

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

May 9, 2022

**EB-2022-0086 – Dawn to Corunna Replacement Project Leave to Construct
Pollution Probe Intervention Request**

Dear Ms. Marconi:

Pollution Probe received 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 represents a direct consumer and policy interest related to this proceeding.

Pollution Probe is a frequent intervenor in Board proceedings, including facility Leave to Construct applications and a copy of our current Annual Filing can be found on the Board's website at the following location:

<https://www.rds.oeb.ca/CMWebDrawer/Record/724793/File/document>

Enbridge has indicated a desire for confidential treatment of certain information in its application. One such area is information related to the Indigenous Consultation Log and associated attachments information in Exhibit H-1-1 Attachment 6. Enbridge indicates that "The information is commercially sensitive, and its disclosure could prejudice the competitive position of Enbridge Gas in its negotiations with Indigenous groups". Much of the redacted information relates to consultation and issues related to the draft Environmental Report. For example, page 83 of Appendix 6.

Pollution Probe recommends that the OEB wait until after the interrogatory phase of the proceeding is complete to determine if oral hearing elements are required or if a written approach is sufficient.

Goals and Objectives

The proposed 20 kilometer NPS 36 project is a significant project in terms of scale, costs and potential impacts. As identified by Enbridge, the storage facilities and related pipeline infrastructure are a core element of providing cost effective natural gas to Ontario communities and consumers. Pollution Probe intends to participate in all aspects of this proceeding with a focus on need, costs, routing, alternatives and net Environmental and Socio-economic issues related to the proposed project.

Pollution Probe notes that the Environmental Report was not filed in support of this application, but a weblink was provided in Exhibit F Tab 1 Schedule 1 of the Application. It is standard practice to file the Environmental Report on the public record and the OEB electronic filing system (RESS) enhancements were developed to enable those documents to be filed. It is requested that the Environmental Report be

added to the public record (i.e. OEB web docket) for this proceeding. Additionally, the Enbridge website version of the Environmental Report references multiple appendices that do not appear to be posted. Those documents form part of the Environmental Report and it is recommended that all relevant documents be filed via RESS.

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

Respectfully submitted on behalf of Pollution Probe.



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Cc: Adam Stiers, Enbridge Regulatory (via email)
Tania Persad, Enbridge Legal (via email)
Richard Carlson, Pollution Probe (via: email)