



Adam Stiers
Technical Manager
Regulatory Applications
Regulatory Affairs

Tel: (519) 436-4558
Email: astiers@uniongas.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive N.
Chatham, Ontario, N7M 5M1
Canada

January 24, 2020

BY RESS, EMAIL AND COURIER

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2019-0159
2021 Dawn Parkway Expansion Project & IRP Proposal – Interventions**

In accordance with the Ontario Energy Board's ("OEB") Notice of Hearing issued in Enbridge Gas Inc.'s ("Enbridge Gas") 2021 Dawn Parkway Expansion Project & Integrated Resource Planning ("IRP") Proposal application (the "Application") proceeding, the following parties have applied for intervenor status:

- The Association of Power Producers of Ontario ("APPRO");
- The Building Owners and Managers Association, Greater Toronto ("BOMA");
- Canadian Manufacturers & Exporters ("CME");
- The City of Hamilton ("Hamilton");
- The City of Kitchener ("Kitchener");
- Consumers Council of Canada ("CCC");
- Energy Probe Research Foundation ("EP");
- Environmental Defence ("ED");
- Federation of Rental-housing Providers of Ontario ("FRPO");
- Green Energy Coalition ("GEC");
- Industrial Gas Users Association ("IGUA");
- London Property Management Association ("LPMA");
- The Low-Income Energy Network ("LIEN");
- Pollution Probe ("PP");
- School Energy Coalition ("SEC");
- Six Nations Natural Gas Company Limited ("SNNG");
- TransCanada PipeLines Limited ("TCPL"); and
- Vulnerable Energy Consumers Coalition ("VECC").

Enbridge Gas does not object to these parties being granted intervenor status. However, as set out below, Enbridge Gas is concerned that three of the potential intervenors — GEC, ED and PP — represent the same interests and cite identical

grounds as the basis for their interventions. Enbridge Gas is also concerned that GEC, ED and PP have mischaracterized the scope of the application and intend to pursue inquiries and make submissions that are beyond the scope of the issues relevant to an application for leave to construct.

With respect to the same representative interests and grounds for intervention expressed by GEC, ED and PP in their respective intervention requests, Enbridge Gas's concern is that when intervenors with identical interests and perspectives fail to coordinate their submissions, interrogatories and questioning, the efficiency of the process and of the hearing is compromised. To mitigate this risk, Enbridge Gas requests that the OEB direct GEC, ED and PP to coordinate their submissions, interrogatories and questions (and evidence, if applicable) such that these are presented in an efficient manner.

The applications for intervenor status of GEC and ED include argument and raise issues which are a mischaracterization of the application or may exceed the appropriate scope of the OEB's review of Enbridge Gas's application under sections 90 and 97 of the Act, including:

- asserting that the Project involves increased import and export of fracking gas;
- compliance with government policy related to climate change;
- the appropriate level of investment in energy efficiency or Demand Side Management ("DSM"); and
- the appropriateness of serving foreign markets.

As set out in its Application at Exhibit A, Tab 6, p. 15, "The proposed expansion of the Dawn Parkway System is not dependent upon any upstream pipeline projects that connect to the Dawn Hub." Accordingly, it is incorrect to assert that incremental import or export of "fracking gas" is a natural consequence of the Project. Similarly, it is not fair or reasonable to rely upon the OEB's review of the Application, as it relates to the proposed Project, as a venue to interpret and debate government policy related to climate change. Finally, consistent with commitments made in other Enbridge Gas leave to construct proceedings in 2019 (e.g., Stratford Reinforcement Project,¹ Windsor Pipeline Replacement Project² and 2021 Sarnia Industrial Line Reinforcement Project³), Enbridge Gas has included the IRP Proposal in support of establishing an IRP framework to guide Enbridge Gas's assessment of IRP alternatives ("IRPAs") relative to other facility and non-facility alternatives to serve the forecasted needs of Enbridge Gas customers. The broader question of the appropriate level of investment in energy efficiency/DSM is more appropriately considered as part of the OEB's ongoing Post-2020 Demand Side Management Framework Consultation process (EB-2019-0003). These issues are not relevant to the Application and in certain instances are being considered as part of other active OEB proceedings.

¹ EB-2018-0306, Reply Submission (February 27, 2019), pp. 1-2.

² EB-2019-0172, Enbridge Gas Application (August 9, 2019), Exhibit B, Tab 1, Schedule 3, p. 2.

³ EB-2019-0218, Enbridge Gas Application (October 7, 2019), Exhibit B, Tab 1, Schedule 3, p. 11.

Thus, Enbridge Gas requests that the OEB direct these intervenors to limit their submissions, interrogatories and questions (and evidence, if applicable) to relevant issues, excluding the issues set out above.

Timing of OEB's Decision

In order to avoid compromising the Project in-service date of November 1, 2021, it is important that a decision be made in respect of the Project by no later than April 30, 2020. If the OEB determines that this is not possible because of the need to consider the IRP Proposal at greater length, then Enbridge Gas requests that the OEB review the IRP Proposal separately from Enbridge Gas's application for leave to construct the Project. The approvals sought related to the Project and the request for determination that the IRP Proposal is reasonable and appropriate are mutually exclusive. Enbridge Gas has confined the IRP Proposal to a single Tab of evidence so that it might be reviewed and considered in the context of the Project or as a stand-alone application. If you have any questions with respect to this submission, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications

cc: Guri Pannu (Enbridge Gas)
Charles Keizer (Torys)
Myriam Seers (Torys)
EB-2019-0305 (Intervenors)
Zora Crnojacki (OEB Staff)