

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

January 28, 2020

**Re: EB-2019-0159 2021 Dawn Parkway Expansion Project & IRP Proposal
Response to Enbridge Letter of Comment**

Dear Ms. Long:

Pollution Probe just became aware that Enbridge filed a letter last week related to this proceeding and is providing the following letter in response the elements that relate to Pollution Probe.

Enbridge's letter dated January 24, 2020 supports participation by all interested stakeholders and it outlines a few concerns that Enbridge has related to coordination and scope of the proceeding. Pollution Probe prides itself on a collaborative approach that is cost-effective and delivers high value to the OEB and consumers. Accordingly, Pollution Probe intends to coordinate efficiently and avoid duplication with stakeholders in this proceeding where possible. That is typical practice for Pollution Probe and nothing different is proposed in this proceeding.

Enbridge also believes that there is a potential for the scope to expand beyond what it believes is reasonable for a Leave to Construct application. This appears to be primarily driven by the desired timing Enbridge would like for the OEB review and potential approval of the Leave to Construct application. The proposed infrastructure includes a large diameter transmission pipeline that will result in significant Ratepayer, environmental and socio-economic impacts. An open and transparent public assessment of this application is in the public interest. The gas supply issues that Enbridge appears to be most concerned about were not highlighted in Pollution Probe's January 10, 2020 letter. Pollution Probe is comfortable to have other stakeholders take the lead on those specific issues during the proceeding and coordinate appropriately.

It should be noted that Enbridge chose to include its request in this application for the OEB's review of its IRP Proposal and indicated that "Enbridge Gas is bringing forward the IRP Proposal at this time, and as part of this Application: (i) in recognition of OEB direction in recent decisions in applications for leave to construct and in the OEB's Report of the Board on the DSM Mid-Term Review that Enbridge Gas should demonstrate consideration of conservation and energy efficiency alternatives; (ii) to seek IRP policy guidance that is essential to the assessment of IRP alternatives ("IRPAs") as non-facility alternatives to capital projects going forward ...". An IRP policy review is not a typical component of a Leave to Construct application as has been highlighted by many stakeholders in their requests for participation. The OEB has modified its approach for EB-2019-0003¹ to accommodate Enbridge's request

¹ OEB letter dated December 19, 2019 regarding the Post-2020 Natural Gas Demand Side Management Framework Board File Number: EB-2019-0003

that its IRP be reviewed in this proceeding instead of EB-2019-0003. All relevant issues related to the requested approvals (i.e. proposed transmission pipeline and the IRP Proposal) will therefore need to be accommodated in this proceeding. For the Leave to Construct component, that includes the need for the facilities, options, costs and all impacts of the proposed facilities. For the IRP Proposal, that would include all issues to determine if the IRP Proposal is reasonable and appropriate in relation to this transmission project and all future projects.

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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