

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

September 21, 2023

**EB-2022-0111 Bobcaygeon Community Expansion Project Leave to Construct
Pollution Probe Letter regarding Technical Conference and ED Evidence Proposal**

Dear Ms. Marconi:

The OEB requested comments from stakeholders related to a Technical Conference for the above-noted proceeding. Pollution Probe is also in receipt of the letters from Environmental Defence (ED) and Enbridge pertaining to ED's request to file evidence in this proceeding. Below are Pollution Probe's comments related to both topics.

Technical Conference

The proposed Project is of significant size, risk and complexity. It is unclear if the Project will meet OEB's EBO 188 thresholds based on the current record. As outlined below, there are gaps in information which could be bridged through proceeding with the ED evidence proposal, plus an additional stage in the form of a short Technical Conference and/or Oral Hearing component. Pollution Probe supports the combination of these tools that will provide the best available objective and credible information to the OEB.

Environmental Defence Evidence Proposal

ED's evidence proposal relates directly to issues in scope for this proceeding such as project economics, attachment forecast and alternatives. In Pollution Probe's view there is insufficient information in the application to objectively indicate to the OEB what the likely energy and equipment choices will be made by consumers and businesses in this community. Over-estimation of the natural gas penetration estimate in comparison to relevant modern consumer choices would provide an inaccurate analysis for purposes of the required OEB EBO 188 assessment and could result in increased rate payer risks related to project economics and stranded assets. The most prudent time to consider best available information is during the Leave to Construct proceeding, since after a project is commissioned, it is not possible to turn back the clock on capital expenditures. Enbridge recently indicated that it does not believe that is Enbridge's role (as the monopoly gas utility) to consider non-gas options¹, but consumers certainly do.

Although this application includes a community expansion project, is important to note that every project is not the same and this project in particular is significantly different from recent community

¹ EB-2022-0249 EGI ReplyARG_HV-MBQ-Selwyn_20230823 Paragraph 31.

expansion projects (e.g. community characteristics, baseline technology penetration², scope, cost, dependent facility expansion, etc.). It is not appropriate to broadly rely on past projects to assume what is relevant to this project.

Pollution Probe requests that the OEB allow ED to commission and file the evidence it has proposed, which would help mitigate information gaps and related risks in this proceeding. The choices of consumers is not retrospective, but prospective based on current, objective and unbiased information related to current energy alternatives.

Respectfully submitted on behalf of Pollution Probe.



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² Base on the project survey, this community has a higher trend toward installing heat pumps above those seen in other expansion projects (heat pump penetration is already at 15%).