

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
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March 9, 2026

**EB-2025-0306 Lanark and Balderson Community Expansion Project Leave to Construct  
Pollution Probe Submission on CNL Evidence**

Dear Mr. Murray

In accordance with Procedural Order No. 2 for the above-noted proceeding, please find attached Pollution Probe's submissions related to the proposed evidence from Climate Network Lanark (CNL). Procedural Order No. 2 extended the timeline for submitting comments on the CNL evidence proposal and also extended the deadline for Enbridge Gas (Enbridge) to file responses to interrogatories by one week. Pollution Probe filed its interrogatories in advance of other parties and several days in advance of the March 5, 2026 deadline. Based on Enbridge's letter of comment filed March 4, 2025, we believe that providing our interrogatories early should assist Enbridge with the timing/resource constraints highlighted in their letter. The timing of CNL's evidence proposal and allocation of time to provide these comments has no real impact on any other procedural element in this proceeding. Pollution Probe supports the one week extension provided to Enbridge in order to allow their resources to fully and adequately respond to the interrogatories. However, this should not distract from the validity and relevance of the evidence request.

Pollution Probe interrogatories included several inquiries to help understand the details of the Enbridge customer survey undertaken in mid-2023. Aside from the dated nature of the Forum Research survey, there appears to be some gaps and challenges with the survey undertaken and this directly impacts the information filed to support the economic analysis that underpins the application. Although we do not expect full interrogatory responses until the extended deadline date, it is reasonable to expect that Enbridge should be able to provide a thorough and adequate basis to support any submissions that the survey information and results it filed in its application is current, sound and based on objective results that would be the same if a current assessment objective assessment was undertaken now, as proposed by CNL. The extrapolation of the survey result are a principal input into the forecasted project revenues (i.e. resulting in a Portfolio Index of precisely 1.0). Any deficiency or uncertainty associated with the survey information or extrapolation for revenue forecasts over the 40 year project term would result

in the project not complying with OEB requirements and exclude the project from ratepayer funding.

CNL has requested approval to:

- 1) submit affidavit evidence relating to:
  - Local views on the proposed project, including views in the impacted municipalities that have not indicated support for the project;
  - Enbridge marketing to potential local customers, and whether it has been fair and accurate; and
  - Factors that may have a potential impact on the number of connections.
- 2) retain a public opinion research firm to (i) critique the survey completed by Enbridge and (ii) conduct an updated survey.

In approving CNL's request for intervenor status, the OEB specifically recognized CNL's community focused issues, including the customer connection estimate and survey filed by Enbridge<sup>1</sup>. In approving CNL's status in this proceeding, it appears that the OEB may already be aware of the importance the attachment survey and the potential impact that discrepancies in local information could have, compared to that included in the application. A prudent assessment will require the relevant information to be placed on the record.

Pollution Probe suggests that there is a sound and valuable basis for the OEB to approve the CNL requests noted above. The assumptions applied to this project will have real ratepayer impacts over the next 40 year and perhaps longer if the project is not economic (i.e. PI=1.0 or above) and Enbridge requests additional ratepayer subsidy to recoup shareholder losses. The stakes are even higher since energy consumers in this community will need to fund costly retrofits to make a switch to natural gas. Those costs are incremental to the ratepayer costs included in the application. Current programs available to energy consumers in this community (including Ontario Save on Energy programs for homes heated by electricity, propane and wood) could decrease equipment costs for electric options, but it appears that information was not provided to consumers during the 2023 survey.

The customer forecast and related 40 year revenue estimate is one of the largest uncertainties related to this project and also has the highest risk impact on ratepayers (current and future). Reducing risks and uncertainty through the CNL proposal would help provide the evidentiary basis required for the OEB to consider the reasonableness and accuracy of the forecasted attachments and related revenues.

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<sup>1</sup> PO1\_EGI\_Lanark Balderson LTC\_20260218.

Additionally, there is a large number of discrete differences when the project in this application is compared to past system expansion projects. A sample of those differences is highlighted by the questions Pollution Probe included in the interrogatories filed. If Enbridge believes that its customer survey is sound and reliable for 2027 through 2067 (40 year project period), it should not be opposed to enabling CNL to proceed with the request. At the end of the day, the OEB will apply the weight it believes is appropriate to the Enbridge survey and all supplemental information available, including any evidence filed by CNL. Enbridge may also suggest that the OEB has a precedent to automatically reject any request for a party to undertake and file supplementary survey materials and results. There is no such precedent that can be applied to this and all future proceedings. This project and application is distinct and separate from other system expansion projects as it relates to the specific community, project details and current options available (which will impact real consumer choice). Any suggestion that there is a past precedent that effectively preapproves this application on the basis of a past system expansion decision(s) is not accurate. If that were true, there would be no need to review the application at all. This application should be considered on the merits of its specifics, including validation of the local information specific to this project.

Respectfully submitted on behalf of Pollution Probe.



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