

# *Aiken & Associates*

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February 10, 2020

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

Dear Ms. Long,

**RE: EB-2019-0159 – Comments of London Property Management Association on Draft Issues List & Scope – Enbridge Gas Inc. 2021 Dawn Parkway Expansion Project**

In Procedural Order No. 1, dated January 30, 2019, the Ontario Energy Board (“OEB”) indicated that parties that had filed intervenor requests may file written submissions on the draft issues list attached to Appendix A of the Procedural Order and whether the scope of the Leave to Construct proceeding for Enbridge Gas Inc. (“EGI”) should include the impacts of the methods of upstream natural gas extraction and the impacts related to the ultimate downstream consumption of the natural gas transported through the pipeline. These are the comments of the London Property Management Association (“LPMA”).

Subject to the comments below, LPMA supports the draft issues list as shown in Appendix A to the Procedural Order.

LPMA has divided its comments with respect the potential expansion of the scope of the Leave to Construct proceeding into two parts.

First, with respect to the expansion to include the impacts related to the methods of upstream natural gas extraction (such as hydraulic fracturing) for natural gas that will be transported through the pipeline, LPMA submits that this would appear to be more appropriately dealt with and examined as part of the Integrated Resource Planning (“IRP”) proceeding that is to be dealt with by the OEB at a later time. Integrated resource planning should be just that....integrated across all energy/resource forms and types, from production/generation through transportation to consumption.

Second, with respect to the impacts to the ultimate downstream consumption of the natural gas transported through the pipeline, LPMA submits that while this should also be incorporated into the IRP review, there should be an addition to the Leave to Construction application that shows the impact on the impact on carbon emissions of the proposed project.

While the consumption of the incremental natural gas made available through the proposed pipeline project will increase carbon emissions, it will be offsetting the use of other fuels, such as heating oil, propane and electricity. It is unknown at this time whether this proposed project would reduce or increase carbon emissions. LPMA submits that it would be in the public interest to at least have an idea of the net impact on carbon emissions that result from this or any other project.

LPMA also notes that as part of the Stage 2 analysis provided by EGI in Exhibit A, Tab 8, Schedule includes a weighted average price comparison using prices for heating oil, propane and electricity to come up with a range of potential energy cost savings for consumers. LPMA submits that this information should also be used to estimate the potential increase in carbon emissions from the natural gas consumption and the potential decrease in the carbon emissions from the displacement of heating oil, propane and

electricity. This should be added to the environmental benefits section noted as a Stage 3 benefit at Exhibit A, Tab 8, pages 7-8.

Yours very truly,

*Randy Aiken*

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