

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

March 18, 2020

**Re: EB-2020-0074 Enbridge 2020 Storage Enhancement Project  
Pollution Probe Intervenor Request Letter**

Dear Ms. Long:

Pollution Probe is in receipt of the notice for the above noted application and requests intervenor status and that it be eligible for the recovery of reasonably incurred costs for its participation.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of our current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

**Goals and Objectives**

Pollution Probe intends to focus on the following areas during this proceeding.

- Additional storage capacity created by the Project is proposed to be sold to third parties as part of the Enbridge Gas unregulated storage portfolio at a time where Enbridge has identified a similar need for its regulated customer base. It is unclear what is driving the need for additional capacity (regulated and unregulated) and if Ratepayers should be receiving the benefit if Enbridge requires greater supply to meet the needs of Ontario Ratepayers.
- Allocation of Ratepayer costs and benefits related to the Black Creek, Coveny and Wilkesport storage assets.
- It appears that the unregulated storage portfolio would get preferential access to the additional capacity proposed and potentially drive higher costs for Ontario Ratepayers. If this capacity is allocated to meet the requirements of Enbridge unregulated storage service customers, it will not be available to meet Ontario Ratepayer needs and the Provincial policy goals to expand natural gas distribution in Ontario.
- The Project is the first phase of a larger project to increase deliverability and storage capacity at Enbridge Gas' storage facilities. Assessment of this phase in the context of the broader project would help optimize adequate storage resources and overall operation of the unregulated/regulated storage related assets.
- Other relevant consumer, financial and environmental issues within the scope of the proceeding.

### **Intention to Seek Cost Awards**

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, future of natural gas and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible.

Pollution Probe has been an active and valuable participant in proceedings before the Ontario Energy Board and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, municipal and environmental interests in Ontario.

Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

### **Notice**

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy  
Consultant for Pollution Probe  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Respectfully submitted on behalf of Pollution Probe.



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cc: Rakesh Torul Enbridge. (via [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com))  
Tania Persad, Enbridge Legal (via email)  
Richard Carlson, Pollution Probe (via email)