

November 10, 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
Reply Submissions re next procedural steps**

We represent Enbridge Gas.

We write to provide comments on three items. First, in response to letters from FRPO and Pollution Probe, we set out the reasons why no technical conference is required in this case. Second, we respond to additional recommendations made by Pollution Probe in its recent letter related to the technical conference request. Finally, we set out a very recent communication received from NRCan about funding for the Home Efficiency Rebate Plus (HER+) program being discontinued in 2024, and the steps that Enbridge Gas proposes to take to update its evidence in response.

1. No Need for a Technical Conference

In Procedural Orders No. 1 and 2, the OEB indicated that after Enbridge Gas filed its interrogatory responses, parties could file comments on the need for a technical conference and/or oral hearing and then Enbridge Gas could file a response.

Interrogatories were submitted by seven parties in this case: OEB staff, APPrO, CCC, ED, FRPO, PP and SEC. Enbridge Gas provided complete responses to the interrogatories, in a filing totaling more than 900 pages. The only parties to provide comments on the need for a technical conference are FRPO and Pollution Probe. Each of those parties request a technical conference. None of the other parties indicate that this is necessary or appropriate.

In support of the need for a technical conference, Pollution Probe indicates that “there are a significant amount of issues, questions and information gaps remaining that pertain to the issues the OEB has deemed in scope”. Tellingly, Pollution Probe does not point to any examples at all of what information gaps would be addressed at a technical conference. Pollution Probe gives no credit whatsoever for the Company’s detailed application and thorough and timely responses to the large number of interrogatories received (including 34 interrogatories from Pollution Probe itself with responses totaling almost 300 pages).

FRPO's rationale for the need for a technical conference is that there is a need for more technical information about the need for the baseline facilities that IRP seeks to delay and/or downsize. With respect, that is not the main focus here. The main focus is to develop, implement, monitor and understand the impacts of a number of IRPAs, to aid in the development and implementation of future IRP Plans. Having further technical information about system pressures and related items in order to evaluate the baseline facility requirements is not necessary. No other party asked questions of this type, and no other party seems to believe that more such information is needed. Enbridge Gas answered 18 interrogatories from FRPO with responses totaling almost 50 pages – if FRPO believes that these answers are incomplete (which Enbridge Gas disputes), then it can bring a motion.

In these circumstances, Enbridge Gas does not believe that a technical conference is needed. Most parties do not make this request, and almost no details have been provided by Pollution Probe and FRPO as to what exactly needs to be added to the record through a technical conference. Adding a technical conference, particularly in the context of the current busy regulatory calendar, will delay the review and approval and implementation of the IRP Pilot Projects. Enbridge Gas seeks to move ahead as quickly as reasonably possible.

2. Response to Additional Pollution Probe Recommendations

Enbridge Gas notes that Pollution Probe includes several other recommendations that go beyond the questions set out by the OEB in Procedural Order No. 1.

Pollution Probe appears to request that the OEB should compel the impacted municipalities and LDCs for the IRP Pilot Projects to become participants in the proceeding. This is not needed, nor is compelling this to happen appropriate. Enbridge Gas has consulted throughout with the municipalities and LDCs in the impacted communities. Evidence about that consultation has been provided. Enbridge Gas will continue to consult and coordinate with those entities as the Pilot Projects are implemented. There is no indication that the municipalities and LDCs have been excluded from the regulatory process, nor that they themselves actually want to participate. The municipalities and LDCs are aware of this proceeding, and were eligible to participate, but they chose not to do so. There is no basis for the OEB to compel them to be participants.

Pollution Probe makes several other proposals related to electricity-related linkages with the IRP Pilot Projects.

First, Pollution Probe asks that the OEB provide early endorsement of the Company's proposal for limited use of electric IRPAs in the Pilot Projects. It is not clear why this is needed, nor how the OEB could provide such guidance before seeking submissions from all parties. Enbridge Gas believes that this can be addressed as part of the overall determination of the application.

Second, Pollution Probe asks the OEB to require joint delivery of the IRP Pilot Projects by Enbridge Gas and IESO. This is not appropriate. These are gas IRP projects. Enbridge Gas disputes the assertion from Pollution Probe that IESO is seeking a joint delivery role. IESO is seeking, and Enbridge Gas is happy to provide, information about the response to the IRP Pilot Projects. IESO also is a member (observer) of the IRP Technical Working Group ("TWG") where the Pilot Projects are discussed, and continues to be engaged in discussions regarding the Pilot Projects in that forum. As stated in response to Exhibit I.IESO-1, Enbridge Gas is amenable to

coordinating with the IESO on the design and implementation of the Pilot Projects to ensure the lessons learned through them are supportive of coordinated planning processes. This is not the same as joint delivery. The contemplated process will see Enbridge Gas provide information about its plans with IESO and, if offered, consider IESO's comments about how best to proceed. Enbridge Gas does not agree that there is any basis for the OEB to direct Enbridge Gas to jointly develop and deliver the IRP Pilot Projects with IESO. That does not fit with the OEB's IRP Framework and, importantly, is not something that either Enbridge Gas or IESO requests.

3. Response to NRCan Announcement re discontinuation of HER+ funding

On November 8, 2023, NRCan informed Enbridge Gas that NRCan is discontinuing new entrants into the Greener Homes Grant in 2024, with a stoppage of new program intake around Q1 2024. NRCan's Greener Home Grant is a core component for the partnership Home Efficiency Rebate Plus (HER+) program delivered by Enbridge Gas. This information was then provided to the Service Organizations (entities that deliver the HER+ program) on November 9, 2023 through an NRCan presentation. There will be no new applications for HER+ projects after the close-out date, though applications received before then will be eligible to proceed to completion within three years.

This change is a very new development. Enbridge Gas is in the process of evaluating all of the implications, but does expect impacts on the budgets for the IRP Pilot Projects, since some of the funding for portions of the enhanced targeted energy efficiency (EETE) IRPAs was forecast to come from NRCan.

Enbridge Gas expects that updates will be required to the evidence and interrogatory responses in this proceeding.

As explained earlier, Enbridge Gas is focused on being able to complete this application, obtain approvals and implement the IRP Pilot Projects as soon as possible. In that spirit, Enbridge Gas plans to file all necessary evidence updates resulting from the NRCan announcement (including interrogatory response updates) by November 30th. Enbridge Gas is optimistic that no additional discovery (interrogatories or technical conference) will be required.

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