

March 4, 2021

Ms. Christine Long  
Registrar and Board Secretary  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

**RE : EB-2020-0091 Enbridge Gas Integrated Resource Planning Proposal**  
**Ontario Geothermal Association Letter of Comment**

Dear Ms. Long :

The Ontario Geothermal Association (OGA) represents manufacturers of Ground Source Heat Pumps (GSHPs), organizations engaged in geothermal Energy-as-a-Service, mechanical contractors, design firms, drilling contractors, consulting firms, and suppliers of associated components and systems. We submit this letter of comment herein.

The OGA is pleased to see the OEB conduct a proceeding to address the Enbridge Gas IRP proposal. We are hopeful this process leads to a practical IRP framework that will be consistent with the public interest and accommodate Canada's plan to move towards a low-carbon future.

The OGA supports comments from SEC and LPMA, in that we also believe fuel switching is a vital part of IRP. We further endorse SEC comments that third parties are often the best providers of IRPAs. There is overwhelming evidence of this within the Ontario geothermal industry, where a vibrant, competitive market for such systems exists. The OGA does not feel there is a need for Enbridge to pursue ownership of geothermal assets if procured through the natural gas rate base. Attempting to do so would place Enbridge in a monopoly position in an already well-functioning competitive market.

GSHPs can meet the heating, cooling, and domestic hot water needs of Canadian buildings by exchanging thermal energy to and from geothermal ground loops located on-site, while producing zero emissions at the point of use. As we move forward into a low-carbon future, GSHPs can lower the cost of electrification and help Canada meet its emissions reduction targets. The OGA and its membership continue to implement GSHP technology in Ontario buildings every day. We commend the OEB for engaging stakeholders to guide Enbridge in the development of an effective IRP framework.

Respectfully Submitted,



Jeff Hunter  
Vice-President  
Ontario Geothermal Association