

Elson Advocacy

July 6, 2022

BY RESS

Nancy Marconi

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

Re: EB-2022-0028 – EPCOR Electricity Distribution Ontario Inc. – Application to raise electricity distribution rates

We are writing on behalf of Environmental Defence to request intervenor status and costs eligibility in the above proceeding as a leading environmental organization that represents both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through measures that lower both costs and decrease environmental impacts.

Nature and Scope of Intended Participation and Interest in Proceeding

Environmental Defence wishes to file interrogatories, participate in the hearing, review and test the evidence, make submissions, and seek a cost award. Environmental Defence will seek to file evidence in this proceeding.

Environmental Defence's interests in this proceeding are promoting steps that protect customers, lower energy bills, and further environmental goals, such as prudent gas infrastructure planning that accounts for the possibility of assets being prematurely stranded or underutilized due to decarbonization-related market forces or government regulation. Environmental Defence wishes to address important issues relating to this mandate such as:

- Whether the proposed capital spending is appropriate;
- Whether the proposed depreciation periods are appropriate in light of the possibility of underutilized or stranded assets due to decarbonization;
- Whether Enbridge's proposed spending relating to energy transition is appropriate;
- Whether Enbridge's proposed harmonized design day assumptions are appropriate;
- Whether Enbridge's proposed spending and plans adequately account for the possibility of underutilized or stranded assets due to decarbonization;

- Whether Enbridge is taking appropriate steps over the application period to protect customers from financial risks associated with decarbonization, such as the possibility of pipes being underutilized or stranded; and
- Other issues relating to the mandate of Environmental Defence.

Oral Hearing

Environmental Defence requests an oral hearing due to the number and complexity of the issues.

Environmental Defence

A. Mandate and Objectives of Environmental Defence

Environmental Defence has been working since 1984 to protect Canadians' environment and human health. Environmental Defence's mandate and objective is to challenge, and inspire change in government, business and people to ensure a greener, healthier and prosperous life for all. Its vision is to create a world Canadians are proud to pass on to their children.

B. Membership and Constituency

Environmental Defence is supported by many thousands of donors across the province and country. It sees its constituency as Canadians who are concerned about the environment and the legacy that we will pass on to our children.

C. Types of Programs and Activities that Environmental Defence Carries Out

Environmental Defence has been highly successful in its public interest advocacy on energy issues. Environmental Defence's environmental work, on issues ranging from toxic chemicals to clean beaches, has led to concrete improvements in the lives of Canadians. For example, the dangerous chemical Bisphenol A ("BPA") is now banned in baby bottles in Canada due to concerns first raised by Environmental Defence in 2007. For many years, Environmental Defence has participated in the federal government's Chemicals Management Plan.

Environmental Defence is also the coordinator of Blue Flag Canada, which certifies beaches so that Ontario families can enjoy this public resource. It also co-founded Blue Green Canada with the United Steelworkers, which promotes green energy initiatives that have positive employment and economic impacts.

Environmental Defence also publishes reports and guides in the area of energy conservation, efficiency, and policy. For example, it has created an interactive online tool to help energy consumers reduce their bills through energy efficiency initiatives. Some further publications include:

- *Building an Ontario Green Jobs Strategy*
- *Ontario's Electricity System, a Background*

- *Canada's Methane Gas Problem: Why strong regulations can reduce pollution, protect health, and save money*
- *Powering up efficiency to get the conservation framework right*
- *The \$2 Billion Question - How Can Ontario Reinvest Cap-and-Trade Proceeds to Meet its Climate Challenge and Grow the Economy?*
- *What to Look for in the Canadian Energy Strategy*
- *Background - Coal and Renewable Energy in Ontario*
- *Building Ontario's Green Economy: A Road Map*
- *Ontario Feed-In Tariff: 2011 Review*
- *The Global Clean Energy Jobs Race: Ontario's Opportunity*
- *Blowing Smoke: Correcting Anti-Wind Myths in Ontario*
- *Faces of Transformation: Jobs, economic renewal and cleaner air from Year*
- *One of Ontario's Green Energy Act*
- *Falling Behind: Canada's Lost Clean Energy Jobs*
- *Greening Canada's Building: Report Card*

These and other reports can be found at <http://environmentaldefence.ca/reports/>.

Requests for Evidence and Addresses of Representative

Environmental Defence requests that electronic copies of the pre-filed materials and all other documents in the proceeding be delivered to the following consultant and counsel:

Electronic copies to:

Jack Gibbons

Ontario Clean Air Alliance
160 John Street, Suite 300
Toronto, Ontario M5V 2E5
Tel: (416) 260-2080 ext. 2
E-mail: jack@cleanairalliance.org

Electronic copies to:

Elson Advocacy

Kent Elson

Amanda Montgomery

1062 College Street, Lower Suite
Toronto, Ontario M6H 1A9
Tel: (416) 906-7305
Fax: (416) 763-5435
E-mail: kent@elsonadvocacy.ca/amanda@elsonadvocacy.ca

We also request that the above individuals be listed on the intervenors' list under Environmental Defence.

Address of Environmental Defence

Environmental Defence's full name and address is:

Environmental Defence Canada Inc.

33 Cecil Street, 1st Floor

Toronto, Ontario M5T 1N1

Tel: (416) 323-9521

Fax: (416) 323-9301

However, please send correspondence and any other materials to both Jack Gibbons and to counsel as the authorized representatives.

Service on other Parties

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Amanda Montgomery', with a stylized flourish at the end.

Amanda Montgomery