

January 21, 2025

VIA EMAIL

Nancy Marconi

Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: 2026-2030 DSM Plan Application – Intervenor Status Requests
Response of Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
EB-2024-0198**

We are counsel to Enbridge Gas. This letter is the response of Enbridge Gas to the intervention requests filed in the above-noted proceeding.

Enbridge Gas is in receipt of intervenor status requests from the following parties:

- Building Owners and Managers Association (“**BOMA**”)
- Canadian Manufacturers & Exporters (“**CME**”)
- Coalition of Concerned Manufacturers and Businesses of Canada (“**CCMBC**”)
- Consumers Council of Canada (“**CCC**”)
- Energy Probe Research Foundation (“**EP**”)
- Environmental Defence (“**ED**”)
- Green Energy Coalition (“**GEC**”)
- Housing Services Corporation (“**HSC**”)
- Independent Electricity System Operator (“**IESO**”)
- Industrial Gas Users Association (“**IGUA**”)
- Low-income Energy Network (“**LIEN**”)
- Minogi Corp. (“**Minogi**”)
- Ontario Greenhouse Vegetable Growers (“**OGVG**”)
- Pollution Probe (“**PP**”)
- School Energy Coalition (“**SEC**”)
- Small Business Utility Alliance (“**SBUA**”)
- Three Fires Group Inc. (“**TFG**”)
- Vulnerable Energy Consumers Coalition (“**VECC**”)

With the exception of the matters and interventions discussed below, Enbridge Gas does not object to the balance of the intervenor status requests filed.

Summary of the Response of Enbridge Gas

The Company submits that for the reasons set out in this response, it would be appropriate for the OEB to:

- (i) deny the intervention request of SBUA;
- (ii) require parties that represent very similar interests to combine their interventions into one thereby reducing hearing time and cost claims. This should apply to: (i) ED, GEC, and PP; (ii) CCMBC and CME (and if the intervention request of SBUA is not denied, to SBUA); (iii) Minogi and TFG; and, (iv) LIEN and VECC.
- (iii) require certain parties (ED, BOMA, EP, PP and CCMBC) to provide further details and information in respect of their intervention requests in accordance with the OEB's *Rules of Practice and Procedure* (the "**Rules**").

Important Context for the Review of Interventions

Before turning to its submissions in respect of the intervention requests identified below, Enbridge Gas believes it is important to provide context for the purposes of this submission and the OEB's process for the determination of eligible intervenor participants.

On March 31, 2022, the OEB commenced a framework for the review of intervenor processes and cost awards (EB-2022-0011). This process culminated in the OEB delivering a report to the Minister of Energy and Electrification (the "**Minister**") dated September 27, 2024. While this OEB report to the Minister has not been made public, the Minister has clearly indicated support for steps that will support greater regulatory efficiency. In the Minister's December 19, 2024 renewed Letter of Direction (the "**Renewed Directive**") to the OEB, the Minister highlighted his expectation that the OEB ensure intervenors are cost effective, efficient and in the public interest.¹ The Minister expressed his expectations in this regard at page 8 of the Renewed Directive:

*Keep my office and ministry informed on the progress of implementing the 10-point action plan outlined in the OEB's Report Back dated September 27, 2024 on Intervenors and Regulatory Efficiency. I also expect that OEB management and staff will provide assistance, as appropriate, to Commissioners **by being proactive and diligent in ensuring that such report recommendations – and other good practices for ensuring intervenors are cost effective, efficient and in the public interest – are followed**, and that Commissioners are transparently advised, as appropriate given the independence of their adjudicative role, where staff believe improvements are required, **or intervenors need to be limited or directed** (emphasis added).*

Enbridge Gas submits that the Renewed Directive makes it clear that it should not be business as usual when it comes to accepting intervention requests without giving due consideration to how the intervenor process can be rendered more efficient. More specifically, this requires the OEB to consider whether an intervenor is representing ratepayers and whether such interests overlap with the interventions of other groups making the consolidation of such interventions to be in the public interest.

¹ Renewed Letter of Direction from the Minister of Energy and Electrification to the Chair, December 19, 2024, p. 8 ([link](#)).

In 2023, the OEB's review of intervenor processes resulted in amendments to Rule 22 of the Rules. One of the purposes of the amendments was to clarify the meaning of substantial interest, which is a prerequisite for intervenor standing. The amended Rule 22.02 now reads:

22.02 The person applying for intervenor status must satisfy the OEB that he or she has a substantial interest and intends to participate responsibly in the proceeding. A person has a substantial interest if they have a material interest that is within the scope of the proceeding; for example, a person that: (i) primarily represents the direct interests of consumers (e.g., ratepayers) in relation to services that are regulated by the OEB; (ii) primarily represents an interest or policy perspective relevant to the OEB's mandate and to the proceeding; or (iii) has an interest in land that is affected by the proceeding. Examples of participation include participating in discovery, making submissions, and filing evidence.

To support an intervention request and satisfy the obligation incumbent on an intervenor to demonstrate they have a substantial interest in a proceeding, intervenors are now required to complete an intervention request form and respond to specific questions as set out in Appendix A to the Rules. It follows that where responses to the specific questions asked are incomplete or inadequate, this should reflect upon the intervenors' alleged substantial interest in the proceeding. Where intervenors fail to provide enough information to substantiate their specific interests at an early stage in a proceeding, this can lead to costly inefficiencies and unnecessary inquiries.²

Enbridge Gas is of the view that a number of the intervention requests filed do not clearly establish a governance structure which could be relied upon by the OEB to find that the positions taken by a particular intervenor reflect the interests of specified stakeholders and that such stakeholders are aware of and support the positions being taken. The OEB should direct certain parties to provide more detailed explanations about how they are governed and operate. It also appears clear that there is a substantial degree of overlap in the interests between certain intervenor groups and that for the OEB to meet the Minister's expectations as set out in the Renewed Directive, some combining of interventions should be ordered by the OEB.

It should be recalled that approximately \$1.24 million in cost awards were paid out to intervenors following the completion of the last multi-year DSM plan application (EB-2021-0002) even after netting out those cost award disallowances ordered by the OEB. This figure excludes the costs of the OEB itself and the internal and external costs of Enbridge Gas having to respond to the large number of interventions that were approved in the last multi-year DSM plan application.

It should also be recalled that the OEB ordered the establishment of a Stakeholder Advisory Group (the "**SAG**") in its Decision and Order in respect of the last multi-year DSM plan application (EB-2021-0002) for the purposes of informing the development of the next multi-year DSM plan, which is the subject of this proceeding. Enbridge Gas worked with the SAG throughout and held

² In the recent franchise agreement renewal proceeding for Lennox and Addington County in EB-2024-0134, the OEB was forced to cancel a scheduled hearing date, for which other parties had prepared, at the eleventh hour because the Concerned Residents (vaguely described as a group of concerned residents) ultimately determined their issues were out of scope for the hearing. It was open for the OEB to reach this conclusion at a much earlier stage in the proceeding based on the intervenors' stated concerns in their intervention form and other submissions.

numerous stakeholder sessions for the purposes of both developing and finalizing the multi-year DSM plan application which has now been filed.

Enbridge Gas believes that the time and costs incurred working with the SAG and holding the stakeholder sessions was valuable and that this should result in hearing time reductions and cost savings in this proceeding. This appears to have also been the expectation of the OEB which stated in its Decision and Order that: “Although not a requirement, gaining the agreement of the DSM SAG should be considered a top priority to allow for a more efficient and effective regulatory process.”³ Importantly, a more efficient hearing would facilitate the OEB issuing a final decision and order in this matter on a timely basis, which is critical given the Company’s need to have approvals in place in advance of January 1, 2026 to allow for the continuation of the Enbridge Gas and IESO one-window offering and to meet the expectations of the Minister in this regard.⁴

Enbridge Gas submits that the OEB can streamline the hearing process⁵ without compromising the ability of parties to advocate their positions in a number of helpful ways.

SBUA

While SBUA was an intervenor in the last multi-year DSM plan application (EB-2021-0002) it has for the most part not participated in any DSM activities since.⁶ Importantly, unlike the majority of other stakeholders, the SBUA declined its invitation to attend the DSM stakeholder consultation session held on March 26, 2024⁷ for the purposes of reviewing and discussing with intervenors various options in terms of the 2026-2030 DSM Plan Application. The SBUA did not participate in any of the subsequent stakeholder consultation sessions. Enbridge Gas submits that SBUA’s participation in the various stakeholder consultations was, at a minimum, a prerequisite for a determination that it has a substantial interest in this proceeding. Enbridge Gas believes that a stakeholder’s interests do not only arise for the purposes of a regulatory proceeding every three to five years.

As well, Enbridge Gas has concerns about SBUA’s governance structure and its actual existence in Canada. Enbridge Gas undertook a search and could find no registration of any kind for SBUA in Canada other than some vague statements in its intervention request about SBUA conducting outreach and education to small businesses on utility issues (which quite possibly has occurred only in the United States). There is no evidence of how the positions taken by SBUA will actually be considered and approved by small businesses in Ontario. The fact that SBUA declined to attend the stakeholder consultation sessions which Enbridge Gas and OEB staff hosted should give rise to questions about its representation of small businesses in Ontario in that they clearly

³ EB-2021-0002, OEB Decision and Order, November 15, 2022, p. 92 ([link](#)).

⁴ Renewed Letter of Direction from the Minister of Energy and Electrification to the Chair, December 19, 2024, p. 6 ([link](#)); <https://news.ontario.ca/en/release/1005538/ontario-launches-new-energy-efficiency-programs-to-save-you-money>.

⁵ It is worth recalling that the EB-2021-0002 proceeding took a total of 590 days from the date of filing to the date of the OEB’s final Decision and Order.

⁶ SBUA was an intervenor in the 2021 DSM Deferral and Variance Account Application (EB-2023-0062). Its positions as stated in its final submission were virtually indistinguishable from other submissions and were not specific to small business interest.

⁷ One of the key members of SBUA’s consultant Green Energy Economics Group is Frances Wyatt. Being a member of the SAG he was invited to all stakeholder consultations. He did not attend on behalf of SBUA and gave no indication that any information from these stakeholder consultations was being passed along to Ontario members of the SBUA.

did not inform their alleged members of the proposals by Enbridge Gas for the purposes of providing any comments and input back in response to same.

Enbridge Gas therefore does not believe that SBUA should be granted intervenor status.

Enbridge Gas further wishes to clarify one matter raised in the SBUA intervention request. The intervention states that its proposed expert consultants, the Green Energy Economics Group, are members of the SAG. This is not correct. One of the principals of the Green Energy Economics Group, Mr. Frances Wyatt, was a member of the SAG. Under the OEB's Terms of Reference for the SAG, participants on the SAG were selected by the OEB as individuals, not representatives of specific organizations.⁸

Representation of Similar Interests

Enbridge Gas notes that there is a significant number of parties (18) requesting intervenor status for this proceeding. Based upon the intervention requests filed, a number of these intervenors represent very similar interests.

(i) ED, GEC, and PP

Enbridge Gas believes that it is appropriate at this time for the OEB to recognize the hearing efficiency and cost savings that would be realized by the combining of the interventions of ED, GEC, and PP. Traditionally, each of these parties have been granted intervenor status and each has engaged counsel or consultants who ask voluminous interrogatories and who undertake extensive cross examination of the witnesses and experts presented by the Company.

Enbridge Gas notes that ED and GEC indicate in their interventions that they intend to jointly engage the Energy Futures Group to provide expert evidence for this proceeding. In addition, we note that counsel to GEC, with Mr. David Poch's retirement, now operates from the same firm as counsel to ED. The GEC intervention states that GEC and ED will coordinate their efforts and, where possible, combine efforts and use one counsel, but states that this may not always be possible. Neither the ED nor GEC interventions state why the interests of the two groups are not aligned in respect of this specific proceeding. In respect to PP, there is nothing in its frequent intervention form which suggests that its interests are in any way inconsistent with those of ED and GEC. There is, therefore, no evidence which exists which supports a determination that the combining of these three interventions and representation by one counsel would be prejudicial to any one of ED, GEC or PP.

For example, Enbridge Gas expects that ED, GEC and PP as standalone intervenors will each seek detailed (and in many cases similar) information through interrogatories to support their interests of promoting non-natural gas alternatives such as electric heat pumps. The approaches taken by these intervenors throughout several recent OEB proceedings are largely consistent and indistinguishable from each other. Their positions and ability to fully participate would not be compromised if these intervenors consolidated their interventions for this proceeding into one. The OEB regularly has to remind parties that represent similar interests (such as ED, GEC, and PP) to coordinate their interventions, especially with respect to interrogatories. Merging these

⁸ SAG Terms of Reference, June 26, 2023, p. 3 ([link](#)).

interventions would ensure that the expectations of the Minister in respect of the efficiency of interventions as stated in the Minister's Renewed Directive will be met.

(ii) CCMBC, CME, and SBUA

It is not clear why the interests of CCMBC and CME do not overlap. Each of these entities represent businesses. While the CCMBC intervention form states that most of its members were former members of CME who left that organization over different views, there is no discussion in the intervention requests by either party that speaks to the question: if differences exist, are they wholly incompatible such that separate representation and ratepayer funding should be extended to both groups? Enbridge Gas submits that it is appropriate for the OEB to inquire further as to the gravity of these differences and whether the different views, if material, are in fact already expressed by other intervenors.

Should the OEB conclude that SBUA's intervention should be permitted, the Company notes that CME's frequent intervention form states that about 85% of CME's Ontario-based membership companies are small to medium sized business enterprises. There is no evidence before the OEB that there is any conflict between the views of the SBUA in comparison to the CCMBC or CME. At the very least, SBUA could be merged with CCMBC and/or CME.

(iii) Minogi and TFG

Enbridge Gas welcomes the full participation of Ontario's Indigenous communities and members in its proceedings. It notes that the Three Fires Confederacy includes a number of groups that make up the Anishinabek Nation. According to the Minogi intervention request, it represents the interests of the Mississaugas of the Scugog Island First Nation. To the extent that there has already been some combining of the interests of Indigenous groups by these parties, Enbridge Gas supports such efforts.

This being said, in reading the intervention requests and annual frequent intervenor filings of these two intervenors, it does not appear that there is any conflict of interest that exists as between these intervenors. On matters such as the need for consultation and respect for Indigenous rights, the views of these parties appear to be wholly aligned, but Enbridge Gas recognizes that the Nations represented have distinct rights. Given the fact that there is a large number of Indigenous groups in Ontario, Enbridge Gas believes, consistent with Minister's Renewed Directive, that the OEB should begin considering the appropriateness of combining such interventions such that they are required to coordinate their efforts through the same counsel and to participate as a single intervenor to the extent practical. This will undoubtedly save time and reduce the intervenor cost awards.

It is noteworthy that these two intervenors are represented not only by the same law firm but also the same lawyers within that firm. Enbridge Gas further notes that both of these parties are represented by the same counsel on the Indigenous Working Group.

In the alternative, the Company requests that the OEB specifically direct these intervenors to coordinate all aspects of their participation in the proceeding so as to reduce the volume of interrogatories and cross examinations during the hearing.

(iv) LIEN and VECC

In reviewing the intervention requests by these parties, it appears that there is a significant degree of overlap in that each represents the interests of low-income ratepayers (whether as owners or as tenants or by reason of age or infirmity). While the interests represented by one group may be somewhat different (larger or smaller in terms of demographics and number of associations that are involved), the objectives of each are indistinguishable, namely, they seek to represent the interests of low-income vulnerable ratepayers.

As well, we note that as of this date, only one of these intervenors has engaged counsel, LIEN. If the interventions were combined, presumably the currently unrepresented party would benefit from the involvement of counsel who will ensure that there is no overlap in terms of interrogatories, cross examinations and in the argument filed.

Intervention Requests which are Incomplete

(i) ED's Mandate and Objectives

In its intervenor status request, ED does not provide a complete description of its mandate and objectives. Specifically, ED does not indicate that its interests include the promotion of non-natural gas alternatives such as electric heat pumps.⁹

The omission is not a technicality. Throughout this proceeding Enbridge Gas expects that ED will advocate for significant increases to the proposed 2026-2030 DSM Plan budget for additional DSM programming, including for programs/incentives related to non-natural gas alternatives such as electric heat pumps, and for natural gas ratepayers to bear the burden of these costs. While ED is free to advocate for any position it chooses, ED should be required, at minimum, to provide a complete description of its mandate and objectives so that its submissions can be read in the appropriate context. Furthermore, the Company submits that ED is required to provide this information in accordance with the Rules.¹⁰

Enbridge Gas respectfully requests that the OEB require ED to file an updated intervenor status request to include its mandate and objectives with respect to the promotion of electric heat pumps, as well as any other mandate and objectives relevant to the proceeding that were not included in ED's intervenor status request.

(ii) BOMA and ED's Programs/Activities

In their intervenor status requests, BOMA and ED do not provide complete descriptions of the programs/activities carried out by each intervenor.

Regarding BOMA, the individuals representing this intervenor for this proceeding are the founders of and are employed by Enerlife, a company that "develops and manages energy conservation programs"¹¹ including pay-for-performance type DSM programs. Throughout this proceeding Enbridge Gas expects that BOMA will advocate for OEB approval of (and natural gas ratepayer

⁹ EB-2023-0313, ED Reply Submissions, November 29, 2023, p. 3: ED's interests include "...efforts to help consumers adopt heat pumps..." ([link](#)).

¹⁰ OEB Rules of Practice and Procedure, March 6, 2024, Appendix A, p. I ([link](#)).

¹¹ <https://www.enerlife.com/programs/>

funding for) pay-for-performance type DSM programs as part of the Company's 2026-2030 DSM Plan. While BOMA is free to advocate for any position it chooses, it should be required, at minimum, to disclose the commercial and financial interests of its representatives that will be appearing in this proceeding relating to the design and delivery of pay-for-performance type DSM programs so that its submissions can be viewed with the appropriate context. Furthermore, the Company submits that BOMA is required to provide this information in accordance with the Rules.¹²

Further, Enbridge Gas understands that there are a number of BOMA chapters across the province which, to some extent, operate independent of one another. It is not clear from the intervention filings made by BOMA how the broader Ontario chapters are informed by its consultants about issues and applicable proceedings and how decisions are made in respect of the positions to be taken. Enbridge Gas believes it is appropriate for the OEB to direct BOMA to provide greater detail on its governance structure in respect to how its representatives at OEB proceedings are instructed in respect of the submissions and positions that are taken.

Regarding ED, this intervenor actively carries out programs/activities related to the opposition to natural gas and the promotion of non-natural gas alternatives such as electric heat pumps (see Attachment 1 to this letter). As noted above, Enbridge Gas expects that ED will advocate for significant increases to the proposed 2026-2030 DSM Plan budget to support additional DSM programming, including for non-natural gas alternatives such as electric heat pumps, and for natural gas ratepayers to bear the burden of these costs. While ED is free to advocate for any position it chooses, ED should be required, at minimum, to provide a complete description of the programs/activities it carries out, including with respect to the promotion of non-natural gas alternatives such as electric heat pumps, so that its submissions can be viewed with the appropriate context. Furthermore, the Company submits that ED is required to provide this information in accordance with the Rules.¹³

Enbridge Gas respectfully requests that the OEB direct BOMA and ED to file updated intervenor status requests that identify the programs/activities described above, as well as any other programs/activities that are relevant to the proceeding that were not included in BOMA or ED's initial intervenor status requests.

(iii) EP, PP, and CCMBC

While EP and PP have participated in numerous previous OEB proceedings as stand-alone intervenors, the Company submits that their governance structures are not clear from the recent intervention filings. It is also not clear what are the interests of the specific parties that are allegedly represented and who such parties are. More precisely, it is not clear how EP and PP represent the direct interest of consumers and how those consumers provide input to EP's and PP's consultants that appear at OEB proceedings and make submissions.

CCMBC is a newer party to OEB proceedings. As noted earlier, Enbridge Gas has the same governance structure concerns and questions about how and what ratepayer interests are advanced by this party.

¹² OEB Rules of Practice and Procedure, March 6, 2024, Appendix A, p. I ([link](#)).

¹³ OEB Rules of Practice and Procedure, March 6, 2024, Appendix A, p. I ([link](#)).

Enbridge Gas requests that the OEB direct EP, PP and CCMBC to provide more complete information in their intervention request forms that includes answers and explanations to the above.

Intervenor Evidence

A number of the intervention requests filed reference the intent of certain intervenors to seek OEB approval to engage an expert for the purposes of generating a report and appearing as a witness at the oral hearing. Based on past practice, Enbridge Gas understands that the procedural order that the OEB will issue will require those intervenors seeking approval to file expert evidence to provide a detailed description of the proposed evidence and a cost estimate. Enbridge Gas believes it is premature at this time to comment on the proposed intervenor evidence that several intervenors reference in their intervention requests. The Company reserves its right to comment on the detailed proposals in respect of proposed intervenor evidence when they are ultimately filed. Enbridge Gas reserves the right to object to all or any portion of the intervenor evidence that is proposed.

Issues that are Out of Scope

Finally, several intervenors have referenced potential issues which they wish to raise during the proceeding which in the view of Enbridge Gas are wholly out of scope. Given past practice, Enbridge Gas understands that the procedural order which the OEB will issue will provide for a draft Issues List to be circulated and for submissions to be made thereon. Accordingly, the Company believes it is premature at this time to comment on the out of scope issues raised in several intervention requests. Enbridge Gas reserves the right to object to those issues, in whole or in part, and take the position that they are out of scope of this proceeding at the appropriate future date. In addition, Enbridge Gas reserves the right to seek an early determination by the OEB for clarity that issues that are included in the approved Issues List do not extend to some of the issues that certain intervenors have raised in their intervention filings which the Company believes are out of scope. In either instance, Enbridge Gas notes that the OEB's determination of an intervenor's eligibility to participate (i.e., its "substantial interest") should be informed by whether the intervenor's concerns will be addressed within the scope of the proceeding and it may therefore be necessary to revisit these determinations at the Issues List stage.¹⁴

Yours truly

AIRD & BERLIS LLP



Dennis M. O'Leary

¹⁴ In its Procedural Order No. 2 in the Enbridge Gas franchise agreement renewal proceeding for the Township of Guelph/Eramosa (EB-2024-0188), the OEB called for intervenors to provide more specific additional information about how their concerns equate to them having a substantial interest in the proceeding.

Attachment 1: Example of Programs/Activities Carried out by ED

Heat Pumps Beat Gas Hands Down



Fact

1 The cost of gas expansion projects is paid for in part with a \$0.23/m³ surcharge in gas expansion communities.

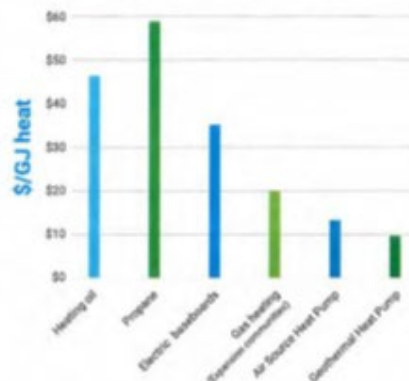
Enbridge Gas is building pipelines to supply fossil gas in new areas across the province. This expansion is paid for by a **\$1 per month subsidy** from all Enbridge Gas customers and a **\$0.23/m³ surcharge for customers** in gas expansion communities. This means that homeowners in these new gas communities who opt for a gas hookup will pay almost **50% more** per cubic metre than Enbridge's existing customers. Homes that are set back from the road may also be charged extra to run the gas lines to their home.

Using a heat pump is the most cost-effective heating solution in gas expansion communities.

A heat pump moves heat rather than generating heat, making it far more efficient and **more cost effective** to operate than any other heating option available in Ontario's gas expansion communities. During the winter of 2024, a home that heats with a cold climate air source heat pump (ccASHP) would spend **one-third less** on home heating than if they had installed a gas furnace. With a ground source heat pump (GSHP), the cost of heat would be **cut in half**.

And homes that avoid hooking up to gas will **save an additional \$300 per year** in gas connection charges.

\$/ (unit heat output) at winter 2024 rates



Fact 2 There are incentives available for households that are installing heat pumps.

The Greener Homes Loan program¹ that offers **interest-free financing for heat pumps** and other energy efficiency measures is still operating.

Grants of up to **\$10,000** are also available through the Oil to Heat Pump Affordability Program².

If your home is electrically heated (e.g., baseboards) and you have a low to moderate income, you could be eligible for a **free heat pump** (including installation) from the province's Save on Energy program³.

Ask your installer about these and other incentives available in your area.

Fact 3 Heat pumps will benefit you in other ways.

A heat pump is basically an air conditioner that can work in reverse. In summer, a heat pump pulls heat from the home and dumps it outside, and in winter it pulls heat from outside to heat your home (there is still heat in even cold air). With summers heating up, having access to **cooling** in summer is no longer a luxury, it is a necessity.

Many homeowners with a heat pump will tell you that their home is more comfortable⁴ since it has been installed. This is because heat pumps provide more even heat throughout the day and operate more efficiently when setbacks are minimized.

All electric homes also protect you from **toxic fumes from gas** equipment and reduce the risk of **childhood asthma**.⁵ Thirteen percent of childhood asthma in the United States is attributable to gas stove use.⁶ Keeping gas out also eliminates the risk of **carbon monoxide poisoning**.

A heat pump is also one of the most important steps that you can take to reduce your **climate** impact, save on carbon taxes, and protect yourself from volatile gas prices.

Fact 4 Ask about alternatives to upgrades to electrical panels when installing heat pumps and other electric appliances.

Ask your electrician about smart panels, circuit sharers, circuit pausers and breaker consolidation^{7,8}. These are all options to avoid an electrical service or panel upgrade when adding new electrical appliances.



Zero interest
financing
available



Check if you are
eligible for a free
heat pump



Learn how to save yourself
time and money by electrifying
on a 100 Amp panel



No matter how you look at it, heat pumps
are your best option for home heating.

¹ <https://natural-resources.canada.ca/energy-efficiency/homes/canada-greener-homes-initiative/canada-greener-homes-loan/24286>
² <https://natural-resources.canada.ca/energy-efficiency/homes/canada-greener-homes-initiative/oil-heat-pump-affordability-program/24775>
³ <https://saveonenergy.ca/For-Your-Home/Energy-Affordability-Program/Air-Source-Heat-Pumps> ⁴ <https://www.cleanairealliance.org/heat-pump-testimonials/> ⁵ CBC, After seeing how gas stoves pollute homes, these researchers are ditching theirs, April 7, 2022 (<https://www.cbc.ca/news/science/gas-stoves-air-pollution-1.6394514>) ⁶ Taylor Gruenewald et al, Population Attributable Fraction of Gas Stoves and Childhood Asthma in the United States, Int. J. Environ. Res. Public Health 2023, 20(1), 75 (<https://doi.org/10.3390/ijerph20010075>) ⁷ <https://homes.rewiringamerica.org/articles/electrical-panel/how-to-electrify-home-100-amp> ⁸ <https://www.perinsulacleanenergy.com/wp-content/uploads/2023/02/Design-guidelines-for-home-electrification-v021023.pdf>

March 20, 2024

Ontario Clean Air
Alliance Research





environmental
defence



Join us in person on May 8th from 7 to 8:30 PM in Newmarket, to discuss energy efficiency for your home and the potential of heat pumps as a cleaner and cheaper alternative to heat your home.

EVENT DETAILS

Date: May 8th, 2024 **Time:** 7 PM - 8:30 PM

Location: 707 Srigley St, Newmarket, ON L3Y 1X4 (Royal Canadian Legion Branch 426)

Maybe you've heard about heat pumps but aren't sure if they are a good fit for you, or you are interested in exploring what options are available other than natural gas (also known as toxic fossil gas).

Gas has traditionally been the cheapest source of energy, but heat pumps have come a long way and are now the cheapest and safest way to heat your home and water.

Hear from research scientist **Erik Janssen from the Toronto and Region Conservation Authority's Sustainable Technologies Evaluation Program**, as well as **Art Lightstone, an educator and local homeowner in Newmarket** on the benefits of switching to a heat pump.

Presentations will be followed by a question and answer session with our speakers on all things heat pumps!

With gratitude,



Keith Brooks
Programs Director, Environmental Defence