

Ms. Christine Long  
Registrar & Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

December 6, 2019

**Re: EB-2019-0187 Saugeen First Nation Community Expansion Project**

Dear Ms. Long:

Pollution Probe is in receipt of the notice for the above noted proceeding posted December 5, 2019 and hereby applies for intervenor status and requests that it be eligible for the recovery of reasonably incurred costs for its participation.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of the current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

**Goals and Objectives**

Pollution Probe intends to focus on the consumer, environmental, policy and financial issues as summarized below.

- Maximizing the economic expansion of natural gas in accordance with the Board's feasibility guidelines provides consumer access to cost-effective and low emissions energy that aligns with provincial policy to expand the natural gas distribution systems to communities that currently do not have access to natural gas. The applicant indicates that they propose to attach 86 of the 176 customers in the community in the first 10 years. This low customer penetration rate impacts the feasibility for the project and the customer surcharge requested. Furthermore, it will be important to ensure that consumers do not bear the financial risk if project funding does not match the estimated economic modelling submitted in this proceeding and in fact Pollution Probe believes that based on the evidence there is a high risk of consumers paying more than required to reach the required Board feasibility requirement. The application requests approval of a volumetric consumer surcharge to the year 2060 for this project and Pollution Probe intends to request additional information related to the surcharge to allow the Board to assess the appropriate structure and application of the surcharge for this specific project.
- The application indicates that this pipeline has been oversized to serve as a future system reinforcement. Oversizing facilities now would avoid cumulative environmental and community impact associated with future reinforcement construction. However, project benefits can only be claimed once for Board consideration and cost associated with oversizing the facility may not be appropriate for inclusion in the consumer surcharge and/or PI calculation for this project.

- Provincial policy requires that all cost-effective natural gas energy efficiency opportunities be pursued and expansion to new consumers provides the best opportunity to ensure consumers are provided these opportunities. There are no details in the evidence filed on expected consumer penetration rates which could significantly increase customer penetration and reduce consumer costs. Once construction is complete and customers are attached, these consumer benefits will be lost if not addressed during this proceeding.

### **Intention to Seek Cost Awards**

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, future of natural gas and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible. Pollution Probe has been an active and valuable participant in proceedings before the Ontario Energy Board and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, community and environmental interests in Ontario.

Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

### **Notice**

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy  
Consultant for Pollution Probe  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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Michael Brophy, P.Eng., M.Eng., MBA  
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cc: Ms. Asha Patel, Enbridge (email via [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com))  
Mr. Guri Pannu Senior Legal Counsel, Enbridge Regulatory (via email)  
Richard Carlson, Pollution Probe (via e-mail)