

Elson Advocacy

February 10, 2020

BY COURIER (2 COPIES) AND RESS

Ms. Christine Long

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700

Toronto, Ontario M4P 1E4

Dear Ms. Long:

Re: EB-2019-0247 – Carbon Pricing Program Application

We are writing on behalf of Environmental Defence to submit a renewed request for intervenor status. In this renewed request, Environmental Defence is (a) identifying the issues it wishes to explore with additional specificity and (b) indicating that its intended participation is important but limited in scope. Environmental Defence does not wish to address the large portion of the application which is mechanistic in nature nor duplicate issues being addressed in the DSM Framework consultation. Environmental Defence does, however, believe there are some important issues to explore from the perspective of its public interest mandate.

In its initial intervention request dated January 10, 2020, Environmental Defence stated that it wished to raised important issues relating to its mandate in promoting the public interest in environmental protection and the interests of consumers whose bills can be reduced through energy efficiency and other means. The specific issues Environmental Defence wishes to explore are as follows:

1. **Process Issues:** We wish to explore whether annual changes in the carbon price can be incorporated without a full Board hearing and order. This could increase certainty for customers. It could also improve the effectiveness of a carbon price by achieving more predictable price signals.
2. **Timing Issues:** This is the second year with the possibility that the carbon price may not be incorporated into rates by April 1st. This can reduce the effectiveness of a carbon price by sending less clear price signals. We wish to explore ways to avoid this in the future. Allowing annual carbon price changes without a Board order is one example.
3. **Fugitive Emissions:** We wish to explore whether Enbridge's approach to and treatment of fugitive emissions is appropriate. Fugitive emissions are a potent contributor to global warming. It is important that they are being forecast and measured appropriately.

4. **Energy Efficiency:** Environmental Defence is concerned that there are no energy efficiency programs aimed at reducing carbon costs. We believe carbon pricing, as an important price signal, should drive increased energy efficiency efforts. Environmental Defence intends to ask the Board panel hearing this case to confirm whether carbon-price-driven will be addressed in the DSM framework process.
5. **New Business Activities:** In the scope decision for the 2019-2020 carbon pricing case, the Board referred to the following potential alternative process to address carbon-price-driven carbon abatement measures:

The Undertakings Enbridge Gas has made to the provincial government within which the OEB can permit Enbridge Gas to undertake new businesses on a case-by-case basis. Enbridge Gas can bring forward applications for the OEB's consideration for new business activities to support the reduction of greenhouse gases.¹

Unfortunately, Enbridge has not brought forward any such application, and therefore it is not clear how Environmental Defence can ask the Board for directions regarding these kinds of new business activities aimed at carbon abatement. We wish to ask interrogatories about the status of Enbridge's work in this regard and potentially ask the Board for guidance on process and next steps.

At this stage, Environmental Defence only wishes to ask interrogatories in relation to the above issues. We may be satisfied with the responses and have few or no submissions. We may have a small number of concrete requests for the Board, but we cannot say as of yet whether or not that will be the case. For now, we are seeking intervenor status to ensure that these issues relating to Environmental Defence's public interest mandate are explored in this process, at least at the interrogatory stage. We believe the Board would benefit by having an intervenor with this important perspective in an application regarding carbon pricing.

Yours truly,



Kent Elson

cc: Parties in the above proceeding.

¹ EB-2018-0205, *Procedural Order #2*, April 2, 2019, p. 2.