

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

November 7, 2023

EB-2022-0335 Enbridge IRP Pilots
Pollution Probe Comments on Technical Conference and Oral Hearing

Dear Ms. Marconi:

In accordance with Procedural Order No. 2 for the above-noted proceeding, below are the comments from Pollution Probe on the need for a technical Conference and Oral Hearing.

The proposed IRP Pilot Projects have been a long awaited and important tool to test innovative IRP options beyond the status quo required for all applicable Enbridge capital projects required under the 2021 OEB IRP Decision and related IRP Framework. This is not a ‘business as usual’ proceeding and if executed prudently, the results from this proceeding will have positive impacts across Ontario for decades to come. It is important that the proper process and time is taken to ensure the best chance for success. This is acknowledged and reinforced by the OEB’s diligent process to this point and the detailed consideration that the OEB has taken to define the Issues List for this proceeding. Heading off in the wrong direction would undermine the purpose and intent of the Pilot Projects required by the OEB. Rightly so, the OEB has included issues to ensure that the right Pilots Projects are defined and that the outcomes of the Pilot Projects provide the benefits and learnings that they were intended to.

There are a significant amount of issues, questions and information gaps remaining that pertain to the issues the OEB has deemed in scope via the Issues List. It is likely that both a Technical Conference and an Oral Hearing component will be needed to work through all the issues properly. However, Pollution Probe recommends that the OEB commence with a Technical Conference first. It is recommended that the municipalities and LDCs related to the Pilot Project areas proposed by Enbridge be added to the Technical Conference (and Hearing) process. They are key stakeholders in this process and proceeding without their direct participation will leave obvious gaps and challenges. It would also delay progress if Enbridge needed a separate parallel process to work with those key stakeholders.

As part of the Technical Conference process, the OEB could also include a quasi-settlement element that would enable OEB Staff time following the regular Technical Conference to facilitate a discussion and documentation on any issues that parties believe could be submitted to the OEB as ‘settled’. Pollution Probe has avoided calling the additional stage a Settlement Conference because that comes with additional elements that would not be needed in this case (i.e. this process does not need to be confidential). The OEB could also proceed to an Oral Hearing following the Technical Conference where parties are always encouraged to bring forward opportunities to resolve issues in an expedient manner.

More immediately, Pollution Probe recommends that the OEB provide direction that enables electric-IRP alternatives to be considered within Pilot Projects. As noted previously, Pollution Probe understood that was always an option, but correspondence from Enbridge appears to demand this clarity early in the process. The OEB will have full transparency of the final proposed Pilot Projects, but providing that clarity early would remove a barrier to efficient discussion and planning progress. Secondly, it is recommended that the OEB provide direction to require joint development and delivery of the Pilot Projects with IESO. Based on IESO participation in this proceeding (including Interrogatories), it is evident that is supported by IESO. Developing and delivering IRP Pilots in a silo is counter-productive and a holistic community energy perspective is required for success. IRP Pilots cannot be successful without Enbridge and IESO working hand-in-hand. This also ensures the highest value from evaluation and reduces duplication. Furthermore there are resources, tools and funding (including via existing programs including energy efficiency and air source heat pumps) that IESO can bring to the pilots which will reduce the overall costs and increase the chance of success. IESO is working on the exact same issues (e.g. cold climate air source heat pumps) and it would be inefficient and imprudent to move forward in a silo.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Cc: Enbridge Regulatory (via EGIRegulatoryproceedings@enbridge.com)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)