

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

December 30, 2020

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning Proposal
Pollution Probe Letter of Comment**

Dear Ms. Long:

Pollution Probe is in receipt of the Enbridge letter dated November 27, 2020 and the OEB's Procedural Order No. 7, dated December 2, 2020. Pollution Probe would like to thank the Board for acknowledgement of its letter dated November 9, 2020 and the concerns identified. Pollution Probe has had an opportunity to review the evidence filed by all stakeholders, including the Reply Evidence filed by Enbridge on December 11, 2020. Pollution Probe is supportive of the process laid out in Procedural Order No. 7 for the next stage of the proceeding and believes that it provides a fair and equal process for the next stage of the proceeding.

The majority of the Enbridge's November 27th letter was focused on the comments provided by Pollution Probe. Pollution Probe is not intending to repeat those comments or to respond to the positions taken by Enbridge in its letter. After reviewing the evidence filed by parties and reply evidence filed by Enbridge, it is sufficient to say that the issues raised in the Pollution Probe letter were valid and that many of the concerns identified have been mitigated through the process laid out by the OEB in Procedural Order No. 7.

Pollution Probe wanted to also take this opportunity to clarify its intention to file evidence and to participate in the next phase of the process outlined by the OEB. Pollution Probe identified several options to resolve issues or gaps in its November letter and the potential to file additional evidence was just one option for potential consideration. Pollution Probe intentionally indicated in its August 4, 2020 letter that "Pollution Probe is not proposing to develop additional evidence at this time. Should gaps remain following the filing of the reports outlined above, Pollution Probe will assist in helping to fill those gaps as appropriate". Given the uncertainty in August in what specifically would be included in parties' evidence or reply evidence, Pollution Probe did not think that it would be cost-effective or practical to commission expert evidence at that time. Commissioning expert evidence is a difficult and time-consuming task and comes with the risk that costs incurred may not be fully recovered. Utilities generally do not carry those same risks since they do not submit a Cost Claim as part of their cost recovery process. In some cases cost claims have also been compared to stakeholder cost averages which can have the effect of putting higher risk on more active participants. In Pollution Probe's opinion cost claim averages should not be used for assessing the costs of parties that are more active, including filing evidence, best practice materials, or consolidating input on behalf of groups of stakeholders. In this proceeding those risks may be mitigated since the OEB has specifically invited parties to be more active, including collecting and sharing best practice information relevant to IRP in Ontario.

Pollution Probe is continuing to coordinate with several parties including consumers, communities, partners and other related stakeholders on this very important proceeding and this approach has provided an efficient conduit for input from parties that do not have the capacity to participate directly. Pollution Probe has also been collecting input from those stakeholders so that it can be included in the February presentation. Pollution Probe requests that the OEB consider the time requirements to communicate consolidated information and input as it plans the future details for the proceeding. For example, it could take longer to present the consolidated information from many parties. Typically, the OEB has solicited time estimates from parties in advance of presentations and this approach could be helpful for the February presentations.

Respectfully submitted on behalf of Pollution Probe.



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