
From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Friday, August 18, 2023 3:42 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: michael.brophy <michael.brophy@rogers.com>
Subject: Intervention Form: EB-2022-0335 - Pollution Probe

Intervention Form

Case Number:

EB-2022-0335

Intervenor Name:

Pollution Probe

Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

Governance Structure:

Refer to the Frequent Intervenor Form below.

Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

Other Contacts:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
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Frequent Intervenor Form:

<https://www.rds.oeb.ca/CMWebDrawer/Record/785648/File/document>

OEB Proceedings:

EB-2023-0003
EB-2022-0007
EB-2022-0200
EB-2022-0160
EB-2022-0074
EB-2022-0111
EB-2022-0302
EB-2022-0249
EB-2022-0248
EB-2022-0203
EB-2021-0183
EB-2021-0243
EB-2023-0071
EB-2023-0111
Excluding:
EB-2023-0062
EB-2022-0285

Issues:

Pollution Probe represents a consumer and policy interest related to this proceeding which is intended to review and approve two IRP pilots in alignment with OEB direction and scope from EB-2020-0091. Pollution Probe intends to participate in all elements of this proceeding including the alignment of projects, financial elements (e.g. estimated costs, efficiency, etc.), project net benefits, monitoring, and consumer impacts.

There is no standard issues list for this proceeding, especially considering that it is the first of its kind in Ontario. Issues that should be considered include pilot scope, timeframe, alignment with OEB IRP Decision, costs, benefits, evaluation, metrics, monitoring and stakeholder engagement. It appears that Enbridge has avoided the inclusion of electric air source heat pumps that were deemed more efficient and cost-effective in the recent OEB DSM Decision. It could be useful for the OEB to consider enabling the inclusion of these technologies in the pilots to provide an assessment of the most modern cost-effective options to Ontario consumers.

Pollution Probe recommends that the OEB carefully consider the procedural process to consider the IRP pilots given the nature of the projects and the OEB's intention that the IRP pilot projects enhance and improve IRP for the future in Ontario. Enabling a process for stakeholder input into the Issue List for this proceeding is an important and essential element to ensure all relevant issues are identified and that the process is transparent, efficient and achieves the results intended. A truncated review process has a high potential for impacting the quality and usefulness of the pilots the OEB ultimately approves, particularly given the lack of experience in implementing successful gas IRP projects in Ontario. These first two pilots are akin to the DSM pilots in the 1990's that set the stage for the broad suite of Ontario-wide DSM programs that benefit Ontario consumers and communities today.

Policy Interests:

Please see above.

Hearings:

It is recommended that the OEB assess the format of the hearing following the interrogatory phase.

An oral hearing (in part) could provide the opportunity for more expedient direction from the OEB. For example, in the recent EB-2022-0200 proceeding the OEB panel provided verbal direction to assist progress in an efficient manner and then several weeks later the written Decision (related to the Phase 1 Settlement Agreement) was officially issued. If OEB resolution of some issues early could remove barriers and enable progress, this could be an efficient approach.

Evidence:

At this time Pollution Probe is not intending on commissioning evidence.

Coordination with Other Intervenors:

Pollution Probe has been an active and valuable participant in OEB proceedings and will continue to coordinate its activities with impacted consumers, intervenors, project stakeholders and other parties as appropriate.

Cost Awards:

Pollution Probe respectfully requests your acceptance of this request to participate and confirmation that it will be eligible for its costs.

Pollution Probe is a not-for-profit charitable organization. We receive individual donations as well as funding for consumer and research projects. Without the prospect of an award of costs, Pollution Probe's ability to participate in the consultation process would not be possible.

Language Preference:

English