

January 8, 2020

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Attn: Christine E. Long, Registrar and Board Secretary

By electronic filing and e-mail

Dear Ms Long:

Re: GEC Intervention - EB-2019-0159, Enbridge Gas 2021 Dawn-Parkway System Expansion Project – GEC Intervention and Request for Cost Eligibility

1. The Green Energy Coalition (GEC) hereby seeks intervenor status in this matter and requests that it be found eligible for costs.
2. The GEC is comprised of the Greenpeace Canada, Hamilton 350, Sierra Club of Ontario and Sierra Club of Canada. GEC's member groups are charitable or non-profit organizations active on environmental and energy policy matters. Hamilton 350 has joined GEC for this intervention as the project directly impacts the region where Hamilton 350 members reside and has implications for both the local environment and for climate change.
3. GEC has been an active participant in pipeline approval, IRP, and DSM regulatory matters before the Board and has a particular concern with respect to the current proposal which includes a request by the proponent for a generic approval of its IRP approach and associated regulatory requirements. In addition, the proposal involves increased import and export of fracking gas with its associated climate change impacts. GEC expects to be an active intervenor in this proceeding.
4. GEC requests that this matter proceed by way of oral hearing. This is so, *inter alia*, because the application:
 - includes a request for a generic approval of an IRP regulatory approach;
 - includes a request for approval of the applicant's IRP approach and conclusion in the instant case;

- has major implications for system planning, customer rates, and compliance with government policy goals related to environmental compliance;
 - involves potentially significant environmental impact upon sensitive lands;
 - raises questions as to the appropriateness and allocation of costs and risks (both economic and environmental) for a project that is in part intended to serve foreign markets, and;
 - is based on untested assumptions about Ontario's electricity generation regime.
5. GEC notes that the applicant bases its request for a written proceeding by suggesting urgency for the approval it seeks but it has not adequately explained either the urgency or its reasons for failing to bring a timely application if urgency does in fact exist. GEC urges the Board not to create a precedent rewarding such an approach by compromising the integrity of the process.
6. GEC requests that the following persons be included on the distribution list:

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Sincerely,



Cc: Enbridge Gas