

March 1, 2021

Ontario Energy Board
Attn: Christine E. Long, Registrar
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Re: **EB-2020-0091 Enbridge Natural Gas IRP Application
Inclusion of Geothermal (GeoExchange) Systems**

Dear Ms. Long:

Please accept this as a letter of comment on the above application. We formally object to the current proposal by Enbridge Gas Inc. to deliver geothermal (GeoExchange) systems within their regulated business model. This approach is both unnecessary and inappropriate because the capacity to deliver these systems exists in many forms within the private sector, for buildings of all sizes, types and locations.

Diverso Energy is one of several companies currently active in Ontario offering geothermal technology through an “energy as a service” business model, where we design, build, own and operate geothermal systems. This business model offers a financially and practically viable solution for any building to access the technology, while removing the upfront capital cost, as well as absorbing the construction and operational risks. We leverage local resources and our thorough knowledge of the technology to implement solutions that meets the highest standards at a competitive cost to the client.

With multiple private entities offering such a service (e.g., Enwave, Creative Energy, Subterra Renewables, Oakville Energy), there is no need for the involvement of any utility through the regulated business, which is intended for systems that cannot be delivered practically, reliably or at a sufficient scale to adequately address the market demand. Allowing such involvement would provide an unfair advantage in the market and, in our opinion, would be in violation of anti-competition laws. Such an advantage would produce a single player market that stifles innovation and advancement in the technology, while offering no advantage to the accessibility or growth of the technology and its adoption.

Although geothermal technology is relatively mature and proven, the adoption of the technology – both through direct purchase as well as with the energy as a service model – is currently experiencing exponential growth. New entities continue to enter the market, introducing competition from large firms that will continue to stimulate growth.

The industry in its current state is more than adequate to satisfy the growing demand for geothermal systems as a result of the transition to a low carbon economy through the electrification of buildings. The board should not allow this technology to be rate-based as it would negatively impact the growth of the industry with no tangible benefit for any stakeholder including Building Owners.

Regards,



Tim Weber
CEO