

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

November 23, 2020

Re: EB-2020-0094 Harmonized System Expansion Surcharge, Temporary Connection Surcharge and Hourly Allocation Factor - Pollution Probe Submission pertaining to the Draft Rate Order

Dear Ms. Long:

In accordance with the OEB's Decision and Order, dated November 5, 2020 for the above noted proceeding, the following is Pollution Probe's submission pertaining to the Draft Rate Order. Pollution Probe has also had an opportunity to review the submission by OEB Staff on November 23, 2020 and supports the changes proposed by OEB Staff.

Additionally, Enbridge has referenced the Company's feasibility policy throughout the Draft Rate Order. The Draft Rate Order includes wording meant to align with the OEB's Decision in this proceeding and includes additional wording such as "in accordance with the Company's feasibility policy". In its Decision, the OEB indicated that there will be benefit in reviewing the Enbridge feasibility policies (currently legacy Enbridge Gas and Union Gas) prior to any OEB approval of policies changes. As a stand-alone document, the Draft Rate Order could be interpreted and applied (mistakenly) as OEB approval of the Company's feasibility policy. One option is to remove references to the feasibility policy or another option is to add a footnote or reference to point to the last OEB approved version of the Company feasibility policy that applies. This would remove the potential for confusion until the OEB has a chance to review a feasibility policy for the merged utility in its next rebasing application.

Respectfully submitted on behalf of Pollution Probe.



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