

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

September 15, 2021

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning
Pollution Probe Cost Claim Reply**

Dear Ms. Long:

In accordance with the OEB Decision and Order dated July 22, 2021, Pollution Probe submitted its Costs Claim for the above-noted proceeding. On September 9, 2021 Enbridge submitted its cost claim objection letter and noted that the costs claims of several intervenors (including Pollution Probe) was higher than the average cost claim. The following is the Pollution Probe reply to the issues raised.

Pollution Probe intends to only directly respond to comments made pertaining to the Pollution Probe Cost Claim. However, it should be noted that some stakeholders were significantly more active in this proceeding and the value and outcomes of the proceeding would have been diminished without their participation. For example, Mr. Neme (GEC witness and author of GEC evidence) was invaluable during the proceeding and in Pollution Probe's opinion was the most knowledgeable, credible and valuable expert witness presented in the proceeding. High value for ratepayers given the millions (and likely billions) of dollars this proceeding will help mitigate.

The assertions Enbridge put forward in its objection letter are fundamentally flawed. Comparing the average of the most active intervenor cost claims against the least active intervenor cost claims is simply wrong and appears disingenuous. Pollution Probe participated fully in the proceeding and the value of its participation was recognized by the OEB several times, including adopting specific enhancements to the proceeding recommended by Pollution Probe¹. The final Decision has direct links to evidence, interrogatories and positions Pollution Probe provided during the proceeding. Comparing Pollution Probe costs again stakeholders that did not attend the oral hearing, submit evidence, provide interrogatories or present during the OEB Presentation Day is unfair and not appropriate.

The OEB approved Pollution Probe to collect and submit best practice evidence (as appendix documents to the interrogatory process) in order to ensure that a more fulsome amount of best practices were available. Pollution Probe researched, collected and filed eight best practice evidence documents for the hearing that represented local, Canadian and North American best practice elements. Since this evidence related to core issues for the oral hearing, it was allocated to the oral hearing preparation classification for cost claim purposes (in contrast to a separate cost sheet used by GEC for Mr. Neme's evidence). Enbridge's letter also incorrectly captures the number of questions raised by Pollution Probe through interrogatories. Pollution Probe provided over 30 questions to just Enbridge during the

¹ <https://www.rds.oeb.ca/CMWebDrawer/Record/693217/File/document> - PollutionProbe_Comments_20201109

interrogatory process and grouped these questions by subject to be more efficient. When considering the full interrogatory process, Pollution Probe provided 90 questions in total. Pollution Probe validated time allocation with OEB Staff and has received confirmation that those allocations by activity are appropriate (OEB Staff provided the supplemental breakdown). The interrogatory issues raised by Pollution Probe resulted in greater clarity, transparency and are directly related to issues impacting the OEB's Decision in this proceeding.

The approach Pollution Probe took was the most cost-effective approach. In its December 30, 2020 letter, Pollution Probe provided the rationale for its approach and why it was the most cost-effective approach. Also, Pollution Probe indicated that it coordinated 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 also collected input from those stakeholders to provide a consolidated February 2021 presentation which resulted in a valuable discussion and questions from the panel.

This proceeding was one of the most important and potentially impactful initiatives that the OEB has undertaken this decade. That guided the high level of importance and participation from Pollution Probe and the partners we collaborated with in the proceeding. The importance of this proceeding has already started to be reflected in the recent OEB Discussion Paper on CDM and several other OEB initiatives (e.g. FEI, RPPAG, etc.) which are striving to modernize energy planning in Ontario. High value that will help the OEB meet its goals of modernization and innovation.

Pollution Probe confirms that the hours in its Cost Claim are accurate and reasonable. Pollution Probe participated responsibly in the process; contributed to a better understanding of issues; provided a unique and incremental value (including as a consolidator for other stakeholders); complied fully with the Board's orders and direction, and avoided duplication with other parties. Pollution Probe respectfully requests OEB approval of its Cost Claim for this proceeding. Please do not hesitate to reach out should you have any questions.

Respectfully submitted on behalf of Pollution Probe.



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