

Elson Advocacy

April 14, 2026

Ritchie Murray

Registrar/A
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Mr. Murray

**Re: Enbridge Gas Inc. – Lanark and Balderson Pipelines
OEB File #: EB-2025-0306**

I am responding to Enbridge’s letter to the OEB of March 23, 2026. In that letter, Enbridge argues that the Climate Network Lanark’s (CNL) interrogatories were inappropriate. Enbridge’s criticisms are without merit.

First, Enbridge criticizes CNL for basing its interrogatories in part on the interrogatories of Environmental Defence in past gas expansion cases. This is not inappropriate – it is efficient. There is a significant degree of shared interests between Environmental Defence and CNL.¹ It would not have been an efficient use of time for us to completely start from scratch when preparing interrogatories touching on those shared interests. In preparing the CNL interrogatories, we used the interrogatories in previous gas expansion cases as a guide, but also omitted a significant number of past interrogatories and added several new questions. This was efficient and appropriate.

Second, Enbridge argues that the interrogatories were too broad. However, it provides no examples. The CNL interrogatories all align with the issues the CNL indicated it wished to raise in its application for intervenor status.²

Third, Enbridge argues that it was inappropriate and inefficient for CNL to ask questions that have been answered in previous gas expansion cases as that is “unduly repetitive and burdensome.”³ This is disingenuous seeing as Enbridge routinely objects when a party seeks to rely on evidence in different Enbridge proceedings, even where that evidence was filed by Enbridge itself and the proceedings are closely related. For example, Enbridge objected to a party doing so in a previous gas expansion case, stating as follows:

¹ See the intervention applications of CNL and Environmental Defence.

² CNL intervention application ([link](#)).

³ Enbridge letter, Marcy 23, 2026 (“providing responses to these same interrogatories which were asked and answered, in several other community expansion proceedings, results in an unduly repetitive and burdensome process which does not result in an efficient and expeditious process for Enbridge Gas.”).

ED relied on evidence that was admitted in the other proceedings but does not form part of the evidentiary record in this proceeding related to the Project. Enbridge Gas does not consent to the admission of evidence filed in an unrelated matter in the Application or it being given any weight by the OEB in its adjudication of the Application related to the Project. As a result, any ED submission made with an attempt to justify those submissions through evidence from the unrelated proceedings should be rejected by the OEB and given no weight.⁴

If Enbridge objects to intervenors relying on Enbridge evidence filed in a different Enbridge proceeding, intervenors need to ask for the same information twice where that information is relevant to both proceedings. In any event, it is not burdensome for Enbridge to answer the same question it answered in a previous proceeding. It can simply provide a link that that previous interrogatory response if the information is unchanged.

It is not clear what relief Enbridge was seeking from the OEB by criticizing the CNL interrogatories in its letter of March 23, 2026. Regardless, Enbridge's criticisms are unfounded and unproductive. CNL's interrogatories were prepared in an effective and appropriate manner and were intended to obtain relevant evidence as efficiently as possible.

Yours truly,



Kent Elson

⁴ Enbridge submission in EB-2022-0111, April 8, 2024, p. 4 ([link](#)).