



From: Ontario Energy Board <webmaster@oeb.ca>

Sent: Friday, May 1, 2026 3:45 PM

To: Office of the Registrar <Registrar@oeb.ca>

Cc: clerk@townshipleeds.on.ca

Subject: Intervention Form: EB-2026-000 - Township of Leeds and the Thousand Islands

Intervention Form

Case Number:

EB-2026-000

Requesting information on behalf:

Of an organization

Intervenor Name:

Township of Leeds and the Thousand Islands

Mandate and Objectives:

The Township of Leeds and the Thousand Islands, governed by an elected Council under the Ontario Municipal Act, operates with a mandate to provide local governance, infrastructure, and public services to its residents. Its core objectives center on sustainable growth, environmental stewardship, economic development, and enhancing the quality of life for its community, guided by a strategic plan.

Membership of the Intervenor and Constituency Represented:

The Council for the Township of Leeds and the Thousand Islands consists of seven members: a Mayor, a Deputy Mayor, and five Councillors, who are elected to four-year terms to govern the municipality. The Township itself serves a community of approximately 9,500, encompassing various villages and islands such as Lansdowne, Lyndhurst, Seeley's Bay and Rockport. The Township is also comprised of seven members of Senior Management and an additional 40+ employees.

Programs or Activities Carried Out by the Intervenor:

The Township of Leeds and the Thousand Islands carries out diverse programs focusing on governance, recreation, community development, and public services (roads and infrastructure).

Governance Structure:

The Township of Leeds and the Thousand Islands is governed by a seven-member elected council, structured as a lower-tier municipality within the United Counties of Leeds and Grenville in Ontario. The Clerk and the CAO are members of the Senior Management Team of the Township and will report to and receive instructions as required.

Representatives:

Michelle Hannah
clerk@townshipleeds.on.ca
613-659-2415

Marnie Venditti
directorplanning@townshipleeds.on.ca
613-659-24105

Cost Claim Filing contact:

Michelle Hannah
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Other Contacts:

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Corinna Smith-Gatcke
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613-659-2415

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
None		

Issues:

1. Material Impact of the Proceeding The Township of Leeds and the Thousand Islands ("the Township") is directly and materially impacted by the OEB's 2026 generic review of the Model Franchise Agreement (MFA). As a municipality that relies on the standard MFA for natural gas distribution (such as via Enbridge Gas Inc.), the outcome of this proceeding will determine the financial, operational, and environmental terms governing the use of our public road allowances and municipal infrastructure for the next 20 years. Specifically, the Township is impacted by: Infrastructure Costs: The current cost-sharing provisions for pipeline relocations during road construction projects significantly impact our capital budget. Asset Management & Sustainability: The treatment of decommissioned, abandoned infrastructure left in our right-of-way directly affects long-term maintenance costs and safety. Land Use & Compensation: The inability of the current MFA to allow for fair, reasonable compensation (franchise fees/access fees) for the use of our municipal right-of-way by for-profit utilities. 2. Issues from the Issues List The Township intends to participate in the 2026 generic proceeding, focusing on, but not limited to, the following, as identified in the OEB's draft issues list: Section 12 - Pipeline Relocation: The Township seeks to review the cost-sharing provisions to ensure a fairer allocation of expenses between the utility and the municipality for relocations necessitated by municipal works (e.g., road widening, utility upgrades). Section 15 & 16 - Disposition & Removal of Decommissioned Assets: The Township strongly argues that gas utilities must be responsible for removing abandoned, decommissioned pipe infrastructure, rather than abandoning it in place, as this creates a long-term liability for the municipality. Section 11 - Alternative Easements: Reviewing the notification and cost-sharing procedures when public roads are sold or closed while hosting gas pipelines. 3. Additional Relevant Issues The Township believes the following, while not explicitly highlighted, is highly relevant and should be added to the issues list for consideration: Fair Compensation for Public Right-of-Way Access: The review must address the restriction on municipal authority to impose access fees or land rental fees for the use of municipal highways. As other utilities (e.g., telecom) provide compensation, the current "free ride" provided to natural gas companies, as identified in recent municipal advocacy, is not in the best public interest and should be remedied to

reflect current economic realities. The Township requests to be recognized as an active intervenor to ensure the interests of our community, including financial sustainability and public safety, are represented in the new Model Franchise Agreement.

Policy Interests:

As the Corporation of the Township of Leeds and the Thousand Islands, our intervention in the Ontario Energy Board (OEB) generic proceeding regarding the Model Franchise Agreement (EB-2026-0009) is driven by our policy responsibility to manage local infrastructure, protect municipal rights-of-way, and ensure the cost-effective, safe, and efficient delivery of natural gas services to our residents and businesses. Our policy interests and their materiality to the proceeding are outlined below:

- 1. Protection of Municipal Infrastructure and Rights-of-Way: Policy Interest:** The Model Franchise Agreement directly dictates the terms under which a gas utility may enter upon, construct, maintain, and remove infrastructure on municipal highways and road allowances. **Relevance/Materiality:** As a rural municipality with unique geography, we have a significant interest in ensuring that the template agreement compels utilities to manage disruption, protect municipal infrastructure, and restore roads to a high standard, as described in the Gas Franchise Handbook. Any changes to the Model Franchise Agreement that reduce the utility's liability for damages or fail to maintain robust restoration standards would materially affect the township's operational budget and infrastructure management.
- 2. Fair Compensation for Land Use Policy Interest:** The Township seeks to ensure that the terms of the franchise agreement properly reflect the value of the municipal land being used by the utility, particularly concerning the abandonment of equipment. **Relevance/Materiality:** The current Model Franchise Agreement (last updated 1999) requires revision to address potential inequities, such as those identified in proposed reviews where natural gas utilities are not held to the same standards as other utilities regarding the removal of old equipment. This impacts municipal liability and the management of abandoned infrastructure under our roads.
- 3. Alignment with Long-Term Municipal and Energy Planning Policy Interest:** Ensuring the franchise agreement aligns with the municipality's asset management, climate change policies, and long-term energy planning, as indicated by the need to align with current Ontario Energy Board guidelines. **Relevance/Materiality:** As the township is actively working on development and sustainable infrastructure (e.g., wastewater projects), the franchise agreement needs to facilitate rather than hinder modernizing local infrastructure. The 20-year term typical of these agreements makes it vital that the template allows for future-proofing of our community's infrastructure.
- 4. Efficient Administration of Franchise Agreements Policy Interest:** The Model Franchise Agreement enables efficient administration of these agreements. **Relevance/Materiality:** The Township supports a standard template that reduces the time and cost for both the municipality and the utility compared to negotiating individual agreements from scratch. The Township of Leeds and the Thousand Islands, as noted in previous OEB proceedings, requires a clear, standardized framework to ensure compliance with the Municipal Franchises Act. The Township of Leeds and the Thousand Islands is participating to ensure that the updated Model Franchise Agreement maintains a balance between the efficient expansion of natural gas infrastructure and the protection of municipal interests, as outlined in the 2026 Generic Proceeding Notice.

Hearings:

We believe the best format to ensure all interested parties are heard should be utilized.

Evidence:

We are unable to answer this question at this time.

Coordination with Other Intervenors:

Coordination with upper-tier municipality as available as well as organizations such as the Association of Municipalities of Ontario.

Cost Awards:

unable to answer at this time.

Language Preference:

English