

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

July 23, 2024

**EB-2024-0187 Boblo Island Expansion Project Leave to Construct
Pollution Probe Letter of Comment**

Dear Ms. Marconi:

Pollution Probe is in receipt of the Notice for EB-2024-0187 and submitted an Intervention request via the OEB system July 9, 2024. Pollution Probe understands that the OEB will be assessing the procedural process prior to issuing Procedural Order No. 1 for this proceeding. The following is input and recommendations on the procedural process for the Boblo Island Expansion Leave to Construct proceeding and all future Expansion Leave to Construct proceeding of a similar nature (i.e. System Expansion applications supported by Natural Gas Expansion Program grants or NGEP).

There has been an unprecedented number of recent Expansion Leave to Construct applications from Enbridge, largely due to the timing related to the NGEP grants. Recent Expansion Leave to Construct projects/proceeding include:

- Haldimand Shores Community Expansion Project - EB-2022-0088
- Selwyn Community Expansion Project - EB-2022-0156
- Mohawks of the Bay of Quinte Community Expansion Project - EB-2022-0248
- Hidden Valley Community Expansion Project - EB-2022-0249
- Bobcaygeon Community Expansion Project - EB-2022-0111
- Neustadt Community Expansion Project - EB-2023-0261
- Eganville Community Expansion Project - EB-2023-0201
- Sandford Community Expansion Project - EB-2023-0200

Through the process of the proceedings noted above, there have been several inefficiencies and opportunities for improvement, efficiency and reduced costs identified. Pollution Probe provides the following request in an attempt to provide recommendations that would improve efficiency/transparency and reduce costs related to the Boblo Island Expansion Leave to Construct proceeding and future Expansion Leave to Construct proceeding of a similar nature (i.e. System Expansion applications supported by Natural Gas Expansion Program grants or NGEP).

Request #1:

Pollution Probe requests that the OEB specifically include in the Procedural Order¹ for the Boblo Island Expansion Leave to Construct proceeding and all future Expansion Leave to Construct proceeding of a similar nature (i.e. System Expansion applications supported by Natural Gas Expansion Program grants or NGEF), recognition of the common nature of the recent Expansion Project Leave to Construct Applications which include NGEF grant funding, and adopt the record from those Expansion Leave to Construct proceedings to avoid duplication and enable a more efficient process.

Request #2:

Pollution Probe recommends that the OEB solicit from Enbridge and publish publicly the list of Expansion Leave to Construct applications that are expected in 2024 and 2025.

Request #3:

Pollution Probe recommends that the OEB combine all remaining project Leave to Construct Applications Expansion (including NGEF grant funding) in 2024 into a single proceeding. The same is recommended to be done for all Expansion Applications Expansion (including NGEF grant funding) in 2025. A more structured, transparent and efficient approach would avoid many of the challenges encountered in the recent Expansion applications and enable a more transparent, aligned and efficient approach.

Respectfully submitted on behalf of Pollution Probe.



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¹ If the OEB decides to issue the PO for Boblo Island as separate from other Expansion proceedings.