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November 26, 2020

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

Dear Ms. Long,

**RE: EB-2020-0198 Enbridge Gas NPS 20 Waterfront Relocation LTC 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-2020-0198 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its NPS 20 Waterfront Relocation Project Leave to Construct Application.

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

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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>

In this proceeding Enbridge Gas is seeking OEB approval of its Leave to Construct application for the NPS 20 Waterfront Relocation Project. In its application, Enbridge filed evidence of its efforts to have Waterfront Toronto pay for the relocation costs of Enbridge facilities. Energy Probe hopes that Enbridge will be successful. However, if Enbridge is not successful, it is likely that Enbridge will seek Incremental Capital Module funding from ratepayers including the supporters of Energy Probe. Accordingly, the interests of Energy Probe in this proceeding are the following:

- the need for the relocation,
- the relationship of this project to other Enbridge Gas projects in the area,
- the process used in the identification and the evaluation of relocation alternatives,
- the selection of the proposed alternative,
- the cost estimate,
- the construction schedule, and
- the efforts to obtain funding from Waterfront Toronto.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe believes that it can be in written form.

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

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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 its consultant:

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
41 Divadale Drive
Toronto ON
M4G 2N7
Tel: 416 423-3685
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Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Joel Denomy (Enbridge Gas Inc.)
Ritchie Murray (OEB Staff)
Enbridge Gas Inc. (Regulatory Proceedings)