

June 9, 2020

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

Dear Ms Long

**Re: EB 2020-0091 Enbridge IRP – GEC Reply Comments on Proposed Issues List**

GEC has reviewed comments of other parties and makes the following submission in reply:

Enbridge has called upon the Board to limit the scope to avoid any matter addressed in other potentially overlapping processes, whether past, ongoing or in the future. GEC is concerned that this approach, if taken strictly, would render the current IRP review meaningless. For example, if the Board were to decline to consider the planning horizon for facilities, DSM or commodity and transportation, we would likely see a repeat of past experience where Enbridge has avoided alternatives by applying for facilities approvals with inadequate lead time to implement alternatives or to avoid supply commitments.

SEC, ED, FRPO and others have noted that many of the draft issues ask whether certain aspects of Enbridge's proposal are appropriate and those intervenors have recommended that the issues be recast to ask about the topic in general and not be restricted to Enbridge's proposal on the topic. GEC agrees that the proceeding should not be constrained by Enbridge's framing of its proposal.

All of which is respectfully submitted,

Sincerely,



David Poch  
Cc: all parties