

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

November 27, 2020

**Re: EB-2020-0198 – Enbridge Waterfront Relocation Project Leave to Construct  
Pollution Probe Intervention Request**

Dear Ms. Long:

Pollution Probe is in receipt of the notice for the above noted proceeding and hereby applies for intervenor status and requests that it be eligible for the recovery of reasonably incurred costs for its participation. Pollution Probe has been an active participant in facility proceedings, including Leave to Construct applications. Pollution Probe represents the direct interests of consumers and an interest and policy perspective relevant to the Board's mandate in this proceeding.

Pollution Probe is a frequent intervenor in Board proceedings and a copy of the current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/687123/File/document>

**Goals and Objectives**

Pollution Probe intends to actively participate in all aspects of this proceeding with a focus on the following areas.

- Environmental and Socio-economic issues related to the proposed project. This is a busy multi-use location near the Don River and Distillery District. The area roadways, paths and bicycle infrastructure is highly traveled and an integrated access point to several other waterfront corridors. This location is also contaminated both within road allowance and on the adjacent lands owned by Enbridge (previous coal gasification site). Special consideration is required to mitigate environmental and socio-economic impacts related to the proposed project.
- Financial impacts (including proposed costs and capital treatment) and risks for project recovery. Waterfront Toronto is the overall (Federal, Provincial and municipal) coordinating body for Toronto's waterfront development and most of the the lands impacted by the project are owned by the City of Toronto. It will be important to ensure that treatment of proposed project costs are clear, especially since the OEB does not have authority over Waterfront Toronto, a federal corporation. Given the amount of current and future planning in this area, it will also be important to avoid additional relocations through effective consideration now.

## **Intention to Seek Cost Awards**

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects, such as on community energy planning, future of natural gas and regulated utility innovation, from a variety of public and private sources. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible. Pollution Probe has been an active and valuable participant in proceedings before the Ontario Energy Board and will continue to coordinate its activities, where appropriate, with other parties which represent consumer, community and environmental interests in Ontario.

## **Notice**

Pollution Probe requests that further communications with respect to this matter be sent to:

Michael Brophy  
Michael Brophy Consulting Inc.  
Consultant for Pollution Probe  
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Respectfully submitted on behalf of Pollution Probe.



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Guri Pannu, Senior Legal Counsel, Enbridge (via email)  
Richard Carlson, Pollution Probe (via email)