

Ms. Nancy Marconi
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

September 26, 2023

**EB-2022-0335 Enbridge IRP Pilots
Pollution Probe Submission on Issues List**

Dear Ms. Marconi:

Pollution Probe is in receipt of Procedural Order No. 1 for the above-noted proceeding and stakeholder Submissions pertaining to the Issues List. Pollution Probe's September 20, 2023 submissions pertaining to the Issues List remains valid and has not been replicated in this Reply Submission.

In addition, Pollution Probe notes that an IRP project (pilot or non-pilot) is meant to displace a pending Capital project in the Asset Management Plan. Therefore, the Issue 3.1 reference to Enbridge's Asset Management Plan appears to remain relevant. It will be important to understand how the project in the Asset Management Plan was selected and what savings will result from the Capital projects avoided or delayed. Ideally, it would have been more clear to the OEB and Parties to include IRP alternatives (including proposed Pilot projects) in the Asset Management Plan and show what assets could be avoided or delayed as a result if the IRP alternative is deployed. That would support integration of IRP into the Asset Management Plan process. The OEB may wish to include an issue sub-item in consideration of how to best treat this based on the Pilots.

Pollution Probe understood that electric IRP alternatives are an option for the Pilot projects, particularly given that the OEB will be providing specific review and approvals related to the Pilot projects. However, (as noted by Enbridge) if there is any doubt, there would be benefit in the OEB adding an issue that indicates what electric IRP alternatives should be included in the Pilot projects.

Respectfully submitted on behalf of Pollution Probe.



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