

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

August 26, 2024

**EB-2022-0335 Enbridge IRP Pilots
Pollution Probe Correspondence**

Dear Ms. Marconi:

Pollution Probe received new materials filed by Enbridge Friday evening which relate to technologies proposed in the IRP Pilot project. The OEB may be aware of the interrelation between the Enbridge IRP Pilot proposal and Enbridge materials filed the evening of Friday August 23, 2024 in EB-2024-0111 in response to a recent OEB order flowing from the HRAI Motion. The new materials include activities and/or technologies that are part of the IRP Pilot filed in this IRP Pilot proceeding. A copy of the new materials filed by Enbridge is appended to this correspondence [PollutionProbe_Correspondence_Appendix_EGI_IRR-Re.HRAI Motion].

It is too early to assess the full impact of this new information since it was only provided Friday evening and there has been no ability for discovery and testing of this material. From an initial review, it appears that certain technologies (e.g. gas heat pumps, Hybrid Heating, etc.) proposed by Enbridge are intended to lock-in natural gas use rather than promote non-gas options aligned with the true intent of IRP. This further reinforces the importance for the OEB to ensure that any proposed IRP Pilot technologies achieve their intended IRP purpose of testing alternatives to natural gas use rather than to reinforce the need for natural gas. Pollution Probe recommends that the OEB consider these issues when determine next steps in the IRP Pilot proceeding.

Procedural Order No. 4 provided the opportunity for stakeholder to provide additional input on an Oral Hearing component as part of this important proceeding. The OEB noted Pollution Probe's request and Pollution Probe believes that the OEB understands the importance and impact of this proceeding to have a positive or negative impact on the future of IRP in Ontario. Pollution Probe would caution considering the delays from the Enbridge abeyance requests as a basis to rush through consideration of the newly proposed Pilot project and the related technologies proposed. It has been almost two years since the 2022 IRP Pilots deadline set by the OEB. The current proceeding has only recently recommenced and Enbridge has put forward a new project proposal which has not been previously assessed. Pollution Probe has been a strong proponent of advancing effective IRP in Ontario and has been promoting advancement of timely IRP pilots since 2021. However, it is more important to get the IRP pilots right than to approve a potentially faulty proposal which could delay effective IRP for many years to come.

Respectfully submitted on behalf of Pollution Probe.



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