

Elson Advocacy

April 20, 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 regarding the above gas expansion proceedings to address an issue that requires clarification that came to light in Enbridge's reply submissions.

Footnote 13 in Environmental Defence's submissions was included in error and should be disregarded. It notes a difference in the survey approach taken in the Mohawks of the Bay of Quite First Nation gas expansion case and does not reflect the four gas expansion cases before the OEB today.

Please also note that Environmental Defence did not "ignore" the OEB's decision not to consolidate these proceedings as Enbridge has alleged. Although we provided a single set of submissions, that was done to avoid the time that would have been wasted by the OEB and other parties if we had submitted four separate submissions with almost identical content, which would have required the OEB to comb through those to discern the differences. Instead, we believed it was more efficient that the OEB be able to view the unique aspects of the applications via the simple tables in our submissions that include the relevant data for all cases.

In addition, our submissions on the customer survey apply to all four proceedings even though the survey in Eganville was somewhat different. The surveys in Bobcaygeon, Sandford, and Neustadt are almost identical to each other and to those conducted in Hidden Valley and Selwyn.¹ They contain only "minor wording changes" that are irrelevant to the issues in this proceeding, as detailed in the Enbridge interrogatory responses comparing the surveys.² The survey in Eganville was also the same except that it did not include the information on heat pumps included in other surveys (which is critiqued on page 8 of Environmental Defence's

¹ EB-2022-0111, Exhibit I.ED.10 ([link](#), p. 297); EB-2023-0200, Exhibit I.ED-8 ([link](#), p. 242); EB-2023-0261, Exhibit I.ED-8 ([link](#), p. 210).

² *Ibid.*

submissions).³ None of the surveys provided key information to survey recipients that would be necessary to adequately forecast whether customers will likely convert to gas.

This letter is intended to provide clarifications regarding Environmental Defence's submissions and is not intended as a sur-reply. But if the OEB believes leave is required to consider the above, we ask that leave be required as the additional clarity will assist the OEB.

Yours truly,



Kent Elson

cc: Parties in the above proceeding

³ EB-2023-0201, Exhibit I.ED-8 ([link](#), p. 352).