



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

August 28, 2024

**EB-2024-0200 St. Laurent Project Leave to Construct  
Pollution Probe Evidence Proposal**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find details on the proposed evidence sponsored by Pollution Probe. The evidence pertains directly to Issue 1 (Need for the Project) and also indirectly relates to other issues on the Issues List (e.g. alternatives). Pollution Probe has coordinated to avoid duplication with the evidence proposal from Environmental Defence which focuses on a different yet complimentary scope.

As outlined below the expert evidence will be prepared by Sustainable Solutions Group (SSG), led by Yuill Herbert (SSG Principal) and Mike Fletcher (SSG Consultant), with support from SSG staff as appropriate. Pollution Probe is the sponsor of the proposed evidence and Pollution Probe has discussed the evidence proposal with Intervenorors that may be considering evidence proposals in order to avoid scope duplication and to ensure synergistic alignment. Pollution Probe will continue to collaborate, where appropriate, with all stakeholders in the proceeding as it progresses to ensure an efficient process.

SSG has been a recognized leader in community energy planning for over 20 years. SSG has supported communities in Ontario and across Canada in analyzing energy demand and low carbon pathways. SSG leadership in this field was recognized in 2022 when they received, jointly with their clients, the [Environment, Climate, & Energy Award and the Policy, Law, or Tool Award from the American Planning Association](#).

SSG was the lead technical consultant for the City of Ottawa's Energy Evolution project. Other recent clients have included Hamilton, ON; Halifax, NS; Saint John, NB; Montréal, QC; Toronto, ON; Halifax, NS and Edmonton, AB. Mike Fletcher was also recognized by the OEB as an energy expert previously, pertaining to the current and future energy needs of the Ottawa area.

SSG will provide a report outlining the current and future energy needs in the Ottawa area and area served by the current St. Laurent system and proposed project. The report will be based on current analysis, information and expertise, such as:

- Community energy needs in the Ottawa area in alignment with Energy Evolution, the City of Ottawa's community energy plan
- Trends and plans impacting energy use in the City of Ottawa and the area impacted by the proposed St. Laurent project

Pollution Probe and SSG will require four weeks from receipt of the Enbridge Interrogatory responses to complete the analysis and file the report. This assumes that OEB approval of the evidence proposal is also received prior to that timeline.

SSG Costs are provided below based on Fixed Costs to develop the report and Variable Costs estimated based on a sample procedural schedule and related workload. Variable Costs will depend on the variable outlined in Table 2. Pollution Probe estimates approximately 25 hours<sup>1</sup> of incremental direct time to coordinate with SSG staff based on the estimated procedural schedule below. This incremental coordination is for administrative and procedural time based on the outline below and is based on those assumptions outlined.

*Table 1: SSG Fixed Costs*

Item	Hours	Rate (\$/hour)	Total
A report providing details on energy planning and related activities in the area impacted by the proposed project, e.g. Ottawa area.	30	330	\$9,900
<i>Sub-total</i>			<i>\$9,900</i>
<i>HST</i>			<i>\$1,287</i>
<b>Total (incl. HST)</b>			<b>\$11,187</b>

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<sup>1</sup> 25 hour x \$330 x HST = \$9,333 in incremental costs.

Table 2. SSG Variable Costs (Note 1)

Item	Hours	Rate (\$/hour)	Total
Technical conference (assumes 4 hour conference for 2 witnesses with 16 hours preparation)	20	330	\$6,600
Oral hearing (assumes 4 hour hearing for 2 witnesses with 16 hours preparation)	20	330	\$6,600
Interrogatory- estimated at 20 questions (including sub-questions) at 0.5 hours per question	10	330	\$3,300
Undertaking- 10 at 1 hour each	10	330	\$3,300
<i>Sub-total</i>			<i>\$19,800</i>
<i>HST</i>			<i>\$2,574</i>
<b>Variable costs (incl. HST)</b>			<b>\$22,374</b>

Note 1: Total costs may vary depending on the schedule and requirements established by the OEB. Estimated costs are as follows:

Table 3. Summary of Estimated Costs

Fixed costs	\$9,900
Estimated variable costs	\$19,800
<i>Sub-total</i>	<i>\$29,700</i>
<i>HST</i>	<i>\$3,861</i>
<b>Total (incl. HST)</b>	<b>\$33,561</b>

Pollution Probe respectfully requests that this evidence and related cost estimate be approved for submission in this proceeding.



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