

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

November 20, 2023

EB-2023-0200 – Sandford Expansion Project Leave to Construct
Pollution Probe Comments

Dear Ms. Marconi:

In accordance with Procedural Order No. 1, please find below Pollution Probe's comments related to the OEB's consideration of a Technical Conference as a next step in this proceeding. Given the issues and nature of the proposed project Pollution Probe suggests that there is value to a Technical Conference and/or short (e.g. 1-2 day) Oral Hearing for this proceeding. One specific area important to the OEB's consideration is the elements that relate to the feasibility (i.e. PI and related inputs). The project PI of 1.0 leaves no safety factor, even after the significant project subsidies and customer surcharge are applied. The OEB is seeing some significant changes in recent proceedings that impact the factors in the PI calculation. These include revenue forecast, project costs, customer choices compared to those predicted by the Enbridge survey, longevity of the project forecast and related consequences when recovery of the proposed capital assets do not include consideration of factors such as Energy Transition or stranding of assets.

Pollution Probe notes the overlap in some of the relevant issues the OEB is considering in EB-2023-0313. On a similar community expansion Leave to Construct proceeding (EB-2022-0111) the OEB decided to place the proceeding into Abeyance until the outcome of EB-2023-0313 is available. There appear to be efficiencies to considering those issues across expansion projects. If the OEB decides to take a consistent approach for this proceeding, it is recommended that the Technical Conference and/or Oral Hearing be conducted following that period.

Respectfully submitted on behalf of Pollution Probe.



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