interests of its residents and the amendments it seeks are intended to address: • Efficient operation and management of Regional lands and infrastructure; • Cost certainty with regard to the application of cost sharing provisions of the MFA; and • Capacity to manage aging gas utility infrastructure in the new MFA; The Region intends to make policy submissions as to why the current form of the MFA requested is not in the best interest of the public.

Hearings:

The Region's preference would be for a hybrid hearing to allow for both written and oral hearings as this would allow for a flexible approach.

Evidence:

The Region is unable to address this question as of the date of this submission.

Coordination with Other Intervenors:

The Region has already held, and intends to continue to have, discussions with other municipal intervenors in order to coordinate submission to avoid duplication of effort.

Cost Awards:

As noted in the Notice of Hearing and the exception pursuant to section 3.07 of the Practice Direction on Cost Awards to allow municipalities to claim costs, the Region reserves the right to claim costs.

Language Preference:

None