

October 20, 2020

Ontario Energy Board
Attn: Christine E. Long, Registrar and Board Secretary

By e-mail and electronic filing

Dear Ms Long

Re: EB-2020-0091 EGI IRP Proposal – Interrogatory Process

I write on behalf of the Green Energy Coalition (“GEC”) and Environmental Defence (“ED”) to request an opportunity to receive interrogatory responses from Enbridge prior to the completion of our expert's report. Our expert has advised us that he requires access to additional information to complete his report. To provide one example, he has requested a copy of the results of the IRP in-field case studies conducted by Enbridge starting in 2017. A preliminary interrogatory step is needed to promote fairness in light of the asymmetry of data and information as between Enbridge and our clients.

I have discussed this with counsel for Enbridge who was not in a position to provide any firm commitments but indicated that we could submit IRs to the company at this time and the company may be prepared to consider responding. Our expert expects to have completed an initial review of Enbridge's evidence submitted on October 15, 2020 such that we could file those initial interrogatories this Friday, October 23, 2020. We would propose that Enbridge provide responses within two weeks, by November 6, 2020. We respectfully request directions from the Board in this regard.

Sincerely,



David Poch

Cc: all parties