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**Enbridge Gas Inc.**  
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Canada

September 10, 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” or “the Company”)  
Ontario Energy Board (“OEB”) File: EB-2023-0343  
East Gwillimbury Community Expansion Project (the “Project”)  
Comments on Pollution Probe’s Letter**

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Enbridge Gas is in receipt of Pollution Probe’s (“PP”) September 3, 2024 letter wherein PP submits several requests to the OEB regarding the Company’s leave to construct applications supported by the Natural Gas Expansion Program (“NGEP”).

Enbridge Gas submits that the OEB should reject PP’s requests, as described in more detail below.

*PP Request #1*

PP requests that the OEB include in a Procedural Order for the Project’s Leave to Construct (“LTC”) proceeding and all future community expansion LTC proceedings of a similar nature (i.e. system expansion applications supported by NGEP), recognition of the common nature of the recent community expansion project LTC applications which include NGEP grant funding, and adopt the record from those proceedings to avoid duplication and enable a more efficient process.

Enbridge Gas submits that the OEB should reject PP’s request as the records in the other community expansion proceedings are specific to the location, cost, environmental and other considerations specifically related to each project. While there are some commonalities at a high level across the NGEP portfolio regarding the need for natural gas and government support for the projects, the physical and financial characteristics of the projects are sufficiently distinct from one another. Adopting the record from previous proceedings would unnecessarily complicate each proceeding, specifically in regard to the aspects that are in fact dissimilar between projects.

### *PP Request #2*

PP requests that the OEB solicit from Enbridge Gas and publish publicly the list of community expansion LTC applications that are expected in 2024 and 2025.

The complete list of NGEF Phase 2 projects can be found on the Government of Ontario's NGEF webpage<sup>1</sup>. The timing of the community expansion LTC applications/LTC exemption applications not yet filed can vary based on several factors and providing a list of estimated filing dates would afford little benefit in terms of proceeding efficiency or costs as suggested by PP.

### *PP Request #3*

PP requests that the OEB combine all remaining community expansion project LTC applications in 2024 into a single proceeding. PP recommends the same to be done for all community expansion applications in 2025. This request is unworkable as it ignores the realities of project planning and execution, as explained below.

Enbridge Gas has committed to the Government of Ontario to assess and file with the OEB several community expansion projects and applications by the end of 2025. Enbridge Gas must plan and execute project work in a coordinated manner to ensure appropriate resources are available for project development and construction. Enbridge Gas has therefore planned to stagger the filing of its remaining community expansion applications in consideration of several factors including resource availability, community readiness, costs and completion of LTC/LTC exemption filing requirements. It would be counterproductive to postpone applications where filing requirements have been completed and wait for projects still in development for the purpose of consolidating proceedings that Enbridge Gas has staggered for the above reasons.

Additionally, key aspects of the projects and associated proceedings will be unique, including the service area, size, scope of the proposed projects and the parties likely to participate in each LTC/LTC exemption proceeding.

Environmental Defence previously made the same request in relation to four previous NGEF proceedings. For those proceedings, the OEB found that combining NGEF proceedings "did not satisfy the goal of increased efficiency" and "would not serve the public interest to do so, as each application proposes service to a unique and geographically different part of Ontario". The OEB also stated:

Hearing the proceedings together would have limited probative value and would cause further and unnecessary delays to the proceedings, given the unique timing and circumstances of each project.

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<sup>1</sup> <https://www.ontario.ca/page/natural-gas-expansion-program>

...

The OEB recognizes that Enbridge Gas desires to execute project work in a coordinated manner to ensure appropriate resources are available for project development and construction.

The OEB notes that each application is different, in terms of geographical location, size and scope of the project and specific interests related to each application and proposed service area.<sup>2</sup>

Based on the foregoing, Enbridge Gas submits that the OEB should reject PP's requests.

If you have any questions, please contact the undersigned.

Sincerely,

Eric VanRuymbeke  
Sr. Advisor – Leave to Construct Applications

c.c. Henry Ren (Enbridge Gas Counsel)

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<sup>2</sup> EB-2022-0111, OEB Decision on Intervenor Evidence, Consolidation of NGEP-related Proceedings, Technical Conference, Confidentiality and Procedural Order No. 2 (February 20, 2024), pp. 21-22 (<https://www.rds.oeb.ca/CMWebDrawer/Record/839454/File/document>).