

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

July 26, 2019

**Re: EB-2019-0006 Leave to Construct for the St. Laurent Pipeline Project (Ottawa)
Pollution Probe Letter of Comment**

Dear Ms. Walli:

Thank you for the email dated July 22, 2019 and a copy of Procedural Order No. 1 regarding the above noted proceeding. Pollution Probe appreciates the Board's consideration for stakeholder participation in this proceeding and the interest for an expedited approval in August. Procedural Order No. 1 indicates that Board Staff will be providing the review of economic, environmental and social impacts in this proceeding and we provide some brief comments below for consideration in lieu of our more detailed comments and questions related to the application.

Procedural Order No. 1 references that this project was included in the 2019-2023 Capital Portfolio, with a capital estimate of \$72.1 million and that Leave to Construct approval is also required from the Board for this project to be constructed and capitalized. Energy dynamics in communities including the City of Ottawa and the resulting fluctuating nature of the multi-year utility capital portfolio mean that information in a Leave to Construct application is much more accurate and detailed than initial portfolio estimates and this provides a better opportunity to assess the specific request and its impacts to Ratepayers and related stakeholders, prior to Board approval.

Procedural Order No. 1 also differentiates between an expansion project and a replacement project, particularly if the project was included in the company's Utility System Plan and Asset Management Plan. If those factors impact the filing requirement or rigour of review during the Leave to Construct proceeding, further clarity could be provided as part of the next update to the OEB's Environmental Guidelines for Hydrocarbon Pipelines and Facilities in Ontario, or subsequent updates to filing requirements. The filing requirements and the economic, environmental and social impacts on consumers and the impacted community stakeholders are the same for both new infrastructure and replacement infrastructure. In most cases, an expansion project may actually provide incremental benefits (vs. a replacement project) to the community that offset the economic, environmental and social impacts of the project. Only a full assessment of the project specifics through a Leave to Construct proceeding would enable these trade-offs to be made accurately.

Pollution Probe supports access to economical natural gas (over more carbon intensive and costly alternatives) and maintaining required infrastructure that meets Ratepayer and community needs. The proposed Leave to Construct, if approved by the Board, will continue to provide large volumes of natural gas for decades to this community. The City of Ottawa has been a leader in the clean energy future and on April 24, 2019 City Council declared a Climate Emergency. Ottawa has also undertaken



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several energy and climate change initiatives and is forecasting a significant decrease in natural gas usage over life of the proposed assets. These changes are forecasted to accelerate into the future and it was not clear from the material filed in the application how these factors were considered over the proposed life of the assets. An assessment through the Leave to Construct process against this change in energy demand would validate that the infrastructure design, costs and impacts are appropriate and that Ratepayer assets are not stranded in the future.

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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