

September 21, 2023

**BY EMAIL AND FILED VIA RESS**

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)  
EB-2022-0335 – IRP Pilot Projects  
Submissions on draft issues list**

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We represent Enbridge Gas.

On September 14, 2023, Ontario Energy Board Staff (OEB staff) filed a submission and draft issues list for the recently filed IRP Pilot Projects. In accordance with Procedural Order No. 1, these are the written submissions from Enbridge Gas.

Enbridge Gas has no overall comments or concerns with the draft issues list. The Company believes that the draft issues list will permit relevant matters to be addressed and answered in the proceeding.

Enbridge Gas has three specific suggestions, each of which relate to Issue 3.0 (Proposed Project).

1. Issue 3.1 should be changed as follows:

**3.1:** For each Pilot Project, has Enbridge Gas appropriately described the identified system need ~~in the Asset Management Plan~~, and the baseline facility alternative?

The timing of the Company's Asset Management Plan (AMP) and IRP Applications will not always align, such that the description of a system need set out in the AMP may not be as current as the description of the system need that is set out in the IPR Plan Application. Enbridge Gas suggests that it is not necessary to include the crossed-out phrase in the issue description.

2. Issue 3.2 should be changed as follows:

**3.2:** Has Enbridge Gas appropriately described how each Pilot Project meets the applicable IRP Framework Guiding Principles?

It will not always be the case that all of the IRP Framework Guiding Principles apply to each IRP Plan Application. That is the case in the current application, where the pilot project nature of the proposals means that some of the Guiding Principles (such as Cost Effectiveness) only loosely apply. Therefore, Enbridge Gas proposes the addition of the word “applicable”.

3. An additional issue should be added as follows:

**3.3(a):** Taking into consideration the OEB’s IRP Framework that says that electricity IRPAs will not be included in the first generation IRP projects, is it appropriate to include a limited offering of electrification measures as an IRPA for the Parry Sound pilot project?

As permitted by Procedural Order No. 1, Enbridge Gas reserves the right to provide reply submissions in response to additional or amended issues proposed by other parties.

Please let us know if you have questions about this letter.

Yours truly,

AIRD & BERLIS LLP



David Stevens  
DS/

c: All parties registered in EB-2022-0335