



**BY EMAIL and RESS**

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August 14, 2024  
Our File: EB20240111

**Attn: Nancy Marconi, Registrar**

Dear Ms. Marconi:

**Re: EB-2024-0111 – Enbridge 2024-2028 Phase 2 – HRAI Motion**

We are counsel to the School Energy Coalition ("SEC"). SEC is unable to attend the Motion Hearing on Friday, August 16<sup>th</sup>, but writes to express our general support for the motion brought by the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI).

The refused interrogatories and technical conference questions are relevant to Issue 27. Based on its objections and previous submissions, Enbridge Gas continues to take an unduly narrow view of the scope of the issue and wants the OEB to consider it only from the perspective of the appropriate allocation of direct, or easily identifiable shared costs, between Enbridge Gas and Enbridge Sustain. SEC submits that the OEB must consider the broader indirect costs that benefit Enbridge Sustain, but are being borne by Enbridge Gas. To understand what these indirect costs may be, the OEB needs to understand the entire picture of this new business.

The context also matters. Enbridge Sustain is operating a business where some of its offerings will almost certainly benefit Enbridge Gas's regulated business, as compared to other product offerings that are available. For example, it is offering a hybrid heating solution (heat pump and gas furnace) as opposed to a heat pump-only option.<sup>1</sup> This added layer of complexity is a further reason that the information is relevant and should be disclosed.

The information sought in the refused HRAI's interrogatories and technical conference questions is of a type that will assist SEC, other ratepayer groups, and the OEB, in having the necessary evidence to make such an assessment if Enbridge Sustain is being subsidized, even indirectly, by Enbridge Gas.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

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<sup>1</sup> For example, see Technical Conference Transcript Day 4, p.86, p.5



cc: Brian McKay, SEC (by email)  
Applicant and intervenors (by email)