

SCOTT PETRIE LLP

LAW FIRM

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May 9, 2022

VIA ELECTRONIC FILING

Attention: Nancy Marconi, Registrar of the OEB

Ontario Energy Board
27th Floor, 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Registrar:

**RE: EB-2022-0086 – Enbridge Gas Inc. – Dawn to Corunna Replacement Project
CAEPLA-DCLC Intervention Request Letter – Our File No. 27883**

We are the lawyers for the Canadian Association of Energy and Pipeline Landowner Associations (“CAEPLA”) and its subcommittee, the Dawn Corunna Landowner Committee (“DCLC”). We are writing to request intervenor status and cost award eligibility in the above noted proceeding under the name CAEPLA-DCLC.

CAEPLA-DCLC and its interest in this proceeding

CAEPLA is a federally incorporated not-for-profit organization representing landowners from across Canada. CAEPLA has been at the forefront of active engagement with pipelines companies and federal and provincial regulators to develop new and better right-of-way agreements, construction and remediation methodology, and compensation provisions to address the impacts of pipeline construction and operation on agricultural landowners. CAEPLA and its regional associations have intervened on behalf of landowner members in many federal and provincial regulatory hearings.

CAEPLA’s membership includes a large of number of individual landowners directly affected by Enbridge Gas Inc.’s Dawn to Corunna Replacement Project (see enclosed Schedule “A” property listing). In this proceeding, directly affected landowner members intend to participate under the DCLC sub-committee of CAEPLA and to attempt to ensure that the environmental and socio-economic impacts of the proposed project are properly assessed and addressed by Enbridge Gas Inc. and the OEB.

CAEPLA has previously intervened in OEB Leave to Construct Application processes on behalf of landowners directly affected by Union Gas Limited (now Enbridge Gas Inc.) projects. One of CAEPLA’s founding member organizations, the Gas Pipeline Landowners of Ontario (“GAPLO”), has also previously intervened in a number of Union Gas Limited (now Enbridge Gas Inc.) Leave to Construct Application

processes. In its proposed intervention, CAEPLA-DCLC will draw on its extensive knowledge and experience in addressing the effects of proposed Union Gas Limited (now Enbridge Gas Inc.) projects.

None of CAEPLA, GAPLO or DCLC is a frequent intervenor before the OEB.

Nature and scope of CAEPLA-PLC's intended participation

CAEPLA-DCLC intends to participate actively in the proceeding by submitting interrogatories, evidence and argument. CAEPLA-DCLC requests that an oral hearing, preceded by a written discovery process and a settlement conference, be held in this matter so that it will have the opportunity to cross-examine Enbridge Gas Inc.'s witnesses and fully test Enbridge's evidence in support of its application.

Cost award

CAEPLA-DCLC requests a determination by the Board that it is eligible for a cost award in this proceeding. CAEPLA-DCLC primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding (the interests of pipeline landowners) and its membership includes persons with an interest in land that is affected by Enbridge Gas Inc.'s application (see enclosed Schedule "A" property listing). The ability of CAEPLA-DCLC and its landowner members to participate in this proceeding (for which the assistance of legal counsel and possibly expert consultants is required) is dependent upon a determination that CAEPLA-DCLC is eligible for a cost award.

CAEPLA-DCLC contacts

If intervenor status is granted to CAEPLA-DCLC as requested above, documents in this proceeding may be served on and delivered to CAEPLA-DCLC as follows:

Attention: Dave Core, Director of Special Projects

CAEPLA
#257-918 Albert Street
Regina, SK S4R 2P7

Tel: (306) 522-5000
Fax: (306) 522-5006
Email: davecore@caepla.org

-and-

Attention: John D. Goudy

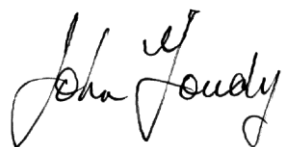
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200-252 Pall Mall St.
London, ON N6A 5P6

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Email: jgoudy@scottpetrie.com

We trust this is satisfactory and look forward to the Board's consideration of CAEPLA-DCLC's requests. Should you require any further information, please do not hesitate to email or call me.

Yours truly,

SCOTT PETRIE LLP
LAW FIRM

A handwritten signature in black ink that reads "John D. Goudy". The signature is written in a cursive style with a large, stylized "J" and "G".

John D. Goudy

Encl.

c.c.: Adam Stiers, Enbridge Gas Inc., Manager, Regulatory Applications, *via email*
Tania Persad, Enbridge Gas Inc., Counsel, *via email*
Charles Keizer, Torys LLP, Counsel, *via email*

SCHEDULE "A"

AFFECTED PROPERTIES OWNED BY CAEPLA-DCLC MEMBERS

<u>Enbridge #</u>	<u>PIN</u>	<u>Enbridge #</u>	<u>PIN</u>
1.	PIN: 43384-0096 LT		
2.	PIN: 43392-0096 LT		
3.	PIN: 43392-0081 LT		
4.	PIN: 43392-0084 LT		
5.	PIN: 43392-0085 LT		
6.	PIN: 43392-0065 LT		
7.	PIN: 43392-0062 LT		
8.	PIN: 43315-0067 LT		
9.	PIN: 43315-0062 LT		
10.	PIN: 43315-0061 LT		
11.	PIN: 43315-0057 LT		
12.	PIN: 43315-0056 LT		
13.	PIN: 43313-0059 LT		
14.	PIN: 43313-0060 LT		
15.	PIN: 43313-0064 LT		
16.	PIN: 43313-0067 LT		
17.	PIN: 43313-0068 LT		
18.	PIN: 43302-0105 LT		
19.	PIN: 43302-0104 LT		
20.	PIN: 43302-0079 LT		
21.	PIN: 43302-0286 LT		
22.	PIN: 43302-0055 LT		
23.	PIN: 43302-0053 LT		
24.	PIN: 43303-0091 LT		
25.	PIN: 43303-0090 LT		
26.	PIN: 43303-0089 LT		
27.	PIN: 43303-0088 LT		
28.	PIN: 43298-0124 LT		
29.	PIN: 43298-0123 LT		
30.	PIN: 43298-0125 LT		