

**BY EMAIL AND RESS**

May 1, 2026

Ritchie Murray  
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 Pollution Probe motion**

---

On July 4, 2025, Enbridge Gas provided responses to the more than 500 interrogatories (not including sub-parts) filed in this proceeding. On July 16 and 17, 2025, Enbridge Gas presented five witness panels at a technical conference to answer follow-up questions on the interrogatories. As part of the technical conference, Enbridge Gas agreed to answer a further 82 questions in writing, as undertakings.

On July 18, 2025, Pollution Probe filed a letter asking the OEB to clarify the scope of two of the issues in this case, and to direct Enbridge Gas to file answers to several interrogatories that have been declined on the basis of relevance.

In Procedural Order No. 3 issued on August 1, 2025, the OEB stated that it will establish a process to address Pollution Probe's motion following the settlement conference. In Procedural Order No. 5 issued on April 21, 2026, the OEB directed Enbridge Gas to file its response to Pollution Probe's motion by May 1, 2026.

Pollution Probe's motion implicates two of the outstanding non-ratemaking issues being determined in the final stage of Phase 3 – Issue 13(c) re. Integrated Resource Planning (IRP) and Issue 13(d) re. written marketing and customer reference materials. Below, Enbridge Gas provides its response to each of these items.

**Issue 13(c) – response to IRP directions**

The main focus of Pollution Probe's motion is its position that Enbridge Gas has taken an unduly narrow view of Issue 13(c). That issue asks whether Enbridge Gas has identified and responded appropriately to all relevant OEB directions and Enbridge Gas commitments related to reporting on the status of the Company's responses to previous IRP directions. Pollution Probe asks that the OEB provide confirmation as to the scope of Issue 13(c). Pollution Probe also asks that the OEB direct Enbridge Gas to answer 6 interrogatories on this topic that have been declined.

Enbridge Gas submits that the scope of Issue 13(c) is clear, and no clarification is required. The narrow issue (which is a carry-over from Phase 2 of the Rebasing Proceeding) is simply whether the Company has appropriately responded to and met the OEB's directives and directions for IRP.<sup>1</sup> This follows from the commitment made in the OEB-approved Phase 2 / EB-2024-0111 Settlement Proposal, which stated as follows:

*A number of the Parties are concerned that progress on previous IRP directions from the OEB has been insufficient. In the interests of a more comprehensive settlement of this Phase 2 Rebasing proceeding, however, these Parties agree that Enbridge Gas should have a further opportunity to consider these concerns and demonstrate progress in response to these previous IRP directions. The Parties propose, and Enbridge Gas agrees, that the Company will file a report in Phase 3 of this Rebasing proceeding on the status of its responses to these previous IRP directions, for consideration by the Parties and the OEB.<sup>2</sup>*

The issue in Phase 3 is not a review and evaluation of the IRP Framework, or how it could be improved or changed. The OEB is considering that question separately. In the EB-2025-0125 consultation titled "Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas", the OEB shared an OEB staff report about IRP progress and impacts and opportunities to improve the efficiency and effectiveness of the IRP Framework, and then asked for stakeholder submissions in response.<sup>3</sup> On April 28, 2026, the OEB concluded that consultation and directed Enbridge Gas to file an updated IRP Framework for review, taking into account the proposals and submissions made by other parties in the consultation.<sup>4</sup> Regulatory efficiency is not served, but in fact is undermined, by examining the same issue(s) in multiple proceedings. The limited issue in this Phase 3 Rebasing case is simply whether Enbridge Gas has complied with the OEB's past directives and directions for IRP.

Enbridge Gas filed detailed evidence for this Phase 3 Rebasing case, setting out the OEB's directives and directions for IRP, and the actions that Enbridge Gas has taken in response.<sup>5</sup> Specifically, over the course of 33 pages of narrative evidence, Enbridge Gas sets out the 10 relevant directions that the OEB has made related to IRP, along with the Company's response to each one. Enbridge Gas has also filed very detailed IRP Annual Reports for 2023 and 2024, which total over 400 pages.<sup>6</sup> The Company filed responses to 33 interrogatories on this issue/evidence in the immediate proceeding, providing further details.<sup>7</sup>

Enbridge Gas received many interrogatories related to Issue 13(c), including 22 interrogatories (not including sub-parts) from Pollution Probe. Enbridge Gas declined to answer a small number of the interrogatories on this topic on the basis that the information requested is not relevant to

---

<sup>1</sup> This was confirmed during the technical conference – see 1TCTr. 12-13.

<sup>2</sup> [EB-2024-0111 Decision on Settlement Proposal and Interim Rate Order, November 29, 2025](#) – see Settlement Proposal, Exhibit N, Tab 1, Schedule 1, page 35, Issue 25(a).

<sup>3</sup> [OEB to Review IRP Framework | Natural Gas Integrated Resource Planning \(IRP\) | Engage with Us.](#)  
[https://engagewithus.oeb.ca/irp/news\\_feed/oeb-to-review-irp-framework](https://engagewithus.oeb.ca/irp/news_feed/oeb-to-review-irp-framework)

<sup>4</sup> [OEB letter titled "Next Steps - Integrated Resource Planning Framework Review for Enbridge Gas."](#)  
<https://www.rds.oeb.ca/CMWebDrawer/Record/940028/File/document>

<sup>5</sup> Phase 3 Exhibit 1, Tab 13, Schedule 5.

<sup>6</sup> Phase 3 Exhibit 1, Tab 13, Schedule 5, Attachment 1 and Exhibit I.1.13-ED.4, Attachment 1.

<sup>7</sup> Exhibits I.1.13-STAFF.2-4; I.1.13-BOMA.1; I.1.13-ED.1-5; I.1.13-PP.1-22; and I.1.13-TFG\_M.4-5.

the discrete IRP issue being addressed in Phase 3. The questions that were declined (almost all of which are from Pollution Probe) seek to gather information about specific IRP activities and actions, in an apparent attempt to micro-manage and/or second guess the Company's IRP activities. That is not part of Phase 3. Allowing Issue 13(c) to expand into a substantive review of IRP implementation risks duplicative processes and potentially inconsistent findings across proceedings. Moreover, Pollution Probe's attempted granular review of the Company's IRP activities ignores the fact that there has been a very active OEB staff-led IRP Technical Working Group that has been interacting with Enbridge Gas on the details of IRP.

The table attached as Appendix A to this letter sets out the 6 questions (interrogatories) related to Issue 13(c) that Pollution Probe says Enbridge Gas should answer, along with the specific reasons why each of these questions is irrelevant, out of scope and/or unnecessary.

Issue 13(d) – marketing/customer reference materials including energy comparison information

Pollution Probe also questions whether the scope of Issue 13(d) is sufficiently clear. Enbridge Gas submits that there is no need for additional clarity or guidance. The wording of the issue speaks for itself.

In the Phase 2 Rebasing Settlement Agreement, Enbridge Gas agreed to stop using marketing and customer-focused reference materials that include cost comparisons, unless the comparisons include electric cold climate heat pumps. Enbridge Gas agreed that it would file any updated cost comparison materials being used. This is set out at Issue 13(d).

In prefiled evidence, Enbridge Gas confirmed that it has stopped using its previous marketing materials that included cost comparisons without cold climate heat pumps and indicated that at that time the Company did not have updated marketing materials. Enbridge Gas also provided a representative set of its current marketing materials, showing that there are no cost comparisons included.<sup>8</sup>

Enbridge Gas has explained in this proceeding that it is disclosing cost comparison information in the form of a disclaimer to inform customers who have installed, are in the process of installing or are considering installing an electric heat pump through an Enbridge Gas offer about the potential financial impact in light of the Federal Fuel Charge being set to zero. Enbridge Gas has previously filed the disclaimer information in this proceeding<sup>9</sup>, and in the EB-2024-0198 DSM Rollover Application.<sup>10</sup>

Additionally, in a separate filing being made today, Enbridge Gas is filing the most current cost comparison disclaimer information that it has been using, in response to the April 17, 2026, letter from Environmental Defence.

Pollution Probe's motion complains that Enbridge Gas has not provided a complete answer to its interrogatory #23 (Exhibit I.1.16-PP-23). Pollution Probe asserts that Enbridge Gas should be required to provide "the full set of materials that are already updated in alignment with the OEB approved Settlement Proposal wording". This is not necessary. Enbridge Gas has confirmed

<sup>8</sup> Phase 3 Exhibit 1, Tab 16, Schedule 1, Attachment.

<sup>9</sup> Exhibit I.1.16-PP-23.

<sup>10</sup> EB-2024-0198, Exhibit C, Tab 2, Schedule 2, Attachment 1, filed June 20, 2025.

that, other than the aforementioned disclaimers being used for a specific purpose, it is no longer using marketing materials with cost comparisons. Pollution Probe provides no evidence (or even a suggestion) that the Company's representation that it is no longer using marketing materials with cost comparisons is inaccurate. No benefit is served by having the Company provide each and every instance of such materials, simply to confirm a representation already made. To the extent that Enbridge Gas is including cost comparison information in disclaimer wording that is being used, the documents and information about the disclaimer have been filed in this proceeding, in response to Exhibit I.1.16-PP-23 and in today's response to Environmental Defence.

Requested relief

Based on the submissions set out in this letter and the accompanying table, Enbridge Gas requests that the OEB decline Pollution Probe's requests and dismiss the motion.

Please let us know if you have questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

C: all parties in EB-2025-0064

Appendix A – List of Disputed Interrogatories from Pollution Probe’s Motion related to Issue 13(c)  
Page 1 of 4

Interrogatory		Interrogatory Request	Interrogatory Response	Detailed Explanation for Declining Response
Exhibit I.1.13-PP-2		Has Enbridge undertaken any continuous improvement, lessons learned or similar exercise to assess its implementation of IRP since 2021? If yes, please provide a copy of the internal reports, presentations or related materials.	As the information requested is beyond the scope of the Issues List, which pertains to reporting on the status of Enbridge Gas’s response to previous IRP direction, Enbridge Gas declines to provide the information requested.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. This is not a review and evaluation of lessons learned or potential future improvements for IRP. That would greatly (and inappropriately) expand the scope of Phase 3. Questions about the evolution of the IRP Framework are better addressed in the EB-2025-0125 Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas.
Exhibit I.1.13-PP-9	a	Enbridge indicates that it has developed new IRP processes to help advance consideration of IRP. Please provide a copy of each new process developed, indicate when it was implemented and highlight the improvement compared to the previous process at Enbridge.	As the information requested is beyond the scope of the Issues List, which pertains to reporting on the status of Enbridge Gas’s response to previous IRP direction, Enbridge Gas declines to provide the information requested.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. This request does not relate to the OEB’s directives and directions for IRP. Instead, this request is asking about the scope, review, oversight and evolution of IRP activities at Enbridge Gas. Effectively, Pollution Probe seeks to explore, understand and evaluate operational details about the Company’s conduct of IRP activities. That is not in scope for Phase 3. Requiring information such as this to be produced would greatly (and inappropriately) expand the scope of Phase 3.
	b	Please provide the scorecard and/or performance metric for the most senior position at Enbridge that has accountability for IRP results and compliance.	See above.	See above.
	c	Please explain what controls are in place at Enbridge to ensure that each IRP process is followed accurately. If a process (or IRP requirement documented in other materials such as guidance) is not properly followed by a department, please indicate the process of what occurs (i.e is there an investigation process, retraining requirement, etc.).	See above.	See above.
	d	Has an audit been conducted of the new IRP processes implemented at Enbridge? If yes, please provide a copy of the audit results (report, presentation and other relevant materials). If no, please explain why not.	See above.	See above.

Appendix A – List of Disputed Interrogatories from Pollution Probe’s Motion related to Issue 13(c)  
Page 2 of 4

Interrogatory		Interrogatory Request	Interrogatory Response	Detailed Explanation for Declining Response
Exhibit I.1.13-PP-10	a	Please provide copies of all guidance and training materials developed and delivered to Enbridge staff related to IRP requirements and advancing IRP alternatives. For each document, please provide a list of when it was delivered and how many staff from each department were trained. If other awareness and training activities have been conducted internally, please also provide details.	As the information requested is beyond the scope of the Issues List, which pertains to reporting on the status of Enbridge Gas’s response to previous IRP direction, Enbridge Gas declines to provide the information requested.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. This is not a review and evaluation of how Enbridge Gas has implemented and operationalized IRP. Even the IRP Technical Working Group does not engage at the level of detail requested. Requiring information such as this to be produced would greatly (and inappropriately) expand the scope of Phase 3.
	b	Please provide copies of all feedback (including training surveys) from Enbridge staff on the guidance and training materials delivered.	See above.	See above.
	c	Please provide a list of improvements made to IRP guidance and training materials since 2021 based on feedback collected from Enbridge staff.	See above.	See above.
	d	Please provide copies of all audits and assessments of IRP undertaken by Enbridge to assess compliance, understanding or to identify and mitigate potential gaps in effective delivery of IRP in alignment with IRP requirements.	See above.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. Enbridge Gas has filed evidence explaining how it has complied with virtually all IRP directions and directives. The Annual IRP Reports provide further information about IRP activities, as do the IRP Technical Working Group materials available online. This non-specific request goes beyond the scope of Issue 13 by asking about “effective delivery” of IRP. Also, the request is overly broad. It is not clear how providing the requested materials (if they exist) would assist the OEB in determining Issue 13.
Exhibit I.1.13-PP-14	a	Please provide Enbridge’s current estimate of how many IRP alternatives (not including the required pilots) will be executed by the end of this rate term in 2028.	Enbridge Gas has not developed an estimate. The decision on which alternative (or combination of alternatives) is in the best interest of Enbridge Gas and its customers is dependent on the evaluation of each system constraint. However, as outlined at Phase 3 Exhibit 1, Tab 13, Schedule 5, page 5, based on the current	N/A – this question was fully answered.

Appendix A – List of Disputed Interrogatories from Pollution Probe’s Motion related to Issue 13(c)  
Page 3 of 4

Interrogatory		Interrogatory Request	Interrogatory Response	Detailed Explanation for Declining Response
			screening and evaluation criteria, as well as the nature of the investments in Enbridge Gas’s AMP that address needs for safe and reliable service, it is unrealistic to expect that IRP will displace a substantial proportion of the Company’s facility projects.	
	b	Given that there is always going to be a list of AMP potential projects under assessment for IRP for all future years, please explain why the OEB should refrain from making ongoing and regular enhancements to the IRP Framework, including at this time.	As the information requested is beyond the scope of the Issues List, which pertains to reporting on the status of Enbridge Gas’s response to previous IRP direction, Enbridge Gas declines to provide the information requested.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. Questions about the evolution of the IRP Framework are better addressed in the EB-2025-0125 Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas.
	c	What is Enbridge’s proposal (time and process) for when the OEB should make changes to the IRP Framework?	See above.	See above.
Exhibit I.1.13-PP-21	a	Please provide the status and outcomes of the IRP Pilot evaluation contractor procurement process undertaken in 2024.	As the IRP Pilot evaluation contractor is not relevant to the approvals sought or Issues List in this proceeding, Enbridge Gas declines to provide the information requested.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. The relevant directive addressed by this interrogatory is that Enbridge Gas was required to design and implement pilot projects. The operational details of how a pilot project is being implemented (such as details about an evaluation contractor) are beyond the scope of Phase 3. It should be noted, though, that Enbridge Gas will continue to report on the SLH IRP Pilot Project through the IRP Technical Working Group and through the IRP Annual Reports. For example, the 2024 IRP Annual Report includes over 75 pages of details about the SLH IRP Pilot project implementation plans (see Exhibit I.1.13-ED-4, Attachment 1, Appendix H (IRP Pilot Project Update)).
	b	Please provide the scope of work and schedule for the IRP Pilot evaluation contractor.	See above.	See above.
	c	Was IESO included in the IRP Pilot evaluation contractor procurement process to align scope with	See above.	See above.

Appendix A – List of Disputed Interrogatories from Pollution Probe’s Motion related to Issue 13(c)  
Page 4 of 4

Interrogatory		Interrogatory Request	Interrogatory Response	Detailed Explanation for Declining Response
		IESO integrated energy planning needs and/or enable cost sharing? If no, why not. If yes, please provide details.		
Exhibit I.1.13-ED-3	a	Please file a copy of the DCF+ Supplemental Guide (the Guide) referred to in paragraph 49, the latest version, and a tracked changes copy showing the changes between them.	Enbridge Gas declines to provide a copy of the draft DCF+ Supplemental Guide. As noted at Phase 3 Exhibit 1, Tab 13, Schedule 5, page 22 the enhanced DCF+ test and the accompanying Guide will be filed for adjudication with the first non-pilot IRP Plan application.	Issue 13 asks whether Enbridge Gas has responded to and met the OEB’s directives and directions for IRP. The relevant direction here is that Enbridge Gas will file the DCF+ test in the first non-pilot IRP Plan application. Given that the OEB is not adjudicating the DCF+ test in this Phase 3 proceeding, it is not relevant or necessary to file the current (and not final) version of the DCF+ guide in this case.
	b	Does Enbridge have a copy of the DCF+ test that can be used to economically evaluate projects? If not, please indicate when it will be complete.	See above.	See above.