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**Enbridge Gas Inc.**  
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## **VIA EMAIL and RESS**

May 16, 2023

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)  
Ontario Energy Board (“OEB”) File Nos.  
EB-2022-0156 – Selwyn Pipeline Project (“SPP”)  
EB-2022-0248 – Mohawks of the Bay of Quinte First Nation Pipeline Project  
(“MBQFNPP”)  
EB-2022-0249 – Hidden Valley Pipeline Project (“HVPP”)  
Response to Pollution Probe (“PP”) Letter**

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Enbridge Gas is in receipt of PP’s May 9, 2023 letter related to the above noted applications (the “Applications”). PP commented on the upcoming procedural timelines/processes for the Applications and requested clarification from Enbridge Gas regarding an update to an interrogatory response that the Company indicated it would file by May 31, 2023. PP also commented on the OEB’s ruling in its April 17, 2023 Decision on Intervenor Evidence and Confidentiality and argued that IRP and non-natural gas project alternatives should be included in the assessment of the Applications regardless of the funding and support provided by the Government of Ontario via the Natural Gas Expansion Program.

Enbridge Gas agrees with PP’s suggestion that any supplementary interrogatory process occurs only after Enbridge Gas files its updated response to EB-2022-0249 Exhibit I.ED.16, part e). Consistent with the Company’s May 1, 2023 letter, only after the conclusion of the current interrogatory process (including the update to the above noted interrogatory response) would the OEB be able to determine whether additional discovery is required.

Enbridge Gas will not be responding to supplementary interrogatories submitted by parties until the OEB, after due consideration of the Company’s initial interrogatory responses, determines whether additional discovery is required. If the OEB determines that additional discovery is required, the OEB should consider the scope of that discovery in addition to the procedural process. To ensure that any additional discovery process is effective and efficient, Enbridge Gas submits that any additional discovery process should be limited to a single round of interrogatories and responses.

Furthermore, the scope of the interrogatories should be limited to the purpose of the additional discovery (i.e., the cost-effectiveness of high-efficiency electric cold climate air-source heat pumps, if relevant).

Additionally, given the similarities in the Applications, Enbridge Gas suggests that the Company's reply submissions be combined into a single submission which addresses all three Applications. This approach would enable an effective and efficient review of Enbridge Gas's submissions by the OEB and parties. The Company would address content that is both common and unique with respect to the Applications within the submission.

As described in Enbridge Gas's response to EB-2022-0249 Exhibit I.ED.16, part e), the Company will file an updated response to the interrogatory no later than May 31, 2023. The updated response will include a final report commissioned by Enbridge Gas which examines the performance and operational costs of all-electric and hybrid heat pump systems for a typical Ontario home. At this time, Enbridge Gas does not have an updated timeline estimate of when it expects to file the updated response but will make best efforts to do so as soon as possible and no later than May 31, 2023.

Within its letter, PP also requested confirmation from Enbridge Gas as to whether the update to the above noted interrogatory response would impact the Company's other interrogatory responses. The Company confirms that any other interrogatory responses impacted by the update would also be updated and submitted no later than May 31, 2023.

Regarding PP's suggestion that IRP and non-natural gas project alternatives should be included in the assessment of the Applications regardless of the funding and support provided by the Government of Ontario via the Natural Gas Expansion Program, Enbridge Gas believes this is argument more appropriately provided in final submissions.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis  
Technical Manager, Leave to Construct Applications

c.c. Charles Keizer (Torys)  
Henry Ren (Enbridge Gas Counsel)  
Guri Pannu (Enbridge Gas Counsel)  
Catherine Nguyen (OEB Staff)  
Zora Crnojacki (OEB Staff)  
Petar Prazic (OEB Staff)  
Intervenors (EB-2022-0156/EB-2022-0248/EB-2022-0249)