



# Intervention Form

## Case Number:

EB-2024-0200

## 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:**

Environmental Defence has been granted intervenor status in numerous proceedings, including these recent proceedings:

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

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

## **Issues:**

- Whether the pipeline is needed;
- Whether there are more cost-effective alternatives;
- Whether Enbridge has undertaken an appropriate Integrated Resource Planning process; and
- Other issues relating to Environmental Defence's core mandate.

## **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, such as least-cost planning that accounts for the potential financial impacts of decarbonization.

## **Hearings:**

Environmental Defence requests that a technical conference be scheduled in this matter. Our experience in leave to construct matters is that there are often a significant number of clarifications and follow-up questions on the interrogatory responses. A technical conference is an efficient way to ensure that the Board has all the information they need to make an evidence-based decision on this matter.

Environmental Defence also requests an opportunity to make submissions on whether an oral hearing is required following the receipt of interrogatory responses.

## **Evidence:**

Environmental Defence requests that the procedural timelines include provision for intervenor evidence proposals. Environmental Defence intends to coordinate with other intervenors to ensure that appropriate evidence is put forward and is seeking an opportunity to have those discussions before determining whether it may sponsor or co-sponsor evidence.

## **Coordination with Other Intervenors:**

It is difficult to speak to coordination without knowing which organizations will intervene in this case. However, in other leave to construct applications relating to gas expansion, other intervenors have referred to and relied on the submissions of Environmental Defence regarding revenue forecast risks.

## **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 do not intend to participate in French.