

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

October 26, 2020

**Re: EB-2019-0159 2021 Dawn Parkway Expansion Project
Pollution Probe Submission Regarding Enbridge Withdrawal Request**

Dear Ms. Long:

Pollution Probe has received the submission of the Green Energy Coalition (GEC) with respect to recommended conditions of withdrawal for this Application, and the related submissions from other parties that highlight rationale and benefits supporting the OEB's inclusion of the conditions outlined by GEC.

Pollution Probe supports the proposal put forward by GEC and has provided context below for the OEB to consider as it reviews Enbridge's request for application withdrawal. A modern approach is required to assess future energy planning and infrastructure approvals in a more integrated manner and with community energy needs (including increasing renewable alternatives). The old approach used for decades is no longer prudent for assets that will be recovered from Ratepayers well past 2050. Municipalities across Ontario have embraced more effective energy and emissions planning and the results are having a profound impact on the need for additional fossil fuel infrastructure for the long term. It is important that Ontario does not lose this opportunity to learn from the Dawn-Parkway project and ensure that any future application (and related proceedings such as the generic IRP proceeding) can leverage the learnings that led to Enbridge's request for application withdrawal. We are all aware of the impacts of COVID over the past year, but these assets would be in service for over half a century and the trends leading to decreased natural gas demand go far beyond COVID. COVID has simply enhanced awareness of a larger systematic trend.

Enbridge outlined in its application that there was not sufficient time to consider proper IRP alternatives and in its application withdrawal request Enbridge indicated that it intends to reassess the need for the project in 2021 and expects to bring forward a new application for OEB approval. Had the \$204 million pipeline project been approved by April 30, 2020 per Enbridge's original request, it would have resulted in significant stranded assets. The OEB process set sufficient time to thoroughly assess the application, including local public consultation which ultimately led Enbridge to conduct an updated analysis and conclude that there is not sufficient current need for this project. The outcome is a win-win for everyone.



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In alignment with Procedural Order No. 7, dated May 19, 2020 Pollution Probe suspended all activity on this proceeding including work with its expert witness. Pollution Probe requests OEB consideration for the residual balance of its cost claim submitted June 2, 2020.

Please reach out should you have any questions.

Respectfully submitted on behalf of Pollution Probe.

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cc: All Parties (via e-mail)