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Enbridge Gas Inc.
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VIA EMAIL and RESS

August 8, 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 No. EB-2022-0111
Bobcaygeon Community Expansion Project ("Project")
Response to Requests for Intervenor Status**

Enbridge Gas is in receipt of requests for intervenor status from Environmental Defence ("ED") (dated July 7, 2023 and July 24, 2023), the Federation of Rental-housing Providers of Ontario ("FRPO") (dated July 31, 2023), and Pollution Probe ("PP") (dated July 5, 2023) in the above noted proceeding. Enbridge Gas has no objections to the requests for intervenor status. However, Enbridge Gas does have comments related to the content of the correspondence of both FRPO and ED.

FRPO's Request for Additional Information

Within FRPO's July 31, 2023 request for intervenor status as well as its July 3, 2023 correspondence within the above noted proceeding, FRPO states that Enbridge Gas's application and pre-filed evidence omits information required by the OEB's Natural Gas Facilities Handbook, specifically in relation to filing requirements for Exhibit B (Project Need) and Exhibit C (Alternatives). FRPO claims that the omissions include "network analysis and examination of alternatives which would provide understanding of the design criteria, initial and ultimate capacity and assessment of alternative pipe sizing."

FRPO requests that the Company provide additional network analysis information in advance of the interrogatory phase of the above-mentioned proceeding. FRPO does not provide specific-enough information to describe the requested network analysis to substantiate the assertion that its omission is not compliant with the OEB's Natural Gas Facilities Handbook. Furthermore, FRPO's submissions ignore the OEB's May 17, 2022 completeness letter. As a result, FRPO's claim that Enbridge Gas has not complied with the OEB's Natural Gas Facilities Handbook filing requirements is unsupported. In any event, to the extent they are relevant, FRPO can pose interrogatories with respect to network analysis. As a result, the processing of this application should not be delayed based on the submissions set out in FRPO's correspondence.

ED and FRPO's Requests for Technical Conference

Within ED's July 7, 2023 requests for intervenor status ED requests that a technical conference be scheduled or that parties be given the opportunity to comment on the need for a technical conference following the receipt of interrogatory responses. Within ED's July 24, 2023 intervention form ED states that a written hearing is likely sufficient however ED may request that a technical conference be held following the receipt of interrogatory responses.

Within FRPO's July 31, 2023 request for intervenor status FRPO recommends that the OEB make provision for a technical conference.

Neither ED nor FRPO's submissions provide meaningful information to support the need for a technical conference within the above-mentioned proceeding. It is Enbridge Gas's view that a written hearing is sufficient and that the OEB should reserve any determination regarding a technical conference until after the submission of interrogatory responses.

ED's Request to Submit Intervenor Evidence

Within ED's July 7, 2023 request for intervenor status ED also states its desire to file intervenor evidence. Within ED's July 24, 2023 intervention form ED states that its proposed evidence is consistent with its intervenor evidence proposal dated June 21, 2022.

ED's June 21, 2022 intervenor evidence proposal appears to be consistent with ED's March 9, 2023 evidence proposal submitted within proceedings for three similar community expansion projects. These projects were also selected to be eligible to receive funding assistance as part of the Government of Ontario's Natural Gas Expansion Program ("NGEP"):

- Selwyn Community Expansion Project, EB-2022-0156
- Mohawks of the Bay of Quinte Community Expansion Project, EB-2022-0248
- Hidden Valley Community Expansion Project, EB-2022-0249

ED's evidence proposal relates to the cost-effectiveness of alternatives to natural gas, specifically high-efficiency electric cold climate air source heat pumps.

On April 7, 2023 the OEB denied ED's evidence proposal within the three similar NGEP-funded community expansion proceedings. The OEB stated that the projects are the subject of the NGEP which was created through the *Access to Natural Gas Act, 2018*, to provide funding for projects to connect previously unserved communities to natural gas service that would otherwise be uneconomic. Importantly, the OEB also questioned whether ED's proposed evidence which consisted of cost-effectiveness analysis would be sufficient to assess choice between electric heat pumps and natural gas furnaces, where matters such as potential consumer uptake of energy solutions require the canvassing and support of the community.

As such, ED's evidence proposal should be denied by the OEB in this proceeding on the same basis as the three similar proceedings noted above.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis
Technical Manager, Leave to Construct Applications

c.c. Charles Keizer (Torys)
Tania Persad (Enbridge Gas Counsel)
Judith Fernandes (OEB Staff)