

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

October 19, 2020

**Re: EB-2020-0192 – Enbridge London Line Replacement Project 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, which represent consumers and municipalities impacted by the proposed project.

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/687123/File/document>

Goals and Objectives

Pollution Probe intends to actively participate in all aspects of this proceeding with a focus on the following areas.

Financial (including proposed capital treatment), environmental and socio-economic impacts related to the proposed pipeline (and abandonment if Enbridge requests OEB approvals specifically related to the proposed abandonment). This proposed pipeline is a significant length, including 51.5 kilometres of Nominal Pipe Size ("NPS") 4 pipeline and 39 kilometres of NPS 6 pipeline to replace the existing London Lines. The proposed pipeline would replace the London South Line and London Dominion Line which are two pipelines that are parallel to each other, approximately 60 km and 75 km and including pipe segments that are NPS 8, 10 and 12. Enbridge has indicated that requested approvals are for the new facilities outlined above, but recently has interpreted OEB approval to also include approvals for abandonment of the existing pipeline (reference EB-2020-0160). If Enbridge is requesting OEB approval related to the pipeline abandonments in this proceeding, an assessment of costs, impacts and mitigation would also apply to those facilities. Pollution Probe recommends an issues list be developed for this proceeding to ensure clarity for the OEB and all stakeholders.

Pollution Probe intends to review the DSM assessment Enbridge has conducted as an alternative to the project (reducing pipe size, costs and impacts). Enbridge has not filed the integrated resource planning screening its conducted for large projects (e.g. similar type of project is Toronto replacement project in EB-2020-0136). The integrated resource screening provides the required information to assess pipeline size options and alternatives. An assessment of customers served by the proposed pipeline and alternatives to the project provide the fundamental basis for validating the project need, pipeline size, mitigation and related costs/impacts. Communities served by this pipeline have aggressive plans to reduce natural gas usage over the life of the proposed pipeline and the application does not indicate how relevant information from these plans was used to assess the need and scope of facilities proposed. Future demand is directly relevant to the purpose, need and design of the proposed pipeline.

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.

Notice

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy
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Respectfully submitted on behalf of Pollution Probe.



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cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Charles Keizer, Torys (via email)
Richard Carlson, Pollution Probe (via email)