

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

March 26, 2024

**EB-2022-0335 Enbridge IRP Pilots
Pollution Probe Comments on Abeyance Request**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's correspondence dated February 29, 2024 and March 26, 2024 for the above-noted proceeding requesting that the OEB extend the IRP Pilot abeyance.

Enbridge's original abeyance request on November 10, 2023 highlighted the reason for delaying the IRP Pilots as being the need to reassess the IRP Pilots given that Enbridge intended to leverage a portion Greener Homes Grant Program funding to assist in delivering the IRP Pilots. Enbridge has OEB approved IRP variance accounts already in place, but partnering with others to share costs, enhance consumer benefits (beyond natural gas reductions) and enhance Pilot validation is a noble goal. Pollution Probe recommended that Enbridge partner and co-deliver with IESO. This suggestion was rejected by Enbridge.

Enbridge's most recent letter now indicates that the basis for ongoing abeyance of the IRP Pilots is that Enbridge continues to assess impacts of changes to the Company's 10-year capital forecast resulting from the:

- (i) annual system reinforcement plan (SRP) update,
- (ii) annual energy transition adjustments update, which are applied to the Company's 10-year demand forecast to reflect best available information in Ontario and
- (iii) reduction in approved capital in the 2024 Rebasing Phase 1 (EB-2022- 0200) Decision.

The new rationale highlighted by Enbridge is irrelevant to proceeding with IRP Pilots and Pollution Probe recommends that the OEB avoid additional delays in proceeding with the IRP Pilots. As previously noted, the OEB in EB-202-0091 issued July 22, 2021 ordered Enbridge to develop and implement two IRP Pilots prior to the end of 2022 and there have been no tangible IRP results since the IRP Decision and related Framework was put in place in 2021. Nobody would have even guessed that we would be here 3 years later without the IRP Pilots even launched.

As outlined in the OEB's 2021 Decision "The pilots are expected to be an effective approach to understand and evaluate how IRP can be implemented to avoid, delay, or reduce facility projects". These are simply pilots to advance the understanding of tools that can be applied on a more holistic scale to the broader portfolio Enbridge is referring to. Based on Enbridge's Pilot timeline¹, it could take

¹ EB-2022-0335, Exhibit D, Tab 1, Schedule 1, Table 1.

Enbridge four years to complete all elements of the Pilots. Once the pilots are complete several years from now, then the learning can be applied to the broader Enbridge portfolio.

Additionally, Enbridge has an OEB approved IRP Deferral Account which is entirely separate from the Capital and O&M approved in the 2024 Rebasing proceeding. The reasons provided by Enbridge appear to be a tactic to simply stall progress on the IRP Pilots and gas IRP in general.

Pollution Probe is unaware of any valid reason why this proceeding should remain in abeyance. Pollution Probe recommends that the OEB reject the request for the ongoing Abeyance and issue a procedural order to move this process forward in 2024. Further delay without a plan to get IRP on track is not recommended.

Respectfully submitted on behalf of Pollution Probe.



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