

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

April 12, 2021

**Re: EB-2021-0072 2019 DSM Deferral and Variance Account Disposition Application**

Dear Ms. Long:

Pollution Probe received the notice for the above noted proceeding as a participant in related proceedings defined in the Letter of Direction and hereby applies for intervenor status and requests that it be eligible for the recovery of reasonably incurred costs for its participation. Pollution Probe represents a direct consumer and policy interest related to this proceeding.

Pollution Probe is a frequent intervenor in Board proceedings including those related to DSM<sup>1</sup> and a copy of our current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

**Goals and Objectives**

Pollution Probe intends to focus on the basis of the 2019 DSM Deferral and Variance Accounts requested for clearance. The amounts requested for clearance totals approximately \$22.3 million. A portion of the accounts requested to be cleared in this proceeding relate to the scope and content of the 2019 Natural Gas DSM Annual Verification Report. As such, a copy of the report should be filed in this proceeding with details on what portions of the 2019 DSM Deferral and Variance Account amounts have been specifically verified. Additional support may be required for details related to the account balances not verified through the existing OEB verification process. It is not possible based on the evidence currently filed to determine what portion of the DSM savings and related account balances were covered by the 2019 Natural Gas Demand Side Management (DSM) Annual Verification Report. This proceeding provides the only public consultation to review and validate the basis and amounts in the 2019 DSM Deferral and Variance Accounts.

Pollution Probe intends to participate in all pre-hearing procedures, including interrogatories, technical conferences, or settlement conference, as the Board may direct. Pollution Probe supports Enbridge's request for a written hearing.

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<sup>1</sup> Including related DSM proceedings referenced in the March 23, 2021 Letter of Direction to Enbridge from the Ontario Energy Board. Also see EB-2021-0072 EGI\_Affidavit\_20210324.

### **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, municipal and environmental interests in Ontario.

Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

### **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](mailto:Michael.brophy@rogers.com)

Respectfully submitted on behalf of Pollution Probe.



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Michael Brophy, P.Eng., M.Eng., MBA  
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Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

cc: Ms. Asha Patel, Enbridge Regulatory (via email)  
Dennis O'Leary, Aird & Berlis (via email)  
Josh Wasylyk (via email)  
Richard Carlson, Pollution Probe (via e-mail)