

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

June 11, 2020

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning Proposal
Pollution Probe Reply Submission on the OEB Draft Issues List**

Dear Ms. Long:

Pollution Probe has reviewed the submissions from Parties on the Draft Issues List and has the following reply comments.

Pollution Probe endorses GEC's reply comments submitted June 9th which reiterate the importance of an inclusive scope for the IRP proceeding and issues list. The IRP Proposal submitted by Enbridge for review is narrow in scope compared to the complete set of issues required to assess an appropriate and effective IRP Framework. Taking a narrow view on IRP defeats the purpose and takes away the badly needed efficiencies and benefits of integrated resource planning.

A more inclusive scope will also be time and cost efficient since it will enable resolution of some issues that will otherwise linger and require additional time and resources in other proceedings. It also aligns with enabling a best practice review through the Board Staff consultant and evidence from other parties on best practices, as appropriate.

It is enlightening to see that the majority of stakeholders that made submissions have suggested that taking a more inclusive approach that is not restricted by the framing provided by Enbridge is appropriate. Although IESO did not make a submission, its request for participation indicates that the scope of IRP requires greater consideration than that proposed by Enbridge. Greater detail supporting this perspective is included in the original submissions by Pollution Probe, GEC, SEC, ED, FRPO and other stakeholders. To be efficient, Pollution Probe has not reiterated all those points again in this submission.

Respectfully submitted on behalf of Pollution Probe.



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