



THE BOARD OF DIRECTORS

PATRICIA ADAMS
Chair and President
ANN CAVOUKIAN
Executive Director, PBID, Ryerson University
ANDREW COYNE
Columnist, Globe and Mail
IAN GRAY
President, St. Lawrence Starch Co. Ltd.
GAIL REGAN
President, Cara Holdings Inc.
GEORGE TOMKO
Expert-in-Residence in IPSI, University of Toronto

MAX ALLEN
Producer, CBC Radio
DAVID CAYLEY
Writer and Broadcaster
GLENN FOX
Economist, University of Guelph
BRUCE PARDY
Professor of Law, Queen's University
ANDREW ROMAN
Lawyer

May 5, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Long

**RE: EB-2020-0091 Enbridge Gas IRP Application
Energy Probe Intervenor Request Letter**

Energy Probe Research Foundation (Energy Probe) applies for intervenor status in the EB-2020-0091 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for approval of its Integrated Resource Plan.

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its many individual residential customer supporters who have broad concerns with respect to the overall financial health and operational integrity of Ontario utilities. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. Energy Probe promotes sustainable resource use through individual responsibility and accountability.

Energy Probe's interest in this proceeding will focus on the proposed Project Attributes Supporting Relevance of IRP Alternatives, the activities that would be considered in an IRP, and the proposed treatment of IRP costs as capital. Energy Probe believes that an examination of the appropriate IRP framework will consider the long-term economic value of natural gas infrastructure projects. The current E.B.O. 134/188 Guidelines seek to examine cash flow as well as some broader economic considerations in Phase 2 and Phase 3. The value provided by a wider

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org

view of natural gas infrastructure projects to current and future generations of Ontario energy users will be a focus for Energy Probe on behalf of its residential supporters.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe plans to be an active participant in the hearing, whether it is in an oral or written form.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor Request Letter, including but not limited to all documents filed with the Board by the applicant and required by Energy Probe, should be directed to consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com
--	--

Respectfully submitted on behalf of Energy Probe.



Tom Ladanyi
Consultant representing Energy Probe

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org