

# Elson Advocacy

December 14, 2023

**BY RESS**

**Nancy Marconi**

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: EB-2022-0111 – Enbridge Gas – Bobcaygeon Gas Expansion Project  
EB-2022-0246 – EPCOR – Brockton Gas Expansion Project  
EB-2023-0200 – Enbridge Gas – Sandford Gas Expansion Project  
EB-2023-0201 – Enbridge Gas – Eganville Gas Expansion Project  
EB-2023-0261 – Enbridge Gas – Neustadt Gas Expansion Project**

I am writing on behalf of Environmental Defence regarding the above gas expansion cases to propose that they be heard together for the sake of efficiency and to provide details on evidence that Environmental Defence will be seeking to submit in those cases.

## **Consolidation**

Environmental Defence suggests that it may be more efficient and a better use of the OEB's resources to hear these proceedings together, or to at least hear all of the Enbridge gas expansion cases together. Most importantly, it would be beneficial to have a single technical conference for all proceedings. There is a great deal of overlap in the issues, evidence, and witnesses. A single technical conference would be much more efficient.

It would also be beneficial to receive a procedural order stating that evidence in any one of these gas proceedings may be referred to in another proceeding. That would allow Enbridge to avoid answering the some of same interrogatories and technical conference questions over and over again.

This is simply a suggestion for consideration by the OEB. Environmental Defence is content to proceed with separate cases if that is the OEB's preference.

## Survey Evidence

Environmental Defence wishes to retain a public opinion research firm to conduct community surveys to gauge the likely number of connections and to test the survey and customer connection forecast evidence submitted by Enbridge. Environmental Defence's survey would be similar to Enbridge's survey but would correct a number of methodological errors. For instance, it would expand on the information provided to respondents to also include the average annual heating costs of gas versus heat pumps prior to asking customers to gauge their likelihood of switching to gas. To avoid any suggestion that those figures are biased, we would use the estimates from the recent gas expansion discussion paper published by the Ministry of Energy (showing that electric heat pumps would save customers in the range of \$700 to \$1,300 each year in gas expansion communities on average, not including savings from cooling).<sup>1</sup>

By providing the survey respondents with accurate and unbiased information, we believe the survey would produce much more robust results on which to estimate the number of customers that are likely to connect to the gas system. In the very least, it would provide the OEB with a different perspective from Enbridge's. This evidence would also address the main criticisms that Enbridge has made to the evidence that Environmental Defence has proposed to submit previously as well as its criticisms of the survey conducted by Elizabeth Carswell in Sandford.

Environmental Defence would prefer to conduct the surveys in each community as this would provide better information and achieve economies of scale. However, if the OEB is concerned about the effort and cost to do so, an alternative approach could involve conducting the survey in just one community in order to compare the results with the outcomes of Enbridge's survey. This could allow the results to be extrapolated to other communities, subject to appropriate caveats.

We understand that the OEB will be providing further guidance regarding potential intervenor evidence. We propose to provide further details regarding timing and cost at that time. In the meantime, we have received a very rough quote of \$15,000 to conduct this survey in the Bobcaygeon area. We are providing this information proactively in the event that the OEB has any further guidance or requests for information relating to this proposed evidence when it issues its next procedural order in each proceeding.

Yours truly,



Kent Elson

cc: Parties in the above proceeding

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<sup>1</sup> Ministry of Energy, *Future of Natural Gas Expansion and Home Heating Affordability - Discussion Paper for Consultation*, August 2023, p. 10-11 ([link](#)).