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April 8, 2021

Ministry of Energy, Northern Development and Mines
77 Grenville Street, 10th Floor
Toronto, Ontario
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RE: PHASE 2 of the NATURAL GAS EXPANSION PROGRAM – ERO Number 019-3191

EPCOR Natural Gas Limited Partnership (“ENGLP”), through the Phase 2 Natural Gas Expansion Program, submitted multiple applications to the OEB for consideration of program funding. ENGLP would like to take the time to thank both the Minister and Associate Minister of Energy, Northern Development and Mines (“MENDM”) for the Phase 2 program and for the chance to connect Ontario residents with affordable, safe and reliable energy through many of the proposed projects.

Although not all of ENGLP’s projects were considered for grant funding as they did not meet the CPCN guideline stipulated, we hope that our efforts of supporting competition through this program are well recognized and have identified the need to allow competition on all projects regardless of incumbent CPCN qualifications. As identified previously in our response to the Draft Guidelines, the OEB has previously confirmed that CPCN rights are in fact non-exclusive, and that certificates do not grant exclusive rights to provide future service to an area, especially where there is no distribution service.

ENGLP believes that the projects it submitted reflect competitive capital costs, resulting in lower costs for both current and future natural gas customers as well as maximizing the number of customers able to receive natural gas service through the program. It would be helpful to see project cost savings developed in future competitive projects throughout the next available phase of the program.

We strongly urge MENDM to understand and appreciate our proposals and related analysis before moving forward with any awarded projects and/or future consideration of such proposals under a possible “Phase 3” program. We believe competition in the Ontario natural gas distribution sector is the best way to protect the public interest and best promote the expectations of current and future natural gas customers.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S. Robinson", written over a horizontal line.

Susannah Robinson
Vice President, EPCOR Ontario Utilities Inc.