

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

November 15, 2023

**EB-2022-0335 Enbridge IRP Pilots
Pollution Probe Comments**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's correspondence dated November 10, 2023 for the above-noted proceeding. In the letter Enbridge included new information pertaining to its continued delivery of the Greener Homes Grant Program and also comments related to option to leverage the OEB's IRP Technical Working Group (TWG).

As outlined by Enbridge, the OEB approved incentives that leverage a combination of DSM¹ and the Greener Homes Grant Program are specifically relevant to this proceeding and Enbridge also indicated that some of the proposed IRP Pilot Project costs were planned to be done in coordination with the Greener Homes Grant Program. This is a logical approach given the cost-effectiveness and synergies between IRP, DSM and the Greener Homes Grant Program. Full disclosure of information and potential impacts will be important to this proceeding, including a Technical Conference and/or Oral Hearing. Pollution Probe recommends that Enbridge file a copy of all relevant Greener Homes Grant Program correspondence proactively (i.e. now) rather than waiting for a Technical Conference and/or Oral Hearing. This would help expedite the process. Although Enbridge does not need the OEB to tell them to do this, it is encouraged that the OEB acknowledge the importance of providing this transparent real time information when it issues its direction on the next steps in this proceeding.

Potential reduction of Greener Homes Grant Program funding further reinforces the points in Pollution Probe's submission dated November 7, 2023, specifically the importance of leveraging other options of funding and support, including co-delivery with IESO². As outlined by Enbridge., this option has been dismissed and Enbridge is not willing to coordinate with IESO on that basis, despite its benefits to the pilots, IRP and Ontario energy consumers in general.

Enbridge's letter acknowledges the importance of working with IESO given the obvious alignment in focus to provide innovative energy solutions to Ontario communities such as those proposed in the Pilot Projects. This also helps avoid the energy siloes in Ontario that the OEB has diligently been working to remove. Enbridge suggests that IESO's role as an Observer on the OEB IRP TWG is suitable to ensure sufficient input and alignment. This clearly not the case.

¹ DSM used in a targeted geographic manner is one IRP alternative highlighted by the OEB.

² IESO has Ontario's best in class pilot and evaluation capacity and the OEB applied many of the IESO best practices to Enbridge when determining the IRP Decision/Framework, including implementation of more transparent stakeholder outreach (e.g. IRP website)

The OEB is already aware of unanimous stakeholder concern on Enbridge execution with the OEB's IRP Decision and related IRP Framework³ and it is no secret that stakeholders, including the permanent⁴ members OEB's IRP TWG do not believe that Enbridge is consulting with the OEB IRP TWG in an appropriate or meaningful manner⁵. Members of the OEB IRP TWG have confirmed that they were not included in the development of the proposed pilots in any meaningful manner. It is clear that Enbridge's proposal to relegate IESO to an Observer on the OEB IRP TWG which appears to not be working properly is not a substitute for real time development and delivery of consumer-centric innovative IRP pilot opportunities.

Pollution Probe reiterates the validity of the approach recommended in its November 7, 2023 submission and requests that the OEB proceed on that basis.

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)

³ EB-2022-0200 K7.2 PollutionProbe_HearingCompendiumPart2_20230720, Page 6. Final Transcript EB-2022-0200 Enbridge Gas Rebasng Vol 6, Page 102 lines 8-18.

⁴ Permanent members are the core OEB IRP TWG and some Observers such as IESO are also able to sit in.

⁵ EB-2022-0200 K3.4 PollutionProbe_HearingCompendium_20230714, Pages 150-158, Pages 120-128.