

October 5, 2022

Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Nancy Marconi

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. Ontario Energy Board File: EB-2022-0157
Panhandle Regional Expansion Project
Environmental Defence Proposed Expert Evidence**

This letter is in response to the October 4, 2022 letter from Environmental Defence in regard to the OEB's request for clarification of the evidence of Dr. McDiarmid proposed by Environmental Defence.

Environmental Defence states in its letter that:

“... Environmental Defence expects that Dr. McDiarmid will only be providing factual evidence with respect to greenhouse heat pumps, not evidence that would properly be characterized as expert opinion. This evidence will be based on third party information, which will be clearly identified. We therefore do not anticipate needing to qualify Dr. McDiarmid as an expert specifically in relation to heat pumps for greenhouses. ...”

We have described Dr. McDiarmid's potential evidence relating to greenhouses as “high-level comments on electric ground source heat pumps as an alternative option for new construction greenhouses.” For instance, Dr. McDiarmid may point to the commercially available electric geothermal systems for heating and cooling greenhouses....”

Enbridge Gas submits that the proposed evidence of Dr. McDiarmid regarding the use of electric ground source heat pumps for new construction of greenhouses should be excluded. It would appear that Dr. McDiarmid's testimony in this regard would be purely a vehicle for the provision of third-party information and be a recitation by Dr. McDiarmid of facts in regard to which Dr. McDiarmid may not have the ability to fully respond to questions as to their factual accuracy or implications. The OEB would be provided with no means of verification to enable it to draw a proper inference or to rely upon the third party statements for purposes of its decision. In the absence of an opinion of an appropriately qualified expert, it would appear that the only fact that Dr. McDiarmid can speak to is that the third-party statements were made and not the basis of their content.

Yours truly,

A handwritten signature in black ink, appearing to be 'CK' with a flourish at the end.

Charles Keizer

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