

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

August 1, 2024

EB-2024-0197 – Support for the Environmental Defence Motion to Review Decisions

Dear Ms. Marconi:

I have been a Sandford resident without gas for 40 years and I am the only local resident participating in this process. If gas were available, I would not use it because I am very concerned about the changes in the climate I have observed locally, especially the Tornado in 2022, the smoky skies last summer and the heat attributed to climate change this summer. I have received a copy of the Notice of Hearing EB-2024-0197. I support the Environmental Defence motion. The OEB mentions a few points that they would like to hear more on. I will address only the first two.

1. The OEB's role and responsibilities regarding procedural fairness, particularly the balance between the right to be heard and the ability of a tribunal to control its own process and to conduct an efficient proceeding.
2. As the OEB chose not to consider the review motions until after the Final Decisions were issued, how the Final Decisions might have been different if Environmental Defence had been permitted to file its proposed evidence.

My comment on #1 is about the delicate balance between an efficient process with all the necessary information available compared with the possibility of a quicker process that inadvertently missed important information or a long process that includes duplicate information.

I support the Environmental Defence motion to review decisions. The missed deadline for interrogatory answers resulted in vague technical conference requests and therefore no technical conference.

Intervenors were not provided the answers to the interrogatories on time or even with any time to review the evidence before the deadline to request a technical conference. I would have been much more specific in my technical conference request if the answers to the interrogatories had been supplied within the deadline.

A technical conference would have allowed back and forth discussion of the assumptions used in the savings calculations that were provided to my neighbours. I was able, through my own calculations, to discover an error in the calculation of savings between a propane and gas furnace. Enbridge has suggested that 5% is not material but I am confident that when expressed in dollars this difference would be very meaningful to anyone in Sandford that had paid for a furnace conversion. I have remaining questions about the other assumptions in the spreadsheet that were used without any references. I would have asked about the water heating assumptions as well, especially since the timing of a water heater replacement is not related to the timing of a furnace conversion and amount of gas used for water heating would likely depend on the number of people in the household.

A technical conference with the differing perspectives might identify some risks in the assumptions used in the savings calculations and the savings expectations would be the most important part for most residents in Sandford that first have to pay out of pocket to convert or replace their heating equipment.

A technical conference would have allowed discussion of the survey population selection. How did the survey account for the self selection bias? Enbridge understands the possibility of bias and with regard to those interested in heat pumps, states on page 6 of their December 21, 2023 letter in response to Environmental Defence, "Consumers having any desire to obtain natural gas service may be understandably reluctant to participate in such a survey, which would in turn make the survey results unreliable for the purpose of assessing consumer interest in connecting to the natural gas system."

In addition to missing the technical discussion of the Enbridge evidence the evidence that I have gathered locally was only briefly described in Letters of Comment and was not presented and investigated through a technical conference. I have survey evidence from conversations with my rural Sandford neighbours who already have space heating and do not require gas in order to keep warm. My survey evidence is quite different from the results of the survey for Enbridge and the source of this difference could be explained by self selection bias. My survey results were gathered from all the neighbours who were home and answered the door without knowing ahead of time the reason for the knock at the door.

I can say from personal experience that it is easy to live a very convenient life in Sandford without gas. I believe my evidence would be helpful to the OEB because it is the only local perspective.

My local survey recorded 16 percent of users that did not want to consider gas before any discussion. I also remember the disappointment of our internet provider who obtained fewer connections than his pre-construction survey predicted.

A survey that provided full information about the heat pump alternatives and also shared information about greenhouse gas emissions from each alternative before asking whether they would connect to gas would likely indicate far fewer connections than the survey relied on for the financial forecast. I believe this is important to the OEB because information about fossil fuel burning contributions to green house gas emissions is more available to Sandford residents every day. By the time connections are forecast to start in 2025 many of those in surveyed in Sandford in September of 2022 will have learned a lot more about climate change and the urgency to switch to a heat pump.

My thoughts on #2 are that if Environmental Defence and I were both allowed to present evidence prior to a technical conference a different result is possible.

The evidence, if presented, would forecast fewer connections and a lower profitability index which would suggest a different decision.

Respectfully Submitted

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Born 316ppm CO₂ -- Year 2023 421ppm CO₂