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Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON
M4P 1E4

Dear Ms. Long

**RE: EB-2019-0194 Enbridge 2020 Rates Application
Energy Probe Intervenor Request Letter**

Energy Probe Research Foundation (Energy Probe) applies for intervenor status in the EB-2019-0194 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of rates commencing January 1, 2020.

Statement of Interest

Energy Probe is an environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its natural gas residential and small commercial customer supporters in Ontario, which we have some number of thousands, and will also be representing a broader concern with respect to the overall financial health and operational integrity of Ontario utilities. Energy Probe was an active participant in the related Enbridge proceedings, EB-2017-0306/0307, EB-2018-0139, EB-2018-0305, EB-2019-0003, EB-2019-0105, EB-2019-0137 and EB-2019-0172 proceedings and hopes that its participation in this proceeding will be of assistance to the Board.

Hearing

Energy Probe believes that some of the issues in this case can be resolved through settlement negotiations. However, in this application, Enbridge Gas is also seeking ICM funding for two

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projects in 2020 – the NPS 30 Don River Replacement Project in the EGD rate zone and the Windsor Line Replacement Project in the Union rate zone. Energy Probe believes that there are issues regarding the eligibility for ICM treatment and the cost estimates of these projects that require rigorous testing of evidence that only an oral hearing can provide. Enbridge Gas is also seeking approval of a cost allocation study for the Union rate zones that is too complex to be dealt with in a written proceeding and will require an oral hearing.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor Request Letter, including but not limited to all documents filed with the Board by the applicant and required by Energy Probe, should be directed to consultants:

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Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant to Energy Probe

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