

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

April 16, 2025

EB-2022-0335 – IRP Pilot Project Application
EB-2025-0124 – Review Motion of IRP Pilot Project Decision
Pollution Probe Letter of Comment

Dear Ms. Marconi:

Pollution Probe is in receipt of the letter dated April 15, 2025 from Enbridge Gas Inc. (Enbridge) to the Ontario Energy Board (OEB) making several requests pertaining to the EB-2022-0335 Decision and pending EB-2025-0124 review proceeding. The EB-2025-0125 proceed was also alluded to, which is forward focused and not specifically related to the EB-2022-0335 proceeding or Decision. The limited scope and intent of the EB-2025-0124 review as stated by the OEB appears clear and additional details will follow through procedural orders. However, Enbridge has also requested that the OEB order a stay or suspension of the aspects of the EB-2022-0335 Decision that are under review. If granted, a stay could undermine the integrated Decision and result in an implementation plan that is incomplete and inefficient.

As the OEB is aware, the OEB Decision and Order in EB-2020-0091 required Enbridge to develop and implement two Integrated Resource Planning (IRP) Pilot Projects prior to December 31, 2022. Multiple delays have resulted in no pilot projects being implemented and the EB-2022-0335 Decision has now enabled progress to be made on one of the required IRP Pilot Projects. Any uncertainty on future-oriented impacts to the IRP Framework beyond the IRP Pilot Project are not relevant to implementation of the IRP Pilot Project and could be assessed via EB-2025-0124 without delaying implementation of the IRP Pilot Project. Additionally, it is unclear what delays this would cause for Enbridge to complete an implementation plan and start pilot initiation activities. An expeditious process for EB-2025-0124 could ensure that Enbridge has the certainty needed prior to installation of certain equipment types in pilot participant buildings. There are many pilot activities that need to be developed and undertaken prior to actual implementation of specific equipment and those activities will take significant time. The focus of EB-2025-0124 does not appear to impact those early Pilot Project activities.

The EB-2022-0335 Decision was integrated based on the facts and record of that proceeding. A stay on any portion of that Decision could have negative consequences to the timely delivery of the Pilot Project. Based on Pollution Probe's review of the EB-2022-0335 Decision and information related to EB-2025-0124, it is recommended that the OEB not approve the stay request and that EB-2025-0124 proceed expeditiously as a written hearing. If Enbridge has a draft implementation plan already developed that it is able to share with the OEB, that could further ensure that the OEB timings mitigates any potential IRP Pilot Project delays.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Cc: Richard Carlson, Pollution Probe (via email)
All Parties to EB-2022-0335 (via email)