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Ms. Nancy Marconi
Registrar
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Toronto, ON M4P 1E4

November 18, 2022

**EB-2022-0157 – Panhandle Regional Expansion Project Leave to Construct
Pollution Probe Interrogatories on Environmental Defence Evidence**

Dear Ms. Marconi:

In accordance with OEB direction, please find attached Pollution Probe's Interrogatories related to the Evidence filed by Environmental Defence.

Respectfully submitted on behalf of Pollution Probe.

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ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Panhandle Regional Expansion Project
Leave to Construct**

**POLLUTION PROBE INTERROGATORIES
ON
ENVIRONMENTAL DEFENCE EVIDENCE**

November 18, 2022

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

3-PP-ED-1

Table 3 in your evidence appears only to include heating costs. Please duplicate Table 3 and include incremental costs and savings if the residential customer also was able to avoid installation of an air-conditioning unit by leveraging the heat pump.

3-PP-ED-2

Please explain how your residential electric ASHP assumptions would differ for a residential home that currently has natural gas forced air heating that is at end of life and the customer switched to an electric heat pump instead of purchasing another gas furnace.

3-PP-ED-3

Efficiency Canada recently released the 2022 Canadian Energy Efficiency Scorecard ([Scorecard 2022 - Canadian Provincial Energy Efficiency Scorecard \(efficiencycanada.org\)](https://www.energycanada.org/Scorecard2022)) indicated that “to meet our net zero emission goals, space and hot water heating systems must all become at least 100% efficient” [Page 19].

- a) Is the solution you propose at least 100% efficient?
- b) Is the solution proposed by Enbridge at least 100% efficient?

3-PP-ED-4

The OEB DSM Framework applies a 15% Non-Energy Benefit (NEB) adder to the Total Resource Cost Test for energy saving technologies such as heat pumps.

- a) Was an OEB adder (i.e. 15%) used in your calculations?
- b) If not, please indicate what the impact would be for your modeling if the 15% adder is applied.
- c) Energy efficiency and/or climate programs available to Ontario consumers in the Panhandle region provide incentives for electric heat pumps. Were ASHP incentives included in the calculations and if not what would be the impact if they were included?

3-PP-ED-5

Based on the Enbridge Reply Evidence are there any changes or updates required to your model to reflect best available information? If so, please provide the changes or updates. If not, please explain why not.

3-PP-ED-6

Enbridge suggests that “Dr. McDiarmid has misused the OEB’s E.B.O. 134 economic test and relies on inappropriate simplifying assumptions, which results in a flawed outcome that cannot be relied upon to properly assess the economic feasibility of the Project.” [Reply Evidence paragraph 7].

Please indicate if this assertion is correct and what adjustments (if any) are required to the evidence provided by Dr. McDiarmid.