

Elson Advocacy

May 13, 2020

BY RESS

Ms. Christine Long

Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700, P.O. Box 2319
Toronto, Ontario M4P 1E4

Dear Ms. Long:

Re: EB-2020-0066 – Enbridge Gas Inc. – Voluntary Renewable Natural Gas Program

We are writing on behalf of Environmental Defence to re-submit a request for intervenor status and costs eligibility in the above proceeding. The initial request dated April 15, 2020 is enclosed, which appears not to have been received by the Board.

We ask that the Board grant intervenor status at this stage in the proceeding because: (1) an initial request was prepared on time but never received due to an inadvertent technical issue, (2) there will be no delay to the hearing, (3) there will be no prejudice to any party, and (4) we have moved quickly to address this issue.

On April 15, 2020, I attempted to submit the attached request for intervenor status. It appears that this was unsuccessful due to a technical issue. I have experienced repeated time-outs when attempting to upload documents via RESS since mid-March and I expect that this caused the problem. To ensure that this does not occur again going forward, I will take additional steps to confirm that all documents are received. Although we had not heard anything further regarding this proceeding, this was not a surprise in current circumstances.

To ensure that there is no delay to this proceeding, we will provide interrogatories by noon tomorrow. Although this is somewhat past the May 7, 2020 deadline, we expect that Enbridge will not have completed its interrogatory responses and therefore will simply be able to add this to its list of outstanding responses to complete in the coming weeks.

In addition, I only discovered this issue this afternoon and I am moving as quickly as possible to address it.

Finally, I note from *Procedural Order #1*, that the Board wishes to ensure that participation is limited to issues within scope. As noted in the attached intervention request of April 15, 2020, Environmental Defence wishes to address issues “such as the optimal program design,

appropriate reporting, and cost-effectiveness.” Environmental Defence has no intention to make submissions on broad environmental issues relating to RNG or other issues that would be out of scope.

Please do not hesitate to contact me if anything further is required.

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