

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

September 3, 2024

**EB-2023-0343 East Gwillimbury Community Expansion Project Leave to Construct  
Pollution Probe Correspondence**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's Updated Application filed August 30, 2024. Based on a cursory review of the 1059 pages<sup>1</sup>, there are significant changes to the project including a decrease in the scope and number of customers estimated to be interested in attaching to the proposed pipeline (and related economics). As the OEB considers next procedural steps, Pollution Probe offers the following considerations.

Enbridge requested its abeyance prior to responding to Interrogatories being responded to. It would be more efficient to reset that process to give stakeholders an opportunity to review the Updated Application and file updated Interrogatories to ensure that questions link to the Updated information. It is not possible at this time to determine the correlation of the older Interrogatories to the Updated Application.

Pollution Probe has previously noted to the OEB that there has been an unprecedented number of recent Expansion Leave to Construct applications from Enbridge, largely due to the timing related to the NGEF grants. Recent Expansion Leave to Construct projects/proceeding include:

- Haldimand Shores Community Expansion Project - EB-2022-0088
- Selwyn Community Expansion Project - EB-2022-0156
- Mohawks of the Bay of Quinte Community Expansion Project - EB-2022-0248
- Hidden Valley Community Expansion Project - EB-2022-0249
- Bobcaygeon Community Expansion Project - EB-2022-0111
- Neustadt Community Expansion Project - EB-2023-0261
- Eganville Community Expansion Project - EB-2023-0201
- Sandford Community Expansion Project - EB-2023-0200

Through the process of the proceedings noted above, there have been several inefficiencies and opportunities for improvement, efficiency and reduced costs identified. Pollution Probe provides the following request in an attempt to provide recommendations that would improve efficiency/transparency and reduce costs related to the East Gwillimbury Expansion Leave to Construct

---

<sup>1</sup> Updated Application is 468 pages and the Updated Environmental Report is 591 pages.

proceeding and future Expansion Leave to Construct proceeding of a similar nature (i.e. System Expansion applications supported by Natural Gas Expansion Program grants or NGEP).

Request #1:

Pollution Probe requests that the OEB specifically include in the Procedural Order<sup>2</sup> for the East Gwillimbury Expansion Leave to Construct proceeding and all future Expansion Leave to Construct proceeding of a similar nature (i.e. System Expansion applications supported by Natural Gas Expansion Program grants or NGEP), recognition of the common nature of the recent Expansion Project Leave to Construct Applications which include NGEP grant funding, and adopt the record from those Expansion Leave to Construct proceedings to avoid duplication and enable a more efficient process.

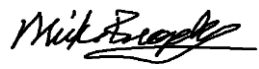
Request #2:

Pollution Probe recommends that the OEB solicit from Enbridge and publish publicly the list of Expansion Leave to Construct applications that are expected in 2024 and 2025.

Request #3:

Pollution Probe recommends that the OEB combine all remaining project Leave to Construct Applications Expansion (including NGEP grant funding) in 2024 into a single proceeding. The same is recommended to be done for all Expansion Applications Expansion (including NGEP grant funding) in 2025. A more structured, transparent and efficient approach would avoid many of the challenges encountered in the recent Expansion applications and enable a more transparent, aligned and efficient approach.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA  
Michael Brophy Consulting Inc.  
Consultant to Pollution Probe  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Cc: Enbridge Regulatory (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

---

<sup>2</sup> If the OEB decides to issue the PO for East Gwillimbury as separate from other Expansion proceedings.