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April 7, 2021

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

Dear Ms. Long

**RE: EB-2020-0293 Enbridge Gas St. Laurent Ottawa North Replacement Project
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-2020-0293 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for Leave to Construct approval of its proposed St. Laurent Ottawa North Replacement Project.

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>

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If the proposed St. Laurent Ottawa North Replacement Project is approved and built, residential customer supporters of Energy Probe will ultimately be required to pay for it in gas distribution rates. Energy Probe, therefore, has a direct interest in the purpose, need and timing of this project, the selection of the preferred alternative, and the construction cost estimate.

Energy Probe's Specific Concerns with the St. Laurent Ottawa North Replacement Project

Enbridge Gas has indicated that it plans to apply for ICM funding from ratepayers including Energy Probe supporters for the St. Laurent Ottawa North Replacement Project in its 2022 rates application. When an electricity distributor applies for ICM funding for a project, it presents the supporting evidence for the project in its rates application allowing intervenors to test the evidence. However, Enbridge only presents summary evidence for a project for which it is seeking ICM funding in its rate case. This severely limits the ability of intervenors to test the evidence unless they also intervene in the LTC proceeding, particularly if the OEB decision in the LTC proceeding precedes the rates proceeding. Energy Probe is concerned that the St. Laurent Ottawa North Replacement Project is not a single discrete project but a grouping of several projects into a single project with the purpose of obtaining ICM approval. Energy Probe is also concerned that Enbridge did not provide an appropriate analysis of alternatives to the proposed project.

Energy Probe understands that the EB-2020-0293 proceeding will not deal with ICM issues, which will be dealt with in the 2022 rates proceeding. However, a Leave to Construct approval in the EB-2020-0293 proceeding that would approve the purpose, the need, the timing, and the cost of the St. Laurent Ottawa North Replacement Project would make it difficult for Energy Probe to argue in the 2022 rates proceeding that the project does not meet ICM criteria. For these reasons Energy Probe requests that it be allowed to intervene in the EB-2020-0293 proceeding.

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 evidence filed by Enbridge Gas Inc. 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,

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4. settlement conference, and
5. 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:

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.

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

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