

# Elson Advocacy

January 18, 2024

**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-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 in response to the letter from Enbridge of today's date opposing Environmental Defence's proposed survey evidence. Enbridge's objections are without merit.

Enbridge states that Environmental Defence will omit information on factors that could impact the cost-effectiveness of heat pumps, such as the possible end of carbon pricing. That is not a true or fair statement. Environmental Defence is not in a position to provide the survey script as it has not yet been approved to retain the public opinion research or heat pump experts that would work together to prepare that script and ensure it is fair and unbiased. We can confirm that they would be instructed to develop a script that is fair and unbiased.

Enbridge argues that heat pumps are no longer cost-effective without carbon pricing. They have misunderstood the evidence of Dr. McDiarmid in a different proceeding and misapplied it in this proceeding. The most obvious error in Enbridge's logic is that these four gas expansion proceedings concern customers who pay a surcharge of \$0.23/m<sup>3</sup>, which did not apply in the Panhandle Region addressed by the report relied on by Enbridge. At an average residential consumption of 2,300 m<sup>3</sup>, the surcharge alone costs \$597.77 per year, or \$8,966.55 over the lifetime of a heat pump.<sup>1</sup> Heat pumps continue to be cost effective in these gas expansion communities even without a price on carbon.

Enbridge argues that Environmental Defence's survey would not be "aimed at accurately assessing consumer interest in attaching to the natural gas system." That is exactly the opposite of what we have advised the OEB we wish to do. To be clear, Environmental Defence's survey would be squarely aimed at accurately assessing consumer interest in attaching to the natural gas system. Those would be the instructions to the experts, along with the requirement to conduct the survey and prepare the evidence in a way that is fair, objective and non-partisan.

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<sup>1</sup> Calculation:  $0.23 \times 2,300 \times 1.13 \times 15$ , which is: (surcharge rate) x (annual m<sup>3</sup>) x (HST) x (years).

Enbridge and Environmental Defence both argue that each other's surveys are or will be biased and inaccurate. However, Enbridge's critique is entirely speculative and unfair as Environmental Defence has not had an opportunity to retain the professionals necessary to prepare the script. Furthermore, these critiques are questions to be decided at the end of the proceeding based on argument and are not valid reasons to disallow an opportunity to file evidence. Although Environmental Defence believes Enbridge's survey evidence is entirely biased and inaccurate, we do not deny that it is admissible, nor are we asking that it be struck from the record.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', written in a cursive style.

Kent Elson

cc: Parties in the above proceeding