



From: Michael Brophy <michael.brophy@rogers.com>
Sent: Friday, August 2, 2024 3:21 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: egiregulatoryproceedings@enbridge.com; Patricia Squires <patricia.squires@enbridge.com>; Guri Pannu <guri.pannu@enbridge.com>; Richard Carlson <rcarlson@pollutionprobe.org>
Subject: Fw: Intervention Form: EB-2024-0200 - Pollution Probe

Please find below a copy of the electronic intervention request form submitted by Pollution Probe for the above-noted proceeding.

Please do not hesitate to reach out should you have any questions.

Mike

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
cell: 647-330-1217

----- Forwarded Message -----

From: Ontario Energy Board <webmaster@oeb.ca>
To: "registrar@oeb.ca" <registrar@oeb.ca>
Cc: "michael.brophy@rogers.com" <michael.brophy@rogers.com>
Sent: Friday, August 2, 2024 at 03:17:03 p.m. EDT
Subject: Intervention Form: EB-2024-0200 - Pollution Probe

Intervention Form

Case Number:

EB-2024-0200

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.
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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/853004/File/document>

OEB Proceedings:

EB-2023-0003
EB-2022-0007
EB-2022-0200
EB-2022-0156
EB-2022-0160
EB-2022-0074
EB-2022-0302
EB-2022-0335
EB-2022-0249
EB-2022-0248
EB-2022-0203
EB-2021-0183
EB-2021-0243
EB-2023-0071
EB-2023-0111
EB-2023-0125
EB-2023-0175
EB-2023-0200
EB-2023-0201
EB-2023-0260
EB-2023-0261
EB-2023-0306
EB-2023-0335
EB-2023-0195
EB-2024-0092
EB-2024-0063
EB-2024-0067
EB-2024-0111
EB-2024-0139
EB-2024-0125
Excluding:
EB-2023-0062
EB-2022-0285

Issues:

Pollution Probe represents a consumer interest related to the Standard Leave to Construct Issues List, including:

- Project Need
- Project Cost and Economics
- Project Routing and alternatives (e.g. ratepayer impacts, environmental and socio-economic impacts and mitigation)

Pollution Probe recognized that this is a major application and that the OEB may solicit input from stakeholders to augment the standard Leave to Construct Issues List for this specific proceeding.

Policy Interests:

Pollution Probe represents a policy interest related to the LTC issues list applicable to this proceeding. Specific project issues include:

- Environmental Impacts
- Socio-economic and environmental policy and other requirements under the OEB's Environmental Guidelines applicable to this specific project.
- Mitigation of environmental and socio-economic impacts in accordance with regulations.
- Consideration of alternatives to the project including IRP alternatives.
- Consideration of OEB guidance from relevant Decisions, including EB-2020-0293 (the last time this project was filed with the OEB)

Enbridge has requested in EB-2024-0111 (Rebasing Phase 2) that the OEB allow Incremental Capital approval for projects into the Leave to Construct proceeding. The Leave to Construct process does not include that element since it has traditionally been part of a rates proceeding (or ICM application). Pollution Probe recommends that the OEB clarify the scope of the EB-2024-0200 proceeding since it does not appear practical to change the scope of a Leave to Construct proceeding until after the OEB has issued its Decision for EB-2024-0111.

Hearings:

This is a major application with significant issues and impacts. The OEB used a full oral hearing process (including a technical conference) last time this project was considered and that is likely appropriate again. The OEB could decide on the exact format following the interrogatory phase, but given the level of complexity, a similar format to EB-2020-0293 is likely required.

The St. Laurent project was previously reviewed by the OEB in a thorough and complex proceeding, and it is recommended that the OEB specifically include (via Procedural Order No. 1) the record from EB-2020-0293 for purposes of this proceeding. This has been done by the OEB previously and would result in the most efficient proceeding possible without largely duplicating the record from EB-2020-0293 in this proceeding.

Evidence:

Pollution Probe intends to commission and file expert evidence in this proceeding and requests that the OEB include a step in the procedural order to accommodate this. Pollution Probe is currently in discussions with other stakeholders to coordinate and avoid duplication. The evidence will provide relevant local expertise on the Energy Transition and energy use in the Ottawa area, related to the proposed project.

Pollution Probe is not requesting specific OEB approval at this time and intends to file a detailed outline of the evidence and related cost estimate following the issuance of Procedural Order No. 1. On receiving cost approval from the OEB, Pollution Probe estimates that completion and filing of the evidence will take approximately 3-4 weeks. Confirmation of timing will be provided in the evidence proposal noted above.

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 Intervenor request 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 this proceeding would not be possible.

Language Preference:

English