

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

May 29, 2020

Re: EB-2020-0094 Harmonized System Expansion Surcharge, Temporary Connection Surcharge and Hourly Allocation Factor - Pollution Probe Intervenor Request

Dear Ms. Long:

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

Pollution Probe has been an active participant in expansion proceedings, review of project surcharges and also in the recent proceeding related to Expansion of Natural Gas Distribution in Ontario. Pollution Probe has promoted a harmonized approach in the most fair, transparent and cost-effective manner for consumers. 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 also works collaboratively with consumers and organizations such as the Clean Air Partnership and Clean Air Council that represents over 30 municipalities in Ontario.

Enbridge proposes that these issues be treated in a generic manner rather than through a specific facility application. This type of broad policy decision is typically reviewed as part of an oral hearing given the far-reaching impact it will have for consumers and expansion in Ontario. Another option for the OEB to consider is a generic proceeding that would set harmonized rules for all gas distributors in Ontario to ensure a fair and consistent policy for all natural gas expansion.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of the 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 actively participate in all aspects of this proceeding with a focus on the following areas.

- Fairness, transparency and financial treatment of the proposed System Expansion Surcharge ("SES"), Temporary Connection Surcharge ("TCS") and Hourly Allocation Factor ("HAF").

- Scope and application of the changes proposed (e.g. 50 customer threshold and the ability to substitute a negotiated agreement). Relevance to projects greater than 50 customers such as project proposed to be supported through Provincial grants and alignment with EBO 188.
- Other relevant issues based on feedback from municipalities, consumers and industry partners (e.g. Clean Air Partnership and Clean Air Council)

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

Respectfully submitted on behalf of Pollution Probe.



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