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July 31, 2026

Sent by EMAIL, RESS e-filing

Ritchie Murray
Registrar
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re: EB-2026-0147 EPCOR Natural Gas Limited Partnership ("ENGLP")
Application for a Limited Certificate of Public Convenience and Necessity for Norfolk County - Certificate Transfer
Reply Submission

Please find enclosed ENGLP's response to the OEB Staff's submissions of July 27, 2026.

ENGLP notes that to the best of its knowledge, no comments were submitted by Enbridge Gas.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

Digitally signed by Hesselink, Tim
Date: 2026.07.31 07:39:13 -04'00'

Tim Hesselink, CPA
Associate Director, Regulatory Affairs
ENGLP Natural Gas Limited Partnership
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Reply Submission of ENGLP Natural Gas Limited Partnership

The OEB Staff's submissions seek clarification regarding ENGLP's intention with respect to ownership of the pipeline associated with the certificate. ENGLP clarifies that below.

Ownership of the Pipeline

ENGLP's intention remains that ownership of the pipeline be transferred from Clearbeach Resources Inc. ("Clearbeach") to ENGLP. As noted in the prior proceeding, ENGLP and Clearbeach entered into an Asset Purchase Agreement dated November 29, 2024 to complete the purchase of the Purchased Assets (which includes the natural gas pipeline from the Maricann Station to the EZ Grow greenhouse delivery point along with a meter and regulating station)[1] provided all necessary approvals—such as the CPCN—are obtained and remain in effect.

ENGLP has paid Clearbeach the purchase price, but the Agreement is not effective until all regulatory approvals (CPCN) is granted. ENGLP and Clearbeach contemplated that the pipeline would ultimately be transferred to ENGLP following the issuance of the necessary regulatory approvals. The current application is intended to facilitate that outcome.

The requested certificate transfer is therefore directly connected to the transfer of the underlying pipeline asset. ENGLP agrees that the certificate should ultimately be held by the owner of the pipeline and does not seek a result whereby the certificate and asset ownership would remain permanently separated.

Consistency with Prior Proceedings

The relief sought in this proceeding is consistent with the OEB's comments in the prior certificate proceeding. In that proceeding, the OEB noted that if Clearbeach proceeded to sell the pipeline to ENGLP, a separate application would be required under section 18 of the OEB Act because the certificate would not transfer automatically as part of the commercial transaction[2]. This application has been brought for that purpose.

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[1] EB-2024-0239, ENGLP_REPLYSUB_20250212, Page 3;
EB-2024-0239, ENGLP_Addl IRR_Norfolk_20250612, Page 5;
EB-2024-0239, Transcript_OH_EPCOR Norfolk County CPCN_20250620, Page 15.

[2] EB-2024-0239, Decision and Order, November 6, 2025, Page 12.

Granting the requested relief would therefore complete the regulatory framework contemplated by the OEB's prior decision and facilitate alignment between ownership of the pipeline and ownership of the certificate.

Proposed Order

ENGLP does not object to the OEB granting leave to transfer the certificate subject to a condition that the transfer become effective upon completion of the transfer of ownership of the underlying pipeline asset from Clearbeach to ENGLP or upon ENGLP providing confirmation of that transfer in a form acceptable to the OEB. Such an approach would ensure that the certificate is held by the owner of the asset while permitting the transfer process to proceed efficiently.

All of which is respectfully submitted.