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November 18, 2021

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

Dear Ms. Long,

**RE: EB-2021-0148 Enbridge Gas Inc. 2022 Rates Phase 2 and ICM Funding
Application - 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-2021-0148 proceeding, Phase 2 of the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its 2022 rates.

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 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>

Energy Probe's interest in this proceeding is the impact on ratepayers the 2022 rates proposed by Enbridge Gas in Phase 2. In this proceeding Enbridge Gas is seeking ICM funding from Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

ratepayers including the supporters of Energy Probe for five projects in 2022. One of the projects is EB-2020-0293 St. Laurent Ottawa North Replacement Project. Energy Probe is an intervenor in the EB-2020-0293 proceeding.

Enbridge claims that it has insufficient means for funding these five projects and therefore needs funding from ratepayers. Energy Probe is concerned that some of the data used in supporting the claim is not appropriate.

Enbridge claims that the five projects are discrete and material projects. Energy Probe is concerned that some of the projects are not discrete projects but are a grouping of projects and therefore do not meet the criteria for ICM funding.

Enbridge has filed an addendum to its Asset Management Plan. Energy Probe is concerned that the Addendum raises into question the significance of the Asset Management Plan that was filed by Enbridge in the EB-2020-0181 proceeding for approval of its Phase 2 rate increase for 2021.

Energy Probe was an intervenor in the EB-2021-0147 Enbridge Gas Phase 1 application for approval of 2022 rates and believes that the OEB should consider the cumulative impact on ratepayers of increases in rates caused by the Enbridge practice of using two phases for its rate increases. Energy Probe is not aware of any other Ontario utility that uses a multi-phase process for annual rate increases.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations and that a hearing will not be necessary. However, if a hearing is required, Energy Probe plans to be an active participant in the hearing, whether it is in an oral or written form.

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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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.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

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