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November 19, 2020

Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON
M4P 1E4

Dear Ms. Long

**RE: EB-2020-0181 Enbridge Gas 2021 Rates ICM Application
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2020-0181 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval for Incremental Capital Module (ICM) funding of certain capital projects in 2021 rates.

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website.

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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In this proceeding Enbridge Gas is seeking ICM funding from ratepayers including the supporters of Energy Probe for three capital projects: the St Laurent NPS 12 Replacement in the EGD rate zone, and the London Line Replacement Project and the Sarnia Industrial Reinforcement Project in Union rate zones.

- In support of its application for ICM funding, Enbridge Gas has filed its calculations of the Materiality Threshold Test for the EGD Rate Zone and for the Union Gas Rate Zone. Energy Probe is concerned that the input data used in the tests may not be appropriate.
- Enbridge claims that it has insufficient means for funding these projects and therefore needs funding from ratepayers. Energy Probe is concerned that the input data used in the Means Test supporting the claim is not appropriate.
- Enbridge claims that the three projects are discrete and material projects. Energy Probe is concerned that some of the projects are not discrete projects but are a grouping of projects.
- Energy Probe is also concerned that the cost estimates of the three projects are excessive and if approved will result in recovery of costs from ratepayers that ratepayers are also being charged in base rates.
- Enbridge is also seeking OEB approval of its Utility System Plan (USP) including which includes its Asset Management Plan. Energy Probe is concerned that the timing and the cost of planned capital expenditures will have a large upward pressure on gas distribution rates. Energy Probe believes that cumulative rate impacts should be considered in the evaluation and approval of the USP.

Hearing

Energy Probe believes that a written hearing consisting of a single round of interrogatories followed by the submission of arguments would not result in an adequate evidentiary record for the OEB to reach a decision on the issues in this case. Considering the amount of evidence filed by Enbridge Gas and its importance, Energy Probe submits that an appropriate regulatory process should include the following steps:

1. interrogatories,
2. technical conference (virtual),
3. responses to undertakings from the technical conference, and
4. submission of written arguments.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to consultants:

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| Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com | Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com |
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Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe

cc. Enbridge Gas Inc. (Regulatory Proceedings)
Patricia Adams (Energy Probe Research Foundation)
Roger Higgin (Sustainable Planning Associates Inc.)

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