

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

April 9, 2021

**Re: EB-2020-0293 – Enbridge St. Laurent Ottawa North Replacement Project
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 also works collaboratively with organizations including the Clean Air Partnership, which also represents consumers and communities impacted by the proposed project.

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.

- Financial (including proposed capital treatment), environmental and socio-economic impacts related to the proposed pipeline (and abandonment if Enbridge requests OEB approvals specifically related to the proposed abandonment).
- Scope and need of the proposed project, including OEB approval related to the pipeline abandonments and ancillary facilities. It appears that the project was developed and assessed as two separate projects, specifically the St. Laurent Phase 3 and Phase 4. The application appears to be a combination of information related to both of these projects using separate route selection and environmental assessments.
- The application includes 16 km of Nominal Pipe Size (NPS) 12 inch extra-high pressure (XHP) steel (ST) natural gas main and approximately 400m of NPS 16 XHP ST natural gas main in the City of Ottawa. The Proposed Preferred Routes cross several watercourses and wetland areas. It appears that Exhibit C, Tab 1, Schedule 1, Attachment 1 (original project and route selection Environmental Report) has not yet been filed in this application. The Environment Report Amendment was filed as Exhibit C, Tab 1, Schedule 1, Attachment 2 and refers to the missing document. It is our understanding that the new

RESS filing system has removed issues with file sizes where OEB Staff have previously needed to coordinate with Enbridge to file the Environmental Report on the public webdrawer for the proceeding. There also does not appear to be a detailed mitigation plan related to either phase of the project.

- The St. Laurent Project Phase 3 was recently withdrawn from the Enbridge 2021 ICM proceeding after the OEB raised concern that the project phases should be assessed in a more integrated manner. Additionally, the OEB EB-2020-0192 Decision dated January 28, 2021 (page 20) states: “The OEB acknowledges that more direction is likely to be provided to Enbridge Gas in future leave to construct projects as part of the ongoing IRP proceeding. In the interim, however, the OEB believes that all parties would be assisted if Enbridge Gas would, in the future, undertake in-depth quantitative and qualitative analyses of alternatives that specifically include the impacts of DSM programs on the need for, or project design of facilities for which Enbridge Gas has applied for leave to construct.”. The St. Laurent North project represents Enbridge’s first Leave to Construct application following the OEB’s direction in the EB-2020-0192 Decision and sets a precedent for what the OEB will accept as in-depth quantitative and qualitative analyses of alternatives. It is Pollution Probe’s understanding that the OEB’s statement of requirements for in-depth quantitative and qualitative analysis, including DSM alternatives, must be applied to the St. Laurent Ottawa North Leave to Construct application. No such analysis was provided for the proposed project as filed.

Pollution Probe recommends that the OEB convene a Stakeholder Conference prior to issuing a complete procedure for this proceeding. This is not a straight forward application and it is not clear if it meets the OEB requirements as outlined in the EB-2020-0192 Decision. A stakeholder Conference would also ensure all relevant issues are identified so that an issues list can be developed to guide the proceeding. This clarity will save time and costs throughout the process.

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
28 Macnaughton Road
Toronto, Ontario M4G 3H4
Phone: 647-330-1217
Email: Michael.brophy@rogers.com



150 Ferrand Drive, Suite 208
Toronto, Ontario M3C 3E5
T 416.926.1907 F 416.926.1601
www.pollutionprobe.org

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Email: Michael.brophy@rogers.com

cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Guri Pannu, Enbridge Legal (via email)
Richard Carlson, Pollution Probe (via email)