

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
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Toronto, ON M4P 1E4

February 18, 2025

**EB-2023-0343 East Gwillimbury Community Expansion Project Leave to Construct  
Pollution Probe Correspondence**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's Reply Submission dated February 13, 2025. In this submission Enbridge made certain statements pertaining to Pollution Probe that extend beyond the standard course of a Reply Submission and Pollution Probe would like to ensure that the OEB is aware that Pollution Probe does not agree with the assertions or conclusions Enbridge has surmised. There were several new statements included in Enbridge's Reply Argument that are not based on facts in the proceeding and do not actually represent Pollution Probe's approach or position. Pollution Probe simply suggests that the OEB review parties submissions based on the facts provided and avoid attributing weight to the assertions included in the Enbridge Reply that are not based on fact or reality.

Pollution Probe does not intend to restate the facts included in its Submission submitted February 3, 2025 and the record is clear on the information as outlined in that submission. The following is a short summary of the items related to Pollution Probe's approach and position where these facts were misrepresented in Enbridge's Reply Argument. Pollution Probe has only included a few examples below and this should not be deemed as endorsement of the broader assertions or conclusions in Enbridge's Reply Argument that are not specifically addressed below.

As Enbridge has flagged in this proceeding, there are some similarities across natural gas expansion projects proposing to leverage Natural Gas Expansion Program grant funding and it is reasonable to expect some commonality for specific issues that are common across a set of proposed projects. Any common issues are only a focus in this proceeding because of the relevance to the proposed Project in this proceeding. Those similar issues from previous projects has provided Enbridge ample opportunity to strengthen its approach in this and future application. By dismissing at face value any views or analysis that varies from Enbridge's application, Enbridge has dismissed the opportunity to close those gaps and improve its approach in a more defensible manner. However and perhaps more importantly, it is clear that each project application needs to stand on its own facts and merits<sup>1</sup>. If one project is approved or denied, it does not automatically mean that the next project should be approved or denied automatically. This relates to the challenge Pollution Probe has flagged about Enbridge's selective consideration of past decisions as potential precedents that extend beyond the scope of a specific

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<sup>1</sup> When it makes sense, the OEB has the ability to consider projects jointly, but in this proceeding the OEB has decided that proceeding will focus on the proposed project alone.

proceeding. Enbridge has acknowledged this approach in the past when it indicated that “while there are some commonalities at a high level across the NGEP portfolio regarding the need for natural gas and government support for the projects, the physical and financial characteristics of the projects are sufficiently distinct from one another”<sup>2</sup> and “key aspects of the [expansion] projects and associated proceedings will be unique”<sup>3</sup>. The facts of each project are case specific and Pollution Probe has used the specific facts in this application as the basis its Submission. If the application facts were different, the Pollution Probe submission would be different. As the OEB is aware, PP has encouraged the OEB to look for opportunities to increase alignment, efficiency and consistency through joint proceedings when expansion project are common enough to enable those benefits<sup>4</sup>. Pollution Probe understands why that was not done in this case.

Enbridge surmises that “their [ED and PP] submissions are not genuinely grounded in protecting ratepayer financial interests but rather serve as a tool to advance their goal of opposing natural gas in favour of electrification”<sup>5</sup>. This assertion is not correct and does not actually represent the position Pollution Probe put forward or the specifics of its Submission. Pollution Probe continues to use objective facts to consider options in the public interest regardless of whether they are natural gas or electrification proposals. This includes the current value of the natural gas system, as appropriate. The exploration of those trade-offs goes well beyond the scope of this proceeding. Real customer choice requires accurate, objective and transparent information, but Pollution Probe has not assumed the choices of individual consumers beyond the facts on the record. A deeper dive into consumer intent would have required additional consumer surveys. Pollution Probe’s analysis based on the facts provided is clear.

Pollution Probe has not asked the OEB to favour electrification or to order Enbridge to install ccASHPs in this proceeding as Enbridge suggests. Pollution Probe has leveraged a consistent, open and transparent approach to considering all forms of energy (including natural gas and electricity) when considering project specifics, current and future consumer net benefits and policy impacts of proposed projects. Pollution Probe has been a supporter of natural gas and related infrastructure for projects where they objectively provide the best option and the need and attachment forecast has been adequately demonstrated, thereby optimizing system outcomes and avoiding wasted Capital spending and stranded assets. Customer choice is important and this must not be construed as favoring natural gas or other options without objective analysis. Pollution Probe’s Submission included an objective alternative for the OEB to consider based on the facts of the project.

Pollution Probe has highlighted objective<sup>6</sup> benefits of customer alternatives such as cold climate heat pumps (ccASHPs), and these benefits are widely known and understood. Contrary to Enbridge’s assertion, Pollution Probe has not suggested that a single alternative technology such as a ccASHP will fit every customer circumstance or choice. There is a wide variety of options for consumers and even more with the recent Provincial programs launched through IESO. Enbridge has outlined in its work with Guidehouse that individual scenario and assumptions can be modelled in a manner that favour natural

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<sup>2</sup> EB-2023-0343 \_EGI\_LTR\_Response\_PP\_20240910\_eSigned, Page 1.

<sup>3</sup> EB-2023-0343 \_EGI\_LTR\_Response\_PP\_20240910\_eSigned, Page 2.

<sup>4</sup> EB-2023-0343 PollutionProbe\_Correspondence\_20240903.

<sup>5</sup> EGI\_Reply Submissions\_20250213, Page 5.

<sup>6</sup> Based on unbiased third party information.

gas over alternatives<sup>7</sup>. Although those scenarios were not developed for this project or focused on the proposed customers in this community, Pollution Probe's Submission and supporting calculations clearly stated that there is a likelihood that some customers may choose to connect to natural gas. The fact is that if one less customer attaches than forecasted by Enbridge, the project no longer meets the OEB or NGEF grant criteria.

Enbridge's assumptions compared to non-gas alternatives were not thoroughly assessed in this proceeding and the OEB will have the opportunity to conduct a thorough review when Enbridge files the updated information related to natural gas and non-gas alternatives, including ccASHPs<sup>8</sup>. A focus of this proceeding is not whether all customer will move to electric heat pumps today, but whether the natural gas attachment assumptions and financial calculations are reliable enough over the next 40 years to protect ratepayers from those additional costs and to avoid the inefficiency of stranded assets that should have been better assessed and mitigated.

Respectfully submitted on behalf of Pollution Probe.

A handwritten signature in black ink, appearing to read "Michael Brophy", is positioned above a horizontal line.

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Cc: Enbridge Regulatory (via email)  
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Richard Carlson, Pollution Probe (via email)

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<sup>7</sup> EGI\_Reply Submissions\_20250213, paragraphs 17 – 20.

<sup>8</sup> EB-2024-0111 dec\_order\_Set Prop\_EGI\_2024\_Rates\_Ph2\_20241129, Exhibit N Tab 1 Schedule 1 Page 34.