



---

## THE BOARD OF DIRECTORS

PATRICIA ADAMS  
Chair and President  
ANN CAVOUKIAN  
Executive Director, PBDI, 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

September 11, 2020

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

Dear Ms. Long

**RE: EB-2020-0136 Enbridge NPS 20 Replacement Cherry Street to Bathurst Street  
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2020-0136 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its proposed NPS 20 Replacement from Cherry Street to Bathurst Street.

**Statement of Interest**

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website.

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

If the NPS 20 Replacement project is approved and built, residential customer supporters of Energy Probe will ultimately be required to pay for it in gas rates. Energy Probe, therefore, has a direct interest in the purpose, need and timing of this project, the selection of the preferred alternative route, and the construction cost estimate.

---

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

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

## **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 believes that it can be in 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 and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultant:

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
41 Divadale Drive  
Toronto ON  
M4G 2N7  
Tel: 416 423-3685  
[tom.ladanyi@rogers.com](mailto:tom.ladanyi@rogers.com)

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
Consultant representing Energy Probe

cc. Joel Denomy (Enbridge Gas Inc.)  
David Stevens (Aird & Berlis LLP)  
Patricia Adams (Energy Probe Research Foundation)