



July 21, 2023

Ms. Nancy Marconi
Registrar
Ontario Energy Board (OEB)
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4
Email: Registrar@oeb.ca

Dear Ms. Marconi,

RE: OEB Case Number EB-2022-0200

We would like to express our interest in these proceedings and add our comments for the consideration of the Ontario Energy Board.

As background, the City of Ottawa is Canada's fourth largest municipality with a population of 1,000,000, and consumes roughly 46,000TJ of natural (predominantly fossil) gas annually. Ottawa City Council declared a climate emergency on April 26, 2019. On October 28, 2020, Energy Evolution, the City's community energy transition plan, was passed unanimously by Ottawa City Council.

Energy Evolution's 100% greenhouse gas (GHG) reduction targets accounts for factors such as population growth and local climate changes induced by global heating, year by year, from now until 2050. In terms of prescribed actions, the model integrates natural gas conservation with 34 other actions to achieve an energy and emissions plan optimized in terms of cost and feasibility.

The City of Ottawa therefore has a direct interest in current discussion of natural gas Integrated Resource Planning (IRP), including the Enbridge Gas Rebasing hearing currently underway. The City of Ottawa highlights the need for proactive and effective (IRP) to result in long-term consumer cost savings, through mechanisms such as capital avoidance, which will be critical during this period of energy transition. The City of Ottawa highlights the ability of IRP to avoid potentially costly stranded assets and to align investment with the net zero goals of the City of Ottawa including its enterprises and citizens.

Since the Ontario Energy Board (OEB) St. Laurent project Decision, the City has participated in several meetings with Enbridge, and continues to seek collaboration in identifying IRP alternatives for Ottawa in alignment with the City's Energy Evolution plan. The City is awaiting clarifications on proposed plans to advance IRP in Ottawa.

Conversations to date have focused on the St. Laurent pipeline, and we have encouraged a broader IRP assessment for applicable projects Enbridge intends to pursue. The requirement for Enbridge to work on gas IRP with the City of Ottawa was outlined in the OEB's Decision and Order of the St Laurent pipeline leave to construct (File: EB-2020-0293). The City of Ottawa remains very interested in working with Enbridge and the OEB to proactively implement IRP solutions, as well as significantly increasing the amount of DSM available to our homes and businesses.

The City of Ottawa recently became aware of Enbridge IRP Workshops held for the Ottawa area but unfortunately did not receive notice to allow participation in the workshop. We encourage the OEB and Enbridge to enhance the communication plan for IRP so that all relevant stakeholders are informed and can participate in consultation activities. Further, the City of Ottawa has reviewed the documents published on the OEB website on May 30, 2023, regarding [Natural Gas Integrated Resource Planning](#). The City of Ottawa submits that there is significant opportunity to integrate IRP with City of Ottawa programs, for example the City of Ottawa's [Better Homes Loan Program](#). Currently, there appears to be no visible communication to consumers on IRP options, which limits the ability to identify alternatives and take action.

In summation, the City of Ottawa recommends the OEB undertake the following:

1. Prioritize consideration of alternatives that align with net zero objectives in lieu of additional natural gas infrastructure that has a high potential to become stranded.
2. Directly and through the OEB IRP Technical Working Group continue to keep track of the status of IRP in the St. Laurent area of Ottawa and publicly provide what IRP analysis is being conducted. Currently, the City does not have awareness of the analysis or the decision making process.
3. Consider the priority of gas IRP to work collaboratively with municipal climate plans and others in a proactive and urgent manner (i.e. within the 2024-2028 timeframe). This includes delivery of IRP initiatives in partnership with established municipal programs.
4. Consider opportunities to remove barriers that may be impeding the energy transition generally and gas IRP in particular. For example, the City of Ottawa is familiar with a proposed gas system expansion at [5371 Boundary Road in Ottawa](#). City of Ottawa climate change and resiliency staff became aware of this prospective project in February 2023 and enquired as to whether Enbridge's geothermal division could meet the required load. Enbridge stated that this would not be possible as they are prohibited by OEB decision EB-2020-0091 from referring projects from the regulated business to geothermal or related partners that include affiliates.
5. Include electric air-source heat pumps as an IRP option in alignment with what the OEB promotes for Demand Side Management. Program alignment is important to avoid consumer confusion and ensure the greatest results.
6. Require gas distribution utilities to engage in more effective outreach with municipalities (i.e. energy and emission planners) on gas IRP, demand side management and activities related to the energy transition.

Progressing this work is in the direct interest of Ontario energy consumers and aligned with the Energy Transition. The City of Ottawa is at the OEB's disposal to discuss these matters further and is interested to remove barriers that can impede progress. We are also willing to bring our partners to the table as required to achieve the outcomes Ontarians needs for the future.

A handwritten signature in blue ink, appearing to read 'Don Herweyer', with a long horizontal stroke extending to the right.

Don Herweyer
Interim General Manager
Planning, Real Estate and Economic Development
City of Ottawa

Cc: Andrea Flowers, Manager, Strategic Projects