



PUBLIC INTEREST ADVOCACY CENTRE
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January 19, 2023

VIA RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Marconi:

Re: EB-2022-0200 Enbridge Gas Inc. (EGI) -Intervenor Evidence

In Procedural Order No. 1 the Board required that parties inform the Board of plans to file expert evidence by January 16, 2023. The Vulnerable Energy Consumers Coalition (VECC) is not proposing to file evidence on any of the issues. A number of parties have indicated they wish to file evidence. As no intervenor evidence has been filed, we clearly cannot take a position as to its veracity, usefulness or concordance with our own positions. However, we support the Board taking a broad approach to its allowance and compensation for its procurement.

This proceeding represents the largest natural gas rebasing case in the history of the OEB. Decisions of the panel will impact almost all natural gas users in the province. In addition to proposed cost increases are changes to rate structure and classifications (harmonized rates) and the establishment of policies for future cost arising out of changes to the natural gas industry due to “zero emission” laws and policies.

The Applicant is advantageously situated from the internal information gathered in running the utility and by the resources to develop proposals. All of which leave intervening parties (and the Board) in a reactive position. The introduction of alternative intervenor evidence helps balance this process to make it not only more fair but also more likely to result in optimal regulatory decisions.

We are specifically interested in the opinions of Drs. Hopkins and Cleary whose evidence will provide alternative insights into EGI’s significant proposal to alter its regulated capital structure. While Board staff have indicated they are also interested in procuring evidence in this regard we do not think this should inhibit the Board from allowing and compensating IGUA with respect to their proposed evidence.

Other parties such as Environmental Defence/Green Energy Coalition, BOMA, FRPO and the School Energy Coalition have put forward proposals for expanding the information available to the Board. We would urge the Board to take a permissive approach to these proposals in order to develop the best record it can in this important proceeding.

Yours truly,

John Lawford
Counsel for VECC