

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

February 7, 2020

**Re: EB-2019-0159 2021 Dawn Parkway Transmission Pipeline Leave to Construct
Pollution Probe Letter of Comment regarding Scope**

Dear Ms. Long:

In accordance with the process defined by the OEB, Pollution Probe provides input below on scope for the above noted proceeding. To be efficient we have also included a complimentary letter on TAF's behalf and another on behalf of the Clean Air Partnership and the Clean Air Council.

Pollution Probe supports the Board's decision to separate the review of the IRP Proposal from the Dawn Parkway transmission pipeline leave to construct review. Enbridge submitted the IRP Proposal in support of the Dawn Parkway pipeline and also requested a broader generic review. As outlined in Procedural Order No. 1, the generic review will commence under a separate proceeding and the IRP Proposal is still relevant in this proceeding to determine if Enbridge has satisfied the consideration of IRP issues (i.e. facility and non-facility LTC alternatives) specific to this pipeline proposal. An open and transparent oral proceeding would enable a fulsome review of the relevant issues and provide opportunities for all stakeholders to provide input and evidence into the process. Issues lists and public oral proceedings have been commonly used by the Board in the past for leave to construct applications (including smaller, less contentious pipeline proposals) and in Pollution Probe's view is an appropriate toolset for this proceeding.

The leave to construct application includes a large diameter transmission pipeline with significant issues as outlined by the Board in Procedural Order No. 1. The draft issues list includes most of the issues identified by Pollution Probe in its letter dated January 10, 2020 including Rate impacts, financial analysis, need/alternatives to the facilities, environmental and socio-economic impacts.

In addition to item 7 in the draft issue list (Does the Project's environmental assessment meet the OEB Environmental Guidelines for Hydrocarbon Pipelines?) Pollution Probe recommends inclusion of the following issue:

7b Are the net environmental and socio-economic impacts related to the proposed pipeline acceptable?

It is not just compliance with the Board's Environmental Guidelines that is critical, but the net impact of the proposed infrastructure based on an assessment using the Board's guidelines (i.e. to assess public interest). This is common practice and has been included in scope for leave to construct proceedings.

Pollution Probe also recommends inclusion of the following issue to the issue list.

11 Does the proposed project satisfy provincial policy including, but not limited to the Provincial Policy Statement, Municipal Energy Planning and the Ontario Environmental Plan.

This is included in the Board's guidelines and is a typical element in a leave to construct assessment. Pollution Probe recommends its inclusion to ensure transparency and avoid confusion during the proceeding.

Pollution Probe supports inclusion of the following issues during the proceeding:

- i. impacts related to the methods of upstream natural gas extraction (such as hydraulic fracturing) for natural gas that will be transported through the pipeline
- ii. impacts related to the ultimate downstream consumption of the natural gas transported through the pipeline.

These issues are included in the assessment of the need and alternatives as outlined in the draft issue list. In Pollution Probe's view it would be inappropriate to artificially limit the review of issues and restrict assessment of the issues outlined above. Typically, significant ratepayer funded infrastructure would be identified in the utilities long term asset plan or as part of its 5 Year Gas Supply Plan (Pollution Probe does note that Enbridge's Updated Asset Plan was filed in its 2020 rate case proceeding after this application was filed to list it as a proposed project. However, no details were provided to support the recent update). Enbridge did not provide any notification of the need for this facility to stakeholders in advance of the application and a full record of evidence and assessment should therefore be included in this proceeding.

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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**Re: EB-2019-0159 2021 Dawn Parkway Expansion Project & IRP Proposal
Letter of Support for Pollution Probe's Response to Enbridge Letter of Comment**

Dear Ms. Long:

TAF supports the recommendations and positions espoused in the Letter of Comment dated February 7, 2020, submitted by Pollution Probe regarding the scope of the Proceeding – Leave to Construct Application.

As the regional climate agency for the Greater Toronto Hamilton Area, TAF is strongly in favour of including the issue of whether the proposed project satisfies is consistent with existing provincial policies, including the Province's Made-in-Ontario Environment Plan. These considerations – and the other considerations raised by Pollution Probe – must be taken into account in order to protect ratepayer interests and ensure energy transmission infrastructure decisions are rationally aligned with provincial policy goals, including greenhouse gas reduction targets.


Please refer to Pollution Probe's Letter of Comment for a detailed rationale for the inclusion of these issues.

Thank you for your consideration in reviewing TAF's comments.

Sincerely yours,



Bryan Purcell
VP Policy & Programs, The Atmospheric Fund



The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.



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Re: EB-2019-0159 2021 Dawn Parkway Expansion Project & IRP Proposal

Clean Air Partnership is in receipt of Procedural Order No. 1 dated January 31, 2020 for the above noted proceedings and provides the below input in accordance with the Board's instructions.

Clean Air Partnership (CAP) is a charitable organization that works with municipalities and their community partners to improve air quality, advance active transportation, and take bold climate action. We convene networks, lead research and knowledge transfer, and catalyze transformative action. CAP serves as the secretariat for the Clean Air Council.

The Clean Air Council (CAC) is a network of 30 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area who work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions. More information on the Clean Air Council is available [here](#). CAC representatives are the municipal change agents within leading climate action municipalities and have been working collaboratively across the region for almost 20 years to support and enable progress on clean air and climate change actions.

CAP and the CAC supports the OEB's decision to separate the review of the IRP proposal from the Dawn Parkway transmission line review. Policy and infrastructure decisions are complex. It is the best interest of stakeholders and Ontarians to increase clarity in discussions and decisions in order to ensure that transparency and the best interests of Ontarians are advanced.

CAP and the CAC also recommends that the OEB Environmental Guidelines for Hydrocarbon Pipelines include not only net environmental and socio-economic impacts related to the proposed pipeline; but also includes consideration and transparency to how the proposal impacts the Province of Ontario's Environment Plan commitments; and involve and consult with municipalities with regards to their Municipal Energy Plans, and Official and Growth

Management Plans (developed to meet the requirements of the Growth Plan and Provincial Policy Statement).

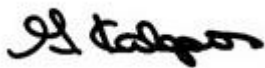
CAP and CAC also supports inclusion of the following into the Leave to Construct Application:

- **impacts related to the methods of upstream natural gas extraction (such as hydraulic fracturing) for natural gas that will be transported through the pipeline; and**
- **impacts related to the ultimate downstream consumption of the natural gas transported through the pipeline.**

As new opportunities continue to emerge with regards to emerging distributed energy resources, it will become increasingly important that these discussions and considerations become more transparent and include a wider variety of stakeholders; with a particular emphasis on increased opportunities for municipalities to more meaningfully engage in this process. CAP would be very pleased to facilitate municipal engagement into this process and discussion. Increasing alignment between utilities, Provincial ministries, the OEB, utilities, and municipalities will be in the best interests of our collective energy system as well as Ontarians long-term energy and financial needs.

Thank you for the opportunity to provide input and please do not hesitate to contact me regarding any questions or clarifications on the above input, or future municipal consultation opportunities that would be of value in this process.

Sincerely,



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