

April 22, 2025

**BY EMAIL AND FILED VIA RESS**

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. ("Enbridge Gas", or the "Company")  
EB-2022-0335 – IRP Pilot Project Application  
EB-2025-0124 – Review Motion of IRP Pilot Project Decision  
Enbridge Gas Request Re: Scope of Review Motion**

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We represent Enbridge Gas.

On April 15, 2025, we wrote to the OEB asking for confirmation about the scope of the Review Motion arising from the March 27, 2025 Decision and Order in the IRP Pilot Project Application (the "Decision"). We also requested a stay of aspects of the Decision.

On April 16, 2025, Pollution Probe wrote to the OEB submitting, among other things, that no stay should be ordered since that would delay implementation of the IRP Pilot Project.

Without responding to all of the items set out in Pollution Probe's letter, Enbridge Gas does want to make one thing clear as there appears to be some confusion. Enbridge Gas is planning to proceed with the implementation of the IRP Pilot Project (including the related engagement and filing of an updated detailed project plan) and is not waiting for the outcome of the Review Motion to commence that work. This includes proceeding with the electrification measures at the limited participation levels proposed by Enbridge Gas in the Application. The stay request in our April 15<sup>th</sup> letter that specifically relates to the IRP Pilot Project is only in relation to the direction in the Decision to redirect funds relating to advanced natural gas technologies to electrification IRPAs. That specific item is clearly at issue in the Review Motion, and Enbridge Gas submits it is appropriate to stay the related direction until the Review Motion is determined. Enbridge Gas can and will proceed with other aspects of the approved IRP Pilot Project in the meantime. Enbridge Gas will not include any advanced natural gas technology IRPAs (including thermal energy storage) without further direction from the OEB.

Yours truly,

AIRD & BERLIS LLP



David Stevens

c: all parties in EB-2022-0335