

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

May 4, 2020

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning Proposal
Pollution Probe Intervenor Request Letter**

Dear Ms. Long:

Pollution Probe is in receipt of the notice for the Enbridge Gas Integrated Resource Planning (IRP) Proposal proceeding and requests intervenor status and that it be eligible for the recovery of reasonably incurred costs for its participation.

Pollution Probe has been an active participant in proceedings related to IRP, including pipeline facility applications, DSM and gas supply/system planning. Pollution Probe represents the direct interests of consumers and an interest and policy perspective relevant to the Board's mandate in this proceeding. Pollution Probe works directly with consumers and communities in Ontario and also works collaboratively with organizations including the Clean Air Partnership and Clean Air Council that represents over 30 municipalities in Ontario. Through its collaboration, Pollution Probe also provides an opportunity for Ontario consumers, municipalities and related organization that do not have capacity to participate in this proceeding directly.

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>

The OEB indicated that it intends to solicit input for an issues list for this proceeding. IRP by its very nature links many issues together including supply & demand issues, DSM, alternatives to capital investment and efficient long-term planning to meet Ontario's energy needs in a cost-effective manner. With increasing local community energy planning it is important to ensure that Ratepayer funded infrastructure is coordinated in a manner that does not duplicate other energy investments. There are also complimentary proceedings such as EB-2019-0003 (DSM Framework which originally included IRP in its scope) where issues will be relevant to IRP and to the extent that innovative and more cost-effective alternatives are identified through those proceedings, Pollution Probe recommends that they be considered as part of IRP. The OEB has an excellent recent model with its ongoing DER proceedings where Board Staff coordinate across related proceedings to ensure that a comprehensive consumer focus is used while avoiding duplication. This innovative and efficient approach has worked very well.

One option that the OEB could consider to provide IRP guidance in a clear manner is to develop a detailed IRP Guideline similar to that for other purposes like DSM. An IRP Guideline could be reviewed periodically for updates and provides guidance on all elements to consider when planning and operating future infrastructure.

Goals and Objectives

Pollution Probe intends to participate actively in all aspects of the proceeding and focus on the following areas.

- Ensuring that the IRP Proposal and related guidelines are effective, comprehensive and provide a sound basis to assess alternatives in a cost-effective manner.
- Assess whether Enbridge Gas' IRP Proposal adequately responds to previous OEB direction and guidance on IRP, and whether Enbridge Gas' IRP proposal necessitates consequential changes to any other OEB policies, codes, or guidelines.
- Assessment of the benefits and costs for Ontario consumers and risks related to the IRP Proposal.
- Assessment of the potential range of IRP alternatives including demand response, enhanced targeted energy efficiency, low-carbon and non-gas solutions.
- Assessment of the impact of the IRP Proposal on capital projects including consideration of provincial policy and alignment with essential IRP considerations including conservation and energy efficiency alternatives.
- Subject to greater clarity from the OEB on their approach to engage experts, Pollution Probe can also provide relevant best practice information related to natural gas IRP as appropriate.
- Other relevant issues identified through Pollution Probes coordination with consumers, municipalities and industry stakeholders.

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.



150 Ferrand Drive, Suite 208
Toronto, Ontario M3C 3E5
T 416.926.1907 F 416.926.1601
www.pollutionprobe.org

Notice

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

Michael Brophy
Michael Brophy Consulting Inc.
Consultant for Pollution Probe
28 Macnaughton Road
Toronto, Ontario M4G 3H4
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: Enbridge (via EGIRegulatoryProceedings@enbridge.com)
OEB Case Manager, Michael Parkes (via email)
OEB Board Counsel, Michael Millar (via email)
Richard Carlson, Pollution Probe (via email)