

# Elson Advocacy

August 2, 2024

**BY RESS**

**Nancy Marconi**  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700, P.O. Box 2319  
Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas – 2023 DVAs  
EB-2024-0141**

I am writing on behalf of Environmental Defence to request late intervention status in the above proceeding. If granted intervenor status, Environmental Defence would fully comply with the schedule set out in *Procedural Order #1* and cause no delay to the hearing schedule.

Although we now see that we received notice for this hearing, it was missed due to an oversight on my part. I apologise for the oversight. I learned of the oversight this morning and have moved as quickly as possible to submit this intervention request.

Granting this request is warranted in part because it will not cause prejudice to any party or cause delay. Furthermore, Environmental Defence's perspective may provide additional helpful evidence for the OEB to consider. For example, Environmental Defence played a leading role in Phase 1 of the rebasing case with respect to unaccounted-for gas and fugitive emissions. Environmental Defence wishes to explore this issue, the significant costs involved, and whether they are reasonable.

We have submitted a standard intervention form on the OEB website. A copy is attached. Thank you for considering this request.

Yours truly,



Kent Elson

cc: Enbridge

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**Intervention Form: EB-2024-0125 - Environmental Defence**

1 message

**Ontario Energy Board** <webmaster@oeb.ca>  
To: registrar@oeb.ca  
Cc: kent@elsonadvocacy.ca

Fri, Aug 2, 2024 at 5:15 PM

**Intervention Form**

**Case Number:**

EB-2024-0125

**Intervenor Name:**

Environmental Defence

**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/804452/File/document>

## **OEB Proceedings:**

EB-2021-0050 – Hydro One Networks Inc. – 2022 Rate Application  
EB-2021-0110 – Custom IR Application (2023-2027) for Hydro One Networks Inc.  
Transmission and Distribution  
EB-2021-0136 – Hydro One Networks Inc. – Richview to Trafalgar Reconductoring Project  
EB-2021-0147 – Enbridge Gas Inc. – 2022 Rates  
EB-2021-0148 – Enbridge Gas Inc. – 2022 Rates (Phase 2) – Incremental Capital Module  
EB-2021-0205 – Enbridge Gas Inc. – Greenstone Pipeline Project  
EB-2022-0002 – IESO 2022 Revenue Requirement  
EB-2022-0003 – Toronto Waterfront Relocation Project  
EB-2022-0011 – Framework for Review of Intervenor Processes and Cost Awards  
EB-2022-0013 – Alectra Utilities Corporation – 2023 ICM Application  
EB-2022-0024 – Elexicon Energy Inc. – 2023 Distribution Rate Application  
EB-2022-0028 – EPCOR Electricity Distribution Ontario Inc. – Application to raise electricity distribution rates  
EB-2022-0028 – EPCOR Electricity Distribution Ontario Inc. – Application to raise electricity distribution rates  
EB-2022-0059 – PUC Distribution Inc. – Cost of Service Application  
EB-2022-0072 – Consultation to Review Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc.  
EB-2022-0074 – Stakeholder Meeting on Design of an Optional Enhanced Time of Use (TOU) Rate  
EB-2022-0086 – Enbridge Gas Inc. - Dawn to Corunna Pipeline Project  
EB-2022-0137 – IESO 2022 – SME  
EB-2022-0156 – Enbridge Gas Inc. – Selwyn Community Expansion Project  
EB-2022-0157 – Enbridge Gas Inc. – Panhandle Regional Expansion Project  
EB-2022-0200 – Enbridge Gas Inc. 2024 to 2028 Rates Application  
EB-2022-0247 – Enbridge Gas Inc. – Scarborough Subway Expansion – Kennedy Station Relocation Project  
EB-2022-0248 – Enbridge Gas Inc. – Mohawks of the Bay of Quinte First Nation Community Expansion Project  
EB-2022-0249 – Enbridge Gas Inc. – Hidden Valley Community Expansion Project  
EB-2023-0003 – Engagement on Distributor Resilience, Responsiveness and Cost Efficiency  
EB-2023-0071 – Electric Vehicle Integration (EVI)  
EB-2023-2025 – IESO Revenue Requirement Submission (EB-2022-0318)  
Electric Delivery Rates for Electric Vehicle (EV) Charging Report and Invitation to Stakeholder Meeting

Environmental Defence has not been denied intervenor status in an OEB proceeding in the last 24 months.

## **Issues:**

Environmental Defence's primary focus in this proceeding would be:

- (a) Whether Enbridge has filed appropriate details regarding IRP in accordance with OEB directions and any appropriate steps that it should be directed to take in relation to IRP;
- (b) Whether Enbridge has filed appropriate evidence regarding unaccounted for gas and fugitive emissions in accordance with the Phase 1 rebasing settlement and decision and any appropriate steps that it should be directed to take in relation to this evidence; and
- (c) The appropriateness of the proposed 2023 deferral and variance account balances.

## **Policy Interests:**

Environmental Defence's interest in this proceeding is in promoting both the public interest in environmental protection and the interests of consumers whose energy bills can be reduced through measures that lower both costs and environmental impacts.

## **Hearings:**

Environmental Defence takes no position at this time on this issue.

## **Evidence:**

Environmental Defence does not seek to file evidence in this proceeding.

## **Coordination with Other Intervenors:**

Environmental Defence intends to coordinate with other intervenors and anticipates mainly focusing on IRP and unaccounted for gas.

## **Cost Awards:**

Environmental Defence is eligible for a cost award primarily under s. 3.03(b) of the Practice Direction as it primarily represents an interest or policy perspective relevant to the Board's mandate and to the proceeding for which cost award eligibility is sought, namely environmental and climate protection. In addition, with respect to s. 3.03(a) of the practice direction, Environmental Defence also represents the interests of consumers whose energy bills can be reduced through measures that lower both costs and environmental impacts.

## **Language Preference:**

We will participate in English.