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Enbridge Gas Inc.
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January 17, 2024

VIA EMAIL and RESS

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

Re: Enbridge Gas Inc. (Enbridge Gas or the Company)
Ontario Energy Board (OEB) File No.: EB-2023-0261
Neustadt Community Expansion Project (Project)
Reply Submission Regarding Need for Technical Conference

Pursuant to the OEB's Procedural Order No. 1 dated November 17, 2023, this is Enbridge Gas's response to the correspondence of Environmental Defence (ED) and Pollution Probe (PP) wherein the intervenors requested a technical conference and oral hearing.[1] ED also requested that a single technical conference be held for all ongoing Enbridge Gas community expansion proceedings and PP requested that the OEB allow ED to commission and file the evidence it has proposed.[2]

Enbridge Gas is also in receipt of OEB staff's correspondence which stated that OEB staff does not require further discovery through a technical conference regarding Enbridge Gas's evidence, however, if the OEB allows ED to file evidence some discovery would be required (potentially including a technical conference).

Enbridge Gas submits that a technical conference and/or oral hearing regarding the Company's evidence for the above-noted proceeding is not required since the record is complete and no party raised any substantive issues that require further inquiry or clarification. Additionally:

- Regarding ED's request that a single technical conference be held for all ongoing Enbridge Gas community expansion proceedings, the Company reiterates its position within its December 21, 2023 letter[3] that the OEB should deny ED's request as a joint technical conference would result in limited probative value and unnecessary delays to the proceedings, given the unique timing and circumstances of each project.

[1] Request for a technical conference and/or oral hearing was made by PP only.
[2] On December 14, 2023, ED filed a letter with the OEB proposing to file new survey evidence in the Bobcaygeon Community Expansion Project (EB-2022-0111), Sandford Community Expansion Project (EB-2022-0200), Eganville Community Expansion Project (EB-2023-0201), and Neustadt Community Expansion Project (EB-2023-0261) proceedings.
[3] https://www.rds.oeb.ca/CMWebDrawer/Record/827774/File/document

- Regarding ED's request to file new evidence, Enbridge Gas reiterates its position within its December 21, 2023 letter that the OEB should deny ED's request as 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, should not be funded by natural gas ratepayers, and would result in unnecessary delays to the proceedings. Additionally, the OEB should consider the material delay that would arise from admitting ED's evidence.
- Regarding OEB staff's position that if the OEB allows ED to file evidence some discovery would be required (potentially including a technical conference), Enbridge Gas agrees that discovery would be required and reiterates its position within its December 21, 2023 letter that the Company requires the opportunity for discovery and to file responding evidence. Regarding a technical conference related to ED's evidence, Enbridge Gas submits that the OEB should make that determination upon review of ED's written interrogatory responses.

In support of its request for a technical conference for the above-noted proceeding, ED submits that it is warranted for the same reasons as in the Bobcaygeon Community Expansion Project (EB-2022-0111) and Sandford Community Expansion Project (EB-2022-0200) proceedings. Enbridge Gas provided detailed responses to ED's requests for technical conferences for those proceedings on September 26, 2023[4] and November 22, 2023[5]. As set out in those responses, Enbridge Gas submits that ED has not provided a substantive basis to require technical conferences.

In support of its request for a technical conference and/or oral hearing and ED's request to file new evidence, PP relies on mischaracterizations regarding information related to the above-noted proceeding and other proceedings, specifically:

- PP suggests that Enbridge Gas provided significant new information through the Company's interrogatory responses within the above-noted proceeding but provides no information to support the statement. PP's statement is not supported by the evidence and it is a baseless allegation.
- PP suggests that, within the OEB's Phase 1 Decision in the EB-2022-0200 proceeding, the OEB reiterated PP's concerns regarding the lack of objective information being provided to prospective customers by Enbridge Gas within its attachment surveys. PP's statement is misleading; rather, the OEB directed Enbridge Gas to "review the energy comparison information currently on its website and printed materials to determine whether it fully discloses what is being compared and on what basis, and what assumptions are being used for the comparison. Enbridge Gas shall either update the information to correct any deficiencies or remove the information."[6]
- PP suggests that "Enbridge recently indicated that it does not believe that is Enbridge's role to consider non-gas options". PP's statement is misleading; rather, Enbridge Gas stated that it should not be "directed to provide information on the annual operating cost of electric heat pumps relative to the operating cost of natural gas" and that "providing consumers with information related to

[4] https://www.rds.oeb.ca/CMWebDrawer/Record/815729/File/document
[5] https://www.rds.oeb.ca/CMWebDrawer/Record/823691/File/document
[6] EB-2022-0200, Decision and Order, p. 47.

> conversions to any non-natural gas energy solution, in particular electric heat pumps, without consideration of those energy solutions' supply-side requirements would not be appropriate or valuable. That is a role best left to the providers of those non-natural gas energy solutions."[7] Additionally, PP continues to ignore the OEB's Integrated Resource Planning Framework for Enbridge Gas (IRP Framework) wherein the OEB concluded that IRP evaluation is not required for NGEP-funded projects[8] and that it is not appropriate to provide funding to Enbridge Gas for electricity IRPAs[9].

PP provides no meaningful support for a technical conference and/or oral hearing nor ED's request to file new evidence and as such PP's submission should be given no weight.

Based on the foregoing, Enbridge Gas submits that there is no basis for a technical conference and/or oral hearing and the most regulatory efficient next step is the filing of submissions.

Please contact me if you have any questions.

Yours truly,

Evan Tomek

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Evan Tomek
Advisor, Regulatory Applications – Leave to Construct

[7] EB-2022-0156/0248/0249, Enbridge Gas Reply Submission, para. 31.
[8] EB-2020-0091, Decision and Order (Appendix A), pp. 10-11.
[9] EB-2020-0091, Decision and Order (Appendix A), p. 6.