

# Elson Advocacy

February 2, 2024

**Ms. Nancy Marconi**  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. 2024 to 2028 Rates Application  
EB-2022-0200**

I am writing on behalf of Environmental Defence to submit motion materials seeking an interlocutory order prohibiting Enbridge from using ratepayer funds to promote the expansion of gas service, policies geared toward the expansion of gas service, or lessened regulatory oversight. The details and basis of the motion are described in the Notice of Motion appearing at tab 1 of the attached Motion Record.

Although we believe an interlocutory order is warranted in the circumstances and that this can be achieved by way of an interlocutory motion as described in the Notice of Motion, we understand that the OEB has considerable workload in relation to this matter as phase II starts and as Enbridge's review motion is considered. If the OEB believes that the issues raised in the Notice of Motion should not be dealt with by way of an interlocutory motion, we ask in the alternative that they be added to the issues list for phase II of this proceeding.

Yours truly,



Kent Elson

cc: Parties to the above proceeding