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Mr. Ritchie Murray
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Toronto, ON M4P 1E4

March 3, 2026

**EB-2025-0306 Lanark and Balderson Community Expansion Project Leave to Construct
Pollution Probe Interrogatories to the Applicant**

Dear Mr. Murray

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant. The document is being filed early to assist all parties.

Respectfully submitted on behalf of Pollution Probe.

A handwritten signature in black ink, appearing to read "Michael Brophy", written over a horizontal line.

Michael Brophy, P.Eng., M.Eng., MBA
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Cc: Enbridge Regulatory (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Lanark and Balderson Expansion Project
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

March 3, 2026

**Submitted by: Michael Brophy
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

1-PP-1

The majority of community expansion Leave to Construct projects filed be Enbridge to the OEB in the past year or two have been in the form of an exemption request.

- a) Please explain why Enbridge did not seek an exemption for this project application and how that decision was made compared to recent exemption requests.
- b) If Enbridge is using a guideline to determine which Leave to Construct projects should be an exemption request or a full application, please provide a copy of the materials.

1-PP-2

Enbridge indicates that the project was identified by the Government of Ontario on June 9, 2021, as one of 28 projects across 43 communities selected for funding in the second phase of its Natural Gas Expansion Program (NGEP).

- a) Please provide a copy of the approvals from the Government of Ontario and the OEB for this Project, and please highlight the specific approvals and scope related to the project approved.
- b) Please identify any variances between the information in the NGEP application and the information in this application. If the variances to the NGEP application are significant (e.g. cost, connections, etc.), please explain the process to reapply to NGEP for the altered project or amend the project application to align with the updated project (i.e. what approvals are required and what is the process).
- c) Please confirm that NGEP approval for access to grant funding does not automatically provide Leave to Construct (or other required regulatory) approvals related to this project.
- d) Please provide any previous approvals received from the Government of Ontario and/or the OEB related to the proposed project.
- e) Is there a mandated timeframe under NGEP for completion of the proposed pipeline? If yes, please provide the relevant condition that dictates specific timing.
- f) Please confirm that Enbridge will not proceed with the project (or any of the discrete segments) without OEB Leave to Construct approval.

1-PP-3

- a) Please explain the reasons and timing related to breaking the project into 2 different phases.
- b) Enbridge notes that the Project is proposed to be built in two phases over approximately 20 months [D/1/1, page 1]. This exceeds the typical timeframe for Leave to Construct approval and the timing contemplated in the generic Conditions of Approval. What special approval or relief is Enbridge seeking related to timelines for OEB Leave to Construct approval?
- c) Please provide a copy of Table 1: Forecasted Customer Attachments for the Project [B/1/1, page 6] broken down by Phase 1 and Phase 2.

1-PP-4

Please explain what system(s) will feed natural gas to this project over the 40 year project horizon (per E/1/1, page 2, paragraph 7)) and what the excess capacity is on those systems to facilitate this. If there is no excess capacity (now and over the next 40 years) to feed this project, please explain what upgrades will be required and the estimated costs of those upgrades.

1-PP-5

The project includes **Ancillary facilities** including a new distribution station, approximately 7.2 km of NPS 2 PE distribution mains and customer services (meters, regulators and service pipelines). [B/1/7, page 1]

- a) Please confirm that the ancillary facilities are part of the project. If not, please explain.
- b) Please explain the impact if the ancillary facilities were not constructed.
- c) Please confirm that any terms and conditions (e.g. conditions of approval) apply to the whole project, including the ancillary facilities. If not correct, please explain.

1-PP-6

References: Letters of support were provided by the Township of Drummond/North Elmsley and the Township of Lanark Highlands in 2020 to support Enbridge Gas's proposal for natural gas expansion within their respective communities as part of Phase 2 of the NGEF process. The County of Lanark has also emphasized its support of the Project via a letter of support dated November 18, 2025. [B/1/1, pages 2-3]

- a) Please provide the 2020 letters of support noted above.
- b) Was an updated letter of support requested from the Township of Drummond/North Elmsley and/or Township of Lanark Highlands?
- c) Please confirm that Enbridge provided the Township of Lanark the recommended wording for its 2025 letter.
- d) Why is a more current updated letter of support not available from the Township of Drummond/North Elmsley?
- e) Was any other correspondence received from the impacted municipalities or local stakeholders (including potential customers) since 2020. If yes, please provide copies.
- f) Have any presentations been made to the Township of Drummond/North Elmsley and/or Township of Lanark Highlands since 2020? If yes, please provide a copy.

1-PP-7

References: Exhibit B, Tab 1, Schedule 1, Attachment 4.

- a) Enbridge notes that "prior to being surveyed, respondents were given an Enbridge Gas brochure that outlined the benefits and costs (including the System Expansion Surcharge and Federal Carbon Pricing Program), associated with switching to natural gas. Please provide a copy of this brochure and any other materials provided to those surveyed.
- b) Please provide the average time per household taken to administer the survey. If Enbridge or Forum Research need to estimate this, please provide the assumptions used to calculate the estimate.

3-PP-8

Reference: Table 1: Forecasted Customer Attachments for the Project [Exhibit B, Tab 1, Schedule 1, page 6]

Please indicate what date year 1 in the table represents.

3-PP-9

A total of 121 surveys was completed from a list of 297 home owners. [B/1/1, Attachment 4, page 2]. However, Enbridge notes that the total population that could be attached (including residential, commercial and industrial) is 286 [B/1/1, page 6, Table 1]. Please reconcile and explain how more surveys could be targeted than the total potential attachment number for the project.

3-PP-10

Reference: Exhibit B, Tab 1, Schedule 1, Attachment 4, page 2.

The Forum Research survey notes that this survey response rate was average when compared to the 45 Ontario communities surveyed, which included: Allenford, Astorville, Auburn, Augusta, Ayton, Ballinafad, Belwood, Benmiller, Bobcaygeon, Boblo Island, Brennan Line (Orillia), Cedar Springs, Cedar Springs-Burlington, Cherry Valley, Edwardsburgh-Cardinal, Eganville, Elmwood, Enniskillen, Featherstone, Glendale, Grafton, Hidden Valley, Kincardine (Lucknow/Ripley), Kincardine (other communities), Kincardine Commercial (Lucknow/Ripley), Kincardine Commercial (other communities), Lambton Shores, Lanark-Balderson, Meaford, Milverton, Neustadt (x2), North Bay, Prince Township, Ramara, Salford, Sandford, Selwyn, Sheffield, Swiss Meadows, Turkey Point, Warwick, Washago-Orillia, Williamsford and Wroxeter Gorrie Fordwich.

- a) Please provide a table showing the following for each of the 45 surveys referenced above:
- Total survey population identified, number of responses and response rate
 - Percent of respondents that overall were likely (extremely likely, very likely or likely) to connect to natural gas.
- b) Please provide a table indicating the status of each of the projects referenced above, the in-service date and for those that are in-service the total customers that have actually attached to-date. Please also include the OEB docket number for each project name, if available.

- c) For each of the 45 projects referenced above, please provide the estimated project cost (per the OEB application and Decision), the actual cost and Portfolio Index (PI) of each of the in-service projects referenced above based on current actuals.

3-PP-11

References: Enbridge Gas will continue to engage with stakeholders, including holding events within the community and providing information and support to residents to ensure that residents' questions and concerns are addressed and forecasted customer attachments are realized. [B/1/1, page 3]

Please provide a list of any current stakeholder engagement not already documented in the application and a copy of any materials used.

3-PP-12

Has any more recent research been conducted since the survey was undertaken in June 2023? If yes, please provide copies of the materials and results.

3-PP-13

References: Exhibit B, Tab 1, Schedule 1, Attachment 3 (pages 1-5).

- a) Please provide the calculations and reference materials to support the Enbridge marketing statement "Save up to 65% by switching to natural gas".
- b) Please provide the calculations and reference materials to support the Enbridge marketing statement that customers will lower carbon emissions by switching to natural gas.
- c) The Enbridge marketing material notes that prospective customers can calculate how much they can save with natural gas by going to enbridgegas.com/savewithgas ([Community Expansion | Ontario | Enbridge Gas](#)). However, there does not appear to be any savings information included in that reference. Please explain and provide the current information available when prospective customers inquire for this project.
- d) Please confirm that the comparison for natural gas estimated savings compared to electricity in the "Residential annual heating bills" chart is based on baseboard electric heating. If not please provide the details.
- e) Has any of the information changed from that included on pages 1-5 of the marketing material reference above (including the estimated bill impacts)? If yes, please provide the most current information and references.

3-PP-14

References:

Exhibit B, Tab 1, Schedule 1, Attachment 3 (page 3): “Residential annual heating bills” marketing material footnote indicates that “Electric cold climate air source heat pumps are available but not included in the savings calculations”.

Exhibit B, Tab 1, Schedule 1, page 4: Forum Research survey material brochure provided a link to a Natural Resources Canada website that has information regarding the availability of non-natural gas alternatives such as electric heat pumps.

Please explain why cold climate electric heat pump information was not included in the “Residential annual heating bills” marketing materials, but was included in the survey reference material?

3-PP-15

Reference:

PollutionProbe_IR_AppendixA_HomeRenovationSavingsProgram_20260305

- a) Please confirm that the above noted attachment represents the current joint IESO/Enbridge Home Renovation Savings Program and that the website source is correct and accurate. If not, please provide copies and the source of the current program materials.
- b) Please confirm that Enbridge and IESO launched the joint program in 2025 and that it continues to be offered.
- c) Please confirm that the Home Renovation Savings Program adopted the IESO Save on Energy incentives that are offered province-wide. If incorrect, please explain why.
- d) Has Enbridge done any analysis on the impact to energy use and/or attachment rates if prospective customers undertook the full suite of available DSM incentives under the Home Renovation Savings Program? If no, why not. If yes, please provide a copy of the analysis and results.

3-PP-16

References:

PollutionProbe_IR_AppendixB_HomeRenovationSavingsProgramASHPs_20260305

Please confirm that the above noted attachment represents the joint IESO/Enbridge Home Renovation Savings Program incentives related to heat pumps and that the

website source is correct and accurate. If not, please provide copies and the source of the current heat pump incentives from IESO and/or Enbridge.

3-PP-17

Did Enbridge obtain a courtesy bid or other third party estimate to validate that the project costs are reasonable? If not, why not. If yes, please provide a copy of the documentation.

3-PP-18

Reference: Table 1: Estimated Project Costs [E/1/1, page 1]

Enbridge notes that the project is consistent with contingency amounts calculated for other Phase 2 NGEF projects. However, the other NGEF project (East Gwillimbury per EB-2023-0343 EGI_UPDATED_APPL_20260213) currently being considered by the OEB through a similar review process appears to have contingencies significantly below this project. This project appears to be approximately 50% higher (13.06/8.74).

Item	Lanark & Balderson Project EB-2025-0306	East Gwillimbury Project EB-2023-0343	Difference
Contingency	\$2,430,298	\$1,135,515	
Total Cost	\$18,606,994	\$12,999,254	
% Contingency	13.06%	8.74%	4.32%

Please explain the basis of the significantly higher contingency applied to this project and please provide supporting documentation.

3-PP-19

Reference: DCF calculated based on rates as per EB-2024-0111 Effective January 1 2025. [Exhibit E, Tab 1, Schedule 1, Attachment 2]

Enbridge filed a full settlement on harmonized rates proposed to be effective starting in 2027 (EB-2024-0063). Please provide the impact on the DCF analysis and PI for this project using the harmonised rate starting in 2027.

3-PP-20

Reference: The DCF analysis includes this NGEF funding of approximately \$8.4 million, which is treated similarly to a contribution in aid of construction (“CIAC”). The total capital cost net of funding over the 10 year attachment horizon is \$4.6 million. [E/1/1, page 7]

- a) Please provide any confirmation available that Enbridge will still receive the full \$8.4 million in project subsidy from NGEF even though the scope (i.e. cost of the project and number of forecasted customers served) decreased from the NGEF application approved.
- b) If the NGEF subsidy for this project is decreased based on the decreased project scope, please confirm that ratepayers will not be requested to pay the extra costs.
- c) Please confirm that the reduced project costs and inclusion of the full \$8.4 million is required to meet the calculation to provide a PI=1.0.

3-PP-21

Reference: PollutionProbe_IR_AppendixC_ExpansionProjectPI

Recent Enbridge Community Expansion Projects have shown a trend of decreasing Portfolio Index (PI) and a lower actual PI than forecasted in the OEB Leave to Construct proceedings. This has also caused the actual Project Portfolio to dip below the OEB required PI=1.0.

Has Enbridge updated the analysis noted above or is this the most up to date version? If it has been updated, please provide the updated materials and table.

3-PP-22

Has Enbridge conducted a risk assessment on the probability that the proposed pipeline will become a stranded asset before being fully depreciated? If yes, please provide a copy of the assessment and all related materials. If no, what evidence exists to support that the pipeline will remain used and useful for the full amortization period.

4-PP-23

Reference: The TSSA has yet to provide their review of the design. [D/1/1, page 6]

Please confirm that Enbridge would be agreeable to a condition of approval being “Enbridge shall file a copy of the TSSA review and approval prior to initiating construction”. If Enbridge disagrees, please indicate why?

4-PP-24

- a) Please provide a copy of the any materials not already filed, but used for public consultation including those used for the Open House.
- b) Please provide a copy of all marketing and communication material provided by Enbridge or partners to consumers/businesses in the community to promote DSM or other energy efficiency opportunities when considering renovation of a primary (water/space) heating system(s).
- c) Please provide a copy of all communication material provided by Enbridge or partners to educate consumers/businesses on options and incentives under all DSM programs and including the Home Renovation Savings Program jointly funded by IESO and Enbridge.

4-PP-25

Reference: The Environmental Report identifies shallow bedrock along the route, 493 water wells, two Provincially Significant Wetlands and significant wildlife habitat within the study area. [Exhibit F, Tab 1, Schedule 1, Attachment 1]

- a) Has Enbridge undertaken any field survey along the proposed route to identify the length of bedrock that will be encountered? If no, why not. If yes, please provide the documents and estimated lengths of bedrock.
- b) Does Enbridge anticipate requiring blasting in any areas along the proposed route? If no, why not. If yes, please provide details.
- c) What is the closest water well located to the proposed pipeline?
- d) Has Enbridge conducted a pre-construction well monitoring program along the proposed pipeline? If yes, please provide a copy.
- e) What cost estimate has Enbridge included in the project for well monitoring during construction?
- f) If bedrock is encountered at the water course crossings or near wetlands, what alternate crossing method and related approvals will be required?

4-PP-26

Reference: Exhibit F, Tab 1, Schedule 1, Attachment 1, pages 173 and 231.

The proposed route in this application appears to differ from the preferred route included in the Environmental Report. Please explain why and how the public, affected landowners and agencies were notified of any changes.

4-PP-27

Please provide a copy of the detailed mitigation plan for the proposed pipeline.

4-PP-28

Please provide any additional stakeholder and OPCC comments/correspondence since the application was filed.