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March 30, 2022

Nancy Marconi
Registrar, Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2022-0003 Enbridge Gas NPS 20 Waterfront Relocation 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-2022-0003 Enbridge Gas NPS 20 Waterfront Relocation Project Leave to Construct proceeding.

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>

In this proceeding Enbridge Gas is seeking OEB approval of its Leave to Construct application for the NPS 20 Waterfront Relocation Project. Energy Probe was an intervenor in the EB-2020-0198 proceeding for the NPS 20 Waterfront Relocation Project LTC which was withdrawn. In that proceeding Energy Probe supported efforts by Enbridge to obtain funding from Waterfront Toronto for the costs of the relocation.

In the EB-2022-0003 application Enbridge filed evidence of its cost sharing agreement with Waterfront Toronto. The portion of relocation costs not paid by Waterfront Toronto will be paid by Enbridge and recovered from ratepayers, including the supporters of Energy Probe. The

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

interests of Energy Probe in this proceeding are the following: the process used in the identification and evaluation of relocation alternatives, the selection of the proposed alternative, the cost estimate, and the cost sharing agreement with Waterfront Toronto.

Hearing

Energy Probe hopes that all issues can be resolved through settlement negotiations. However, if a hearing is required, Energy Probe believes that a written hearing would be appropriate.

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 in this proceeding and required by Energy Probe, should be directed to its consultant:

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
41 Divadale Drive
Toronto ON, M4G 2N7
Tel: 416 423-3685
tom.ladanyi@rogers.com

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Dave Janisse (Enbridge Gas Inc.)