



From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Tuesday, May 5, 2026 4:24 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: matthew.irish@guelph.ca
Subject: Intervention Form: EB-2026-0009 - The Corporation of the City of Guelph

Intervention Form

Case Number:

EB-2026-0009

Requesting information on behalf:

Of an organization

Intervenor Name:

The Corporation of the City of Guelph

Mandate and Objectives:

The City is a single-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 City of Guelph is located in the Southwestern region of Ontario, to the West of the Greater Toronto Area and has an estimated population of more than 145,400.

Programs or Activities Carried Out by the Intervenor:

The City has authority and carries out programs and activities as prescribed under the Municipal Act, 2001. The primary municipal activity affected by this application is the use and regulation of public property and public assets of the municipality, including highway construction and maintenance, infrastructure expansion and renewal. This application also

affects City policy and programs in the interest of economic, social and environmental well-being of the municipality, including respecting climate change. Infrastructure renewal and state of good repair of the City's assets is the largest focus of the City's most recent Council-approved capital budget. Space in the municipal right of way and other public spaces is limited, both above ground and below ground, as this space is used to convey services like water, telecommunications, electricity, natural gas and for transit infrastructure. Furthermore, as stated in its Future Guelph Strategic Plan 2024-2027, the City aims to be a leader in climate action, including empowering the community to help create a sustainable city. The Future Guelph Strategic Plan includes specific action items impacted by this application, namely item 9.1 "Establish a resilient and sustainable city by investing in climate change actions" and item 9.2 "Reduce energy use and greenhouse gas emissions". The City empowers the community by providing programs such as the Guelph Greener Homes Program, being item 10.2 in the Future Guelph Strategic Plan, which aims to make homes in our city more energy efficient through a zero-interest loan program for Guelph residents to complete energy efficiency home improvements. Furthermore, the City has developed a Climate Adaptation Plan which demonstrates the City's leadership and innovation in environmental stewardship and social responsibility and supports the City's vision of being a resilient city that adapts to a changing world. The City recognizes that we must be proactive in the management of public assets, property and infrastructure, to mitigate the impacts of climate change, protect our community, and ensure our long-term sustainability.

Governance Structure:

The City's representatives are employees of the City and will act from the authority granted to them by Council.

Representatives:

Matthew Irish
matthew.irish@guelph.ca
519-822-1260 3484

Jennifer Charles
jennifer.charles@guelph.ca
519-822-1260 2452

Cost Claim Filing contact:

Matthew Irish
matthew.irish@guelph.ca
519-822-1260 3484

Other Contacts:

Sara Temple
sara.temple@guelph.ca
519-822-1260 2448

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-2025-0058	OEB Consultations – Natural Gas	Granted

Issues:

As a municipal party to the Municipal Franchise Agreement, the City is materially impacted by the proceeding. The City anticipates that the following issues from the issues list will be the subject of its intervention: • 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 such changes be integrated into existing agreements)? The City 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 City awaits information from the OEB with respect to how it may comment on these draft issues.

Policy Interests:

The City represents the best interests of its residents and the amendments it seeks are intended to address the indirect subsidy granted to gas distributors under the Model Franchise Agreement, which is in contrast with the City's goals of fossil fuel reduction, proactive maintenance and use of public property and assets, and empowerment of citizens toward energy efficiency and climate mitigation and adaptation, including through flexibility in the event of change in law, alleviating the burden of expenses incurred by the City and the impact on tax payers as a result of gas-related infrastructure on municipal property. In this proceeding, Enbridge seeks an order of the OEB that the City approve by by-law the Model Franchise Agreement without amendments. The City intends to make policy submissions as to why the requested order is not in the best interest of the public

Hearings:

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

Coordination with Other Intervenors:

The City 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:

Pursuant to section 3.05(h) of the OEB Practice Direction on Cost Awards, municipalities are not eligible for a costs award. If it was permitted, the City would seek its costs.

Language Preference:

No.