

**Subject:** Re: EB-2026-0009 OEB - Generic Review - Model Franchise Agreement (MFA) for Natural Gas - EGI Comments on Intervenor Requests

May 12, 2026

Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

Re: EB-2026-0009 – Response to Enbridge Gas Comments on Intervention Request

I write briefly in response to Enbridge Gas’s comments regarding my intervention request.

This proceeding will affect the relationship between municipalities and natural gas utilities for decades. While the Municipal Franchises Act was amended in 2025, the substantive framework governing municipal gas franchise arrangements has remained largely unchanged for decades. In the interim, significant activity has occurred in adjacent municipal utility access, right-of-way, permitting, and infrastructure coordination regimes.

In my respectful submission, this broader context is important. Ontario policy increasingly emphasizes standardization, permitting efficiency, infrastructure acceleration, economic development, and growth. A clear and modernized Model Franchise Agreement can support those objectives by improving predictability, reducing unnecessary friction, and aligning utility and municipal processes more effectively over both near- and long-term planning horizons.

The Province has already advanced this direction in broadband delivery through the AHSIP program and the use of a Municipal Access Agreement template that reflects current right-of-way access principles and provides more standardized terms for municipal right-of-way managers. Similar standardization themes are present in broader

provincial efforts affecting municipal planning, permitting, capital delivery, and reporting. The OEB itself has also advanced more standardized approaches in other areas, including budgets and reporting through its CAM work. Road authorities and related permitting processes have likewise moved toward more standardized practices. In that broader context, the present proceeding is an opportunity to consider whether the Model Franchise Agreement should better reflect the current state of coordinated infrastructure planning and implementation rather than remain a legacy outlier.

My request is based on a substantial and direct interest in the issues under review in this proceeding. I bring more than 30 years of experience in municipal infrastructure, utility coordination, rights-of-way, corridor governance, capital planning and delivery, franchise-related matters, asset management, and regulatory implementation. The specific issues identified by the OEB in this proceeding — including alternative easements, pipeline relocation cost-sharing and timing, decommissioned infrastructure, and the implementation of revised terms — fall directly within that experience.

My intended participation is not duplicative of the role of municipalities that have applied to intervene. Individual municipalities will appropriately advance their own local, institutional, and operational interests. My intended contribution is different. I seek to assist the OEB through a practical municipal-operational and cross-sector implementation perspective informed by direct experience with Municipal Franchise Agreements, Municipal Access Agreements, municipal capital delivery, precedent-setting CRTC proceedings, prior OEB regulatory engagement, and provincial work relating to permitting standardization, corridor coordination, and infrastructure delivery.

That perspective is directly relevant to this proceeding. The issues under review do not arise in isolation. They engage broader questions of infrastructure coordination, long-term corridor stewardship, relocation planning windows, cost allocation, and the interaction between utility access rules and real municipal capital and permitting processes.

My experience in large-scale asset management, long-term financial planning, master planning, and accelerated utility deployment reinforces that point. Strong and modernized agreements do not hinder infrastructure delivery; they support it by creating clearer rules, better sequencing, and more predictable long-term outcomes. My involvement in accelerated fibre deployment and related municipal access and permitting work demonstrated that when the underlying framework is clear, infrastructure can be delivered more efficiently while still protecting long-term municipal planning and corridor interests.

I also note that I have been engaged in other OEB processes, including the gas-electric

co-ordination consultation, in part to reacquaint myself with the OEB's current processes and consultation framework. That should not operate as a continuing bar to cost eligibility in this proceeding. This proceeding is materially different. It is directly aligned with the body of work I have carried out over decades, including franchise and access agreements, municipal utility coordination, long-term asset management, capital planning, and policy matters such as unmetered load and street lighting. My intended contribution here is correspondingly more specific, practical, and relevant.

With respect to cost eligibility, I respectfully submit that the question should be determined on the basis of whether my participation would materially assist the OEB in an efficient and non-duplicative way in this proceeding. My participation is intended to add value to the record by helping the OEB assess how the issues identified in the draft issues list operate in practice across municipal settings and over realistic planning horizons. I do not intend to duplicate the submissions of municipalities or other intervenors. I intend to contribute where my specialized experience is most relevant.

I remain committed to coordinating with other intervenors where appropriate and to keeping my participation focused and proportionate.

Yours truly,

Gord McGuire, B.Sc., O.L.S. (Ret.)

Independent Advisor

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