

BY EMAIL AND RESS

February 2, 2026

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

Dear Mr. Murray:

**Re: EB-2025-0064 Enbridge Gas Phase 3 – 2024 Rebasing
Enbridge Gas response to Environmental Defence/GEC evidence request**

On January 28, 2026, Environmental Defence Canada and Green Energy Coalition (ED and GEC) filed a letter requesting leave to file evidence relating to Issue 13(d) energy comparison information.

Enbridge Gas submits that the OEB should reject this request. The proposed evidence is beyond the scope of the outstanding issue, is requested too late and will unduly expand and extend this Rebasing Phase 3 proceeding.

ED/GEC Request

ED/GEC assert that Enbridge Gas has posted new cost comparison information online, and they request that Chris Neme of Energy Futures Group conduct a high level assessment of whether the information comparing energy costs for a heat pump (ASHP) and gas furnace is “fair, accurate and appropriate”. ED/GEC assert that the reason for its late request is that Enbridge Gas had previously stated that it would not be providing cost comparison information to the public, and that has now changed. They assert that the cost comparison information posted is “misleading”.

Relevant Facts

Enbridge Gas filed evidence¹ and answered interrogatories² on Issue 13(d), which addresses whether the Company has satisfied directions and commitments to file marketing and reference materials that include cost comparison information.

The prefiled evidence indicated that Enbridge Gas is not using any marketing or reference material including cost comparison information.

¹ Phase 3, Exhibit 1, Tab 16, Schedule 1.

² Exhibit I.1.16 interrogatories.

The interrogatory responses, filed in July 2025, included a reference to updated online materials for the Company's DSM Home Renovation Savings Program which now include a disclaimer after the Federal Carbon Charge (FCC) was set to zero. As stated in the interrogatory response:

This disclaimer, which includes cost comparison information, was added to inform gas customers who have installed or who are in the process of installing an electric heat pump about the potential financial impact. The disclaimer was added in response to legislative changes that directly impacted the HRS Program offering. It serves a specific purpose and does not represent any intent or decision to change Enbridge Gas's current approach to its marketing materials as set out at Phase 3 Exhibit 1, Tab 16, Schedule 1.³

The disclaimer information used by Enbridge Gas in the referenced materials clearly indicates that customers should be aware that setting the FCC to zero “changes the economics of electric heat pump operation, particularly for natural gas customers who are looking to offset some or all of their space heating energy consumption with an electric heat pump” and informs customers that their bills may increase and that they should work with their contractor. Indicative information is provided within the disclaimer about the estimated energy costs for ASHPs and gas furnaces, along with detailed explanations of the sources for all information used. It is this indicative information that ED/GEC refer to as cost comparison information.

This disclaimer information was also filed in the EB-2024-0198 DSM Rollover Application for 2026.⁴

Around September 2025, Enbridge Gas posted information to customers informing them of an opportunity to participate in the South Lake Huron IRP Pilot Project⁵, referred to as “Sarnia Saves”.⁶ One of the offerings related to ASHPs. The ASHP offering for the SLH IRP Pilot Project is very limited (there is a cap of 20 participants).

The materials attached to the ED/GEC letter were part of the Sarnia Saves online materials. These materials included the same disclaimer language as has been used previously for the Home Renovation Savings Program. The materials also included the same indicative information about estimated energy costs for ASHPs and gas furnaces.⁷

ED/GEC's Request is beyond the scope of Issue 13(d)

Issue 13(d) asks:

Has Enbridge Gas identified and responded appropriately to all relevant OEB directions and Enbridge Gas commitments made in OEB proceedings (inclusive of

³ Exhibit I.1.16-PP-23. The link to the disclaimer page is found here -

<https://www.homerenovationsavings.ca/without-assessment/heat-pumps>

⁴ EB-2024-0198, Exhibit C, Tab 2, Schedule 2, Attachment 1, filed June 20, 2025.

⁵ EB-2022-0035.

⁶ [Sarnia Saves - Up to \\$15,000 in Home Energy Rebates for Sarnia, Brights Grove and Point Edward | Ontario | Enbridge Gas.](#)

⁷ Enbridge Gas may use the same disclaimer language (including indicative information about estimated energy costs) in the future, including in relation to the IRP system pruning pilot project.

any relevant directions arising from the OEB's pending decision on Phase 2), including those relating to:

d) filing updated written marketing materials or reference materials aimed at customers, potential customers, HVAC contractors or builders that include or previously included energy comparison information

Enbridge Gas has met its commitments. Issue 13(d) does not ask whether the Company's marketing materials include every stipulation or condition that other parties might request. Issue 13(d) does not ask what are the best assumptions to be used to compare ASHPs and high efficiency furnaces. It simply asks whether Enbridge Gas has provided the relevant materials. The Company has done so.

Even if Issue 13(d) is read broadly, the intent is to ensure that the Company has done as expected based on earlier OEB direction. In the EB-2022-0200 Decision and Order, the OEB directed Enbridge Gas *"to review the energy comparison information currently on its website and printed materials to determine whether it fully discloses what is being compared and on what basis, and what assumptions are being used for the comparison."*⁸ That has been done. The Company's new disclaimer information is necessary because of setting the FCC to zero, and it includes extensive detail about the assumptions used, and advises customers to make their own investigations.

ED/GEC's request is too late, and will unduly complicate Phase 3

The online posting about which ED now seeks to file evidence contains exactly the same information as prior materials used by Enbridge Gas that were filed with the OEB and provided to all parties in two different proceedings over the past year. The Sarnia Saves online posting cited by ED was used in a very limited manner, for the SLH IRP Pilot that sought 20 participants for an ASHP offering.

Enbridge Gas submits that it is too late for ED/GEC to now complain and indicate that this is "new" and that they need to file evidence. The disclaimer materials that ED/GEC now attack were filed in two separate OEB proceedings in July 2025. These parties have been aware of these materials for many months. It is not appropriate to seek leave to file new evidence now, many months after this could have been done in an efficient manner.

As seen in their evidence request, ED/GEC seek to turn Phase 3 into an investigation about whether the assumptions used by Enbridge Gas are the same as ED's consultant would advocate. That is not what is or should be at issue. It is not the OEB's role to dictate the assumptions and calculations that must be used when disclosing performance of energy appliances.

Issue 13(d) does not ask what are the best assumptions to be used to compare ASHPs and high efficiency furnaces. It asks if Enbridge Gas has complied with the OEB's directions. It is clear that Enbridge Gas has done so.

⁸ EB-2022-0200 Decision and Order, December 21, 2023, page 46.

Allowing ED/GEC to file new evidence in the coming weeks or months is certain to add to the time and cost and complexity of the remaining Phase 3 issues. Among other things, it is highly likely that Enbridge Gas will then find it necessary to file responding evidence, and there will then have to be a discovery process. Further, it is not clear to Enbridge Gas at this time whether Mr. Neme can properly be considered an expert as to the appropriate assumptions to make when comparing ASHPs and high efficiency gas furnaces. This concern could require an oral hearing.

Enbridge Gas's 2024 Rebasing case is already more than 3 years old. Regulatory efficiency is not served by expanding the scope of the final remaining issues in the case and ensuring that the process will run for many more months.

ED/GEC can pursue their questions elsewhere

In any case, if ED/GEC wish to question the assumptions made by Enbridge Gas about the operating characteristics of gas furnaces and ASHPs in the indicative information provided in the current disclaimer statement, then that is more appropriate in a DSM proceeding (assuming that such items are found to be relevant to a proposed DSM program).

Enbridge Gas has filed the same disclaimer wording in the current EB-2025-0295 DSM Plan proceeding which is just commencing now. It can be found at Exhibit E, Tab 2, Schedule 1, Attachment 1 in the prefiled evidence for that case.⁹ If ED/GEC believe that there are problems with the disclaimer wording, then they can seek leave to file evidence in that case.

Please let us know if you have questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

C: all parties in EB-2025-0064

⁹ <https://www.rds.oeb.ca/CMWebDrawer/Record/926310/File/document> (page 638-641).