



environmental
defence
INSPIRING CHANGE

Ontario Energy Board

P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Attn: Ms. Kirsten Walli, Board Secretary

Re: Gas Distribution Inc. regulatory application EB-2017-0319

Dear Ms. Walli,

I'm writing to express the support of Environmental Defence for the Enbridge Gas Distribution Inc. application related to the geothermal service program.

Geothermal systems are a key technology which will reduce emissions in Ontario from homes and buildings. Enbridge's geothermal energy service program would allow Enbridge to own and maintain geothermal loops, providing the option for homeowners to choose and use geothermal energy systems for their home heating and cooling requirements as an alternative to natural gas and other fossil fuels.

We believe Enbridge's model will help address the key historical barriers to geothermal adoption in Ontario: high upfront costs, the reluctance of homeowners to invest in and own expensive long life ground loop infrastructure, and a fragmented and inconsistent market which has led to technical and operational inconsistency.

Approval of this application will help even the playing field for this low carbon technology with natural gas. This is consistent with Ontario's and Canada's emission reduction targets, as well as the global trend towards low carbon energy, and it is an important step which will empower Enbridge to be part of the solution to climate change.

We support Enbridge's application and encourage other Ontario utilities to take similar steps to support low carbon technologies.

Sincerely,

Keith Brooks, Programs Director, Environmental Defence

cc: Andrew Mandyam, Director of Regulatory Affairs, Enbridge Gas Distribution