

August 14, 2024

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street  
P.O. Box 2319  
Toronto, Ontario  
M4P 1E4

Dear Ms Marconi

**EB-2024-0111 – Enbridge Gas Inc. – Rates - Phase 2 – HRAI Motion**

We represent the Consumers Council of Canada (Council) in the above-referenced proceeding. On August 6, 2024, the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) filed a Notice of Motion requesting an order requiring Enbridge Gas Inc. (EGI) to provide “full and adequate responses” to certain interrogatories, technical conference questions and undertakings arising from the technical conference.

The evidence requested by HRAI relates to Issue 27 in the proceeding – *Has Enbridge Gas demonstrated that Enbridge Sustain’s activities are not funded through rates?* The Council is supportive of HRAI’s motion. As stated in the Notice of Motion with respect to its request for Enbridge Sustain’s Business Plan, “Central to understanding whether the Enbridge Sustain business is being subsidized by ratepayers, or will be in the rate period, is understanding the nature of the unregulated business, and the costs of that business and how they will be funded.”<sup>1</sup> The Council agrees and EGI should be required to file the Business Plan.

With respect to HRAI’s other requests, the Council is of the view that the information requested will also be critical in assessing whether Enbridge Sustain is being subsidized through rates. This is important to the Council as it represents those who pay rates. EGI should be required to explicitly demonstrate that it is not providing any direct or indirect subsidies to Enbridge Sustain.

Yours truly,

**Julie E. Girvan**

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CC: All parties

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<sup>1</sup> HRAI Notice of Motion, dated August 6, 2024, p. 3

