

Ms. Nancy Marconi  
OEB Registrar  
Ontario Energy Board  
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2300 Yonge Street  
Toronto, ON M4P 1E4

June 7, 2024

**EB-2022-0335 Enbridge IRP Pilots**  
**Pollution Probe Comments on New Enbridge IRP Pilot Proposal**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's correspondence dated June 7, 2024 proposing that Enbridge remove the Parry Sound ("PS") Pilot Project and retain the Southern Lake Huron ("SLH") Pilot Project) in its Application to be filed no later than June 28, 2024. As the OEB is aware, the OEB Decision in EB-202-0091 issued July 22, 2021, the OEB order Enbridge to develop and implement two IRP Pilots prior to the end of 2022. There has been no tangible IRP outcomes achieved since the OEB issued the IRP Decision and Related Framework in 2021. Enbridge's new proposal would result in the June 2024 filing to include 1 out of 2 (or 50%) of the pilot projects required by the OEB.

It is not a surprise that the PS Pilot Project is not required in the Company's 10-year capital forecast. Each version of the Asset Management Plan is simply a potential list of projects and many of these would be deprioritized or drop off the list due to lack of need or priority. The PS Pilot Project was not an urgent or high value IRP candidate (i.e. to avoid, delay or reduce a capital project in the near future), but given that the two Pilot Projects required by the OEB are meant to (in part) advance innovative IRP options for broader consideration, the initial project proposal appeared adequate to achieve that purpose. It would be much more valuable to select meaningful and significant capital projects that are higher priority to really demonstrate the value of Enbridge's IRP toolset (in coordination with the complimentary toolset from other partners such as IESO, municipalities, LDCs, etc.).

It is surprising that Enbridge has not put forward a long list of candidates for IRP Pilot consideration. Enbridge submitted that its recent Rebasing Capital request to the OEB<sup>1</sup> was based on 3246 capital projects listed in its Asset Management Plan (AMP)<sup>2</sup>. Even using only the 2,2781 projects that went through the IRP screening process by Enbridge<sup>3</sup>, that provides a robust set of projects for considerations. The fact that Enbridge is indicating that it only has one project where IRP is being considered is quite alarming. One obvious candidate is the St. Laurent Ottawa North Replacement Project. In EB-2020-0293, the OEB specifically indicated that "...for future leave to construct applications, the OEB encourages Enbridge Gas to undertake in-depth quantitative and qualitative analyses of alternatives that specifically include the impacts of IRP, DSM programs and de-carbonization efforts"<sup>4</sup>.

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<sup>1</sup> EB-2022-0200

<sup>2</sup> EB-2022-0200 Exhibit J12.2

<sup>3</sup> EB-2022-0200 EB-2022-0200 Final Transcript EB-2022-0200 Enbridge Gas Rebasing Vol 12, Page 46 line 7.

<sup>4</sup> EB-2020-0293 OEB Decision and Order\_20220503, Page 24.

Pollution Probe recommends that the OEB proceeds with consideration of the SLH Pilot Project immediately and require Enbridge to file the second Pilot project prior to September 1, 2024 in direct consultation with the OEB IRP WTG and relevant stakeholders (including IESO). Enbridge had previously indicated that it had already undertaken activities and related expenditures for the PS Pilot Project<sup>5</sup> that is now proposes to remove for IRP consideration. It is unclear how costs related to the PS Pilot Project would be treated and recovered if it is no longer part of the proposed Application. It would be helpful for Enbridge to summarize the work done on the PS Pilot Project to-date and how those costs are to be treated.

Respectfully submitted on behalf of Pollution Probe.



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<sup>5</sup> EB-2022-0335 EGI\_LTR\_IRP\_Pilots\_20221222\_eSigned