

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

September 14, 2020

**Re: EB-2020-0136 - Enbridge NPS 20 Cherry to Bathurst Leave to Construct  
Pollution Probe Intervention 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 facility proceedings, including Leave to Construct applications. 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 organizations including the Clean Air Partnership and Clean Air Council.

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.

Project issues including the financial, environmental and socio-economic impacts and alignment with policy requirements. This proposed large diameter pipeline is located along a densely populated downtown area of the City of Toronto and will require significant impact mitigation if approved. Please note that Golder Environmental Report was filed in this proceeding, but Pollution Probe was not able to open Enbridge's Environmental Report (not filed in the proceeding, but a link was provided in Exhibit C Tab 1 Schedule 1 Attachment 1 - [https://www.enbridgegas.com/-/media/Extranet-Pages/Projects-tab-links/NPS-20/EGI\\_NPS20\\_C2B\\_ER\\_final\\_redacted\\_secured.ashx?la=en&hash=AAEC19CB4093D2F8884131796C6B0AF2D9129809](https://www.enbridgegas.com/-/media/Extranet-Pages/Projects-tab-links/NPS-20/EGI_NPS20_C2B_ER_final_redacted_secured.ashx?la=en&hash=AAEC19CB4093D2F8884131796C6B0AF2D9129809)). Based on Pollution Probe's review, it appears that detailed mitigation plans or drawings for the project have not been included in the materials filed. In other transmission projects requiring Leave to Construct approval Enbridge has often filed the proposed detailed mitigation plans as a separate exhibit.

Enbridge indicates that the proposed pipeline is part of a critical loop connecting to multiple feeder stations. This loop is required to support identified load growth in the City of Toronto and to provide natural gas to a large portion of customers in the downtown core during peak conditions. Customers in

this zone include the Enwave and the Portlands Energy Center which provides energy services within the City of Toronto. Enbridge has also identified this project as an essential part of its integrated system planning against less costly options as part of its analysis. Enbridge Gas has used a high level screening process and proposes that an in-depth IRP analysis is not warranted for this Project.

It is unclear if this project is part of Enbridge's 2021 Asset Plan (capital has been deferred to Phase 2 of the 2021 Rate Case) and greater clarity in relation to Enbridge's current asset plan would be helpful.

### **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  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA  
Michael Brophy Consulting Inc.  
Consultant to Pollution Probe  
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cc: Enbridge (email via [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com))  
David Stevens, Aird & Berlis (via email)  
Richard Carlson, Pollution Probe (via email)