

March 4, 2016

BY COURIER (2 COPIES) AND RESS

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Walli:

Re: EB-2016-0004 – Natural Gas Community Expansion

We are writing on behalf of Environmental Defence in response to the Ontario Geothermal Association's request for an extension of time for it to file evidence.

Environmental Defence supports the OGA's request. The evidence that the OGA is preparing appears to be highly relevant to this proceeding. A comparison between natural gas expansion and other environmentally preferred options would be very helpful when considering the criteria for approving community expansion projects and potential approaches to cost recovery. The OGA evidence is expected to address both carbon emissions and economic implications. Both of these factors are highly relevant to the regulatory approach chosen by the Board. In light of the importance of this evidence, Environmental Defence submits that the OGA should be provided with the time that it needs to adequately prepare its evidence.

Union and Enbridge have responded to indicate that it would be unfair to grant the OGA an extension of time and not to grant the same extension for the filing of the utility evidence. It is not self-evident that the OGA would be afforded an unfair advantage. It is often the case that intervenors are allowed to file evidence following the evidence submitted by the utilities. Although this is a generic proceeding, it did originate from an application by Union (EB-2015-0179).

Both Union and Enbridge are proposing to expand natural gas service and at least Union is proposing an alternative approach to recover revenues. In this way it is similar to the situation where Union and Enbridge are applicants that must put forward their evidence first. It would not be out of step with the normal Board practice to have a deadline for the OGA's evidence that is after the deadline for the utilities. Regardless, it is not self-evident that this would create an unfairness and the utilities have not provided any reasoning to justify why this would be the case.

Therefore, Environmental Defence requests that the OGA be granted an extension of time that is sufficient for it to prepare its highly relevant evidence.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', written in a cursive style.

Kent Elson

cc: Intervenor