

Elson Advocacy

February 14, 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

I am writing pursuant to Rule 22.08 of the OEB's *Rules of Practice and Procedure* to provide a response to Enbridge's objection to Environmental Defence's application for intervenor status. Environmental Defence has outlined a proposed intervention that would be "limited in scope."¹ Enbridge's concerns about the breadth and scope of Environmental Defence's intended participation are unfounded.

Enbridge argues that the process and timing issues raised by Environmental Defence are "more appropriately managed by the applicant." Environmental Defence submits that the Board has the jurisdiction to hear submissions on these issues and make any process or timing directions it believes are appropriate. These issues are not irrelevant nor out of scope.

Enbridge suggests that Environmental Defence may intend to "propose that Enbridge Gas be directed to implement incremental abatement measures through this proceeding as a means to avoid FCPP-related costs associated with fugitive emissions." As outlined in my letter of February 10, 2020, that is not Environmental Defence's intention. Environmental Defence will not be proposing that Enbridge be directed to implement incremental abatement measures through this proceeding. Environmental Defence simply wishes to explore how Enbridge has addressed the various kinds of unaccounted for gas volumes in its application.

Enbridge also suggests that Environmental Defence will ask the Board to direct Enbridge to implement incremental energy efficiency or commence new business activities through this proceeding. Environmental Defence will not do so. As outlined in my letter of February 10, 2020, Environmental Defence is simply seeking information regarding where and when these issues will be addressed.

¹ Environmental Defence Intervention Request Letter, February 10, 2020.

Environmental Defence fully understands that the Board will not be directing Enbridge to implement incremental abatement in this proceeding and that review of the application filed by Enbridge will be limited to considering recovery of its costs related to the FCPP. As in the previous Carbon Pricing Program Application, Environmental Defence's participation will be limited and fully within scope.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', written in a cursive style.

Kent Elson

cc: Parties in the above proceeding.