



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

BY EMAIL

December 28, 2023

Kent Elson  
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Dear Kent Elson:

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

On December 14, 2023, Environmental Defence filed a letter with the Ontario Energy Board (OEB) proposing:

- That the OEB consolidate the hearing of the above noted natural gas expansion projects, or at least the Enbridge Gas Inc. (Enbridge Gas) expansion projects, given the significant overlap in the issues and evidence for these projects and proposing a joint technical conference for these projects
- To file new survey evidence with respect to the Enbridge Gas natural gas expansion projects.

On December 21, 2023, Enbridge Gas filed a letter responding to Environmental Defence's letter with respect to its projects.

Enbridge Gas stated that the OEB should deny Environmental Defence's request to consolidate the proceedings and to hold a joint technical conference as this would result

in limited probative value and unnecessary delays to the proceedings, given the unique timing and circumstances of each project.

With respect to Environmental Defence's request to file new survey evidence, Enbridge Gas stated that the OEB should deny this request. Enbridge Gas argued that the proposed evidence is not likely to provide more accurate information regarding consumer and community interest in natural gas system expansion than that of the Government of Ontario's and Enbridge Gas's information and would result in unnecessary delays to the proceedings. Enbridge Gas also argued that Environmental Defence has been provided with ample time and opportunity to request to file evidence within the proceedings and the lateness of this new request to file evidence is unjustified.

On December 22, 2023, EPCOR Natural Gas Limited Partnership filed a letter requesting to withdraw its leave to construct application for the Brockton expansion project.

The OEB notes that three of the above noted expansion projects (Enbridge Gas-Bobcaygeon, EPCOR-Brockton, and Enbridge Gas-Sandford) are currently in abeyance while the preliminary procedural steps set by the OEB for two expansion projects (Enbridge Gas-Eganville Gas and Enbridge Gas-Neustadt) are expected to be completed by late January 2024.

Before considering the proposal for a consolidated hearing or next procedural steps for these projects, the OEB requires Environmental Defence to provide responses to the following questions regarding the evidence that it is seeking to provide.

As a preamble to a number of these questions, the OEB observes that Environmental Defence filed its request for intervenor status in the Enbridge Gas -Bobcaygeon case on June 17, 2022 and filed a letter on June 21, 2022 providing a description of the evidence it wishes to provide relating to cost-effectiveness of heat pumps and the risk that Enbridge's forecast revenue forecast will not materialize due to customers choosing to adopt alternatives to natural gas over time. That case was placed in abeyance on July 6, 2022 at Enbridge's request, to allow Enbridge update its customer survey evidence. After the application was updated on June 14, 2023, the OEB issued another notice of the application. Environmental Defence again requested intervenor status and confirmed that it was still seeking to file evidence as described in its letter of June 21, 2022. Environmental Defence made similar requests in the other Enbridge Gas proceedings mentioned above. Environmental Defence's requests in the Sandford and Eganville cases included a similar description of its proposed evidence, while its request in the Neustadt case was less specific (stating only that it wished to file evidence in the

proceeding and that it could provide a letter outlining that evidence and the expected cost in short order), but in no case did Environmental Defence indicate an intention to file survey-related evidence. That was new to Environmental Defence's letter of December 14, 2023. However, the December 14, 2023 letter is silent regarding Environmental Defence's previously expressed intention to file heat pump-related evidence.

- Does Environmental Defence seek to file heat pump evidence as well as survey evidence for each of the above noted natural gas expansion projects, or is Environmental Defence withdrawing its original requests to file evidence relating to cost-effectiveness of heat pumps and the risk that Enbridge's forecast revenue forecast will not materialize due to customers choosing to adopt alternatives to natural gas over time?
- Please provide further details regarding the timing and costs for the evidence (heat pump, survey, or both) that it wishes to submit for each of the above noted Enbridge Gas natural gas expansion projects.
- Does Environmental Defence plan to advocate for a heat pump study and/or survey evidence in all future Natural Gas Expansion Program Leave to Construct applications?
- Why did Environmental Defence not request leave to file survey evidence earlier in these proceedings? What information does Environmental Defence suggest is deficient in the Enbridge Gas survey that necessitates a new and separate survey by Environmental Defence?
- What specific information might Enbridge Gas provide to future survey respondents that would satisfy Environmental Defence's concern regarding the economics of heat pumps versus natural gas?
- What information would Environmental Defence seek to provide to the community in a survey that is related to the future costs of electricity and natural gas?
- What information would Environmental Defence include in the survey related to the potential need and costs for household renovations to accommodate a heat pump into an existing home?
- Does Environmental Defence expect the current levels of heat pump subsidies to continue for the duration of these projects' pay-back periods?

- Does Environmental Defence anticipate any political or public policy risk associated with the federal charge on carbon continuing as planned until 2030?

The OEB expects to receive responses to these questions from Environmental Defence by January 11, 2024.

Please direct any questions relating to this letter to Case Manager, Judith Fernandes, at 416-440-7638 or [Judith.Fernandes@oeb.ca](mailto:Judith.Fernandes@oeb.ca).

Yours truly,

Nancy Marconi  
Registrar

- c: The applicant and all parties in the following proceedings:  
EB-2022-0111 – Enbridge Gas – Bobcaygeon  
EB-2022-0246 – EPCOR – Brockton  
EB-2023-0200 – Enbridge Gas – Sandford  
EB-2023-0201 – Enbridge Gas – Eganville  
EB-2023-0261 – Enbridge Gas – Neustadt