

October 26, 2020

BY RESS AND EMAIL

Ms. Christine Long
Board Secretary
Ontario Energy Board

Dear Ms. Long:

Re: EB-2019-0159 – Enbridge Gas Inc. – Kirkwall-Hamilton Pipeline Project – EGI Proposed Withdrawal of Application

GEC is in receipt of Enbridge's letter of October 22nd seeking to withdraw the above-noted application and awaiting the Board's direction in that regard.

As the Board will be aware, there have been several facilities applications where EGI has indicated it is too late, or too uncertain, in their view, to displace pipeline with non-pipe alternatives. In our respectful submission this pattern should come as no surprise given that Enbridge, with its immense investment in upstream infrastructure and an incentive for rate base expansion, has a strong motivation to favour investments in pipe over investments in efficiency, demand response and fuel switching. The proposed withdrawal of this application presents an opportunity to ensure that the same pattern of neglect of alternatives does not reoccur.

The current IRP proceeding will, in a generic fashion, examine issues such as planning lead time, alternatives screening, and incentives. However, we are concerned that time may be of the essence in the case of the possible Kirkwall-Hamilton reinforcement. This project has the unusual characteristic of serving virtually the entire franchise area (as well as ex-franchise users). The large area served by the Kirkwall-Hamilton facilities suggests that geographically widespread alternatives can be considered. The potential savings for customers and the contribution that a widespread non-pipe alternative can make to meeting provincial and national GHG reduction policy goals suggests that it is vital to ensure timely consideration of all alternatives. Accordingly, we urge the Board to place conditions on the withdrawal that catalyse immediate analysis and action on alternatives while respecting the coincident generic IRP review process.

Specifically, we suggest that Enbridge be directed to:

1. File an explanation with data and updated forecasts explaining in detail how changed circumstances have affected the need for the project.

2. Immediately embark on an updated and expanded review of alternatives that may defer or displace the potential need for Kirkwall-Hamilton reinforcement and report to the Board and parties in three months. The review should include a wide range of significant increases in the company's DSM program budget and offerings as well as demand response, delivery contract innovations (such as those proposed by FRPO) and fuel switching.
3. Update analyses of alternatives that may defer or displace the need for Kirkwall-Hamilton reinforcement following issuance of the Board's findings in the EB-2020-0019 IRP proceeding to ensure compliance with those findings and report thereon.

We also take this opportunity to respectfully request an order for payment of costs incurred by intervenors, to the extent not previously addressed by the Board's interim award.

All of which is respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch

Cc: M. Millar, Z. Crnojacki, all parties