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**Enbridge Gas Inc.**  
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North York, ON  
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August 20, 2024

BY RESS AND EMAIL

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File: EB-2024-0200  
St. Laurent Pipeline Replacement Project  
Intervention Requests**

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Enbridge Gas has reviewed the intervenor request letters for the above noted proceeding from the following parties:

- City of Ottawa;
- Energy Probe Research Foundation (Energy Probe);
- Environmental Defence (ED);
- Federation of Rental-housing Providers of Ontario (FRPO);
- Independent Electricity System Operator (IESO);
- Industrial Gas Users Association (IGUA);
- Ottawa Community Associations for Environmental Sustainability (CAFES Ottawa);
- Pollution Probe; and
- School Energy Coalition (SEC).

Enbridge Gas has no specific objections to these requests for intervenor status. However, Enbridge Gas does have comments related to the content of the correspondence of both CAFES Ottawa and Pollution Probe.

*CAFES Ottawa Participation and Coordination with Pollution Probe*

Within CAFES Ottawa July 31, 2024 request for intervenor status for the above noted proceeding CAFES Ottawa states that it has been in contact with Pollution Probe and intends to coordinate where practical with Pollution Probe, including on the submission of materials.

CAFES Ottawa's intervention request did not state the areas of the evidence they wish to probe and how its participation will be distinguished from Pollution Probe.

Enbridge Gas requests that CAFES Ottawa provide further details on the areas of the evidence they wish to examine, and the materials they intend to file so it can be considered to ensure there is no unnecessary duplication and that the areas being explored are relevant to the application. Furthermore, Enbridge Gas requests that CAFES Ottawa provide the Issues and Policy Interests they intend to represent to determine how its participation will be distinguished from that of Pollution Probe.

*Pollution Probe's Request that the Record from EB-2020-0293 be Included*

Within Pollution Probe's August 2, 2024 request for intervenor status, Pollution Probe recommends that the OEB specifically include (via Procedural Order No. 1) the record from EB-2020-0293 for purposes of this proceeding. Enbridge Gas does not consent to the adoption of the previous evidence since the current application is wholly a new application (i.e. EB-2024-0200) that is complete and independent of the previous application with evidence, particularly in the areas of need, alternatives and energy transition, that is substantially different than the previous application.

*Pollution Probe's Request to Submit Intervenor Evidence*

Also, Pollution Probe states that it 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.

Enbridge Gas requests that Pollution Probe provide further details on the nature of the evidence that Pollution Probe is requesting to file. As Enbridge Gas does not have the specifics of the proposed evidence, Enbridge Gas reserves its right to object to the relevance of the proposed evidence until the content of the evidence is better understood. As a matter of procedural fairness, Enbridge Gas asks that if the OEB makes provision for the proposed evidence it also makes provision for discovery related to the proposed evidence and for Enbridge Gas to file responding evidence, should Enbridge Gas elect to do so.

If you have any questions, please contact the undersigned.

Sincerely,

*Patricia Squires*

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