

Elson Advocacy

May 15, 2026

Ritchie Murray

Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Mr. Murray,

**Re: Enbridge Gas Inc. 2024 to 2028 Rates Application – Phase III
EB-2025-0064**

I am writing on behalf of Environmental Defence Canada and the Green Energy Coalition (“GEC”) to provide submissions on the motion by Pollution Probe for further and better responses to interrogatories seeking information on Enbridge’s compliance with IRP (“Integrated Resource Planning”) directives and with its commitments regarding energy cost comparison materials.

IRP Directives

Environmental Defence and GEC support Pollution Probe’s request for Enbridge to provide answers to all relevant questions regarding its compliance with OEB IRP directives. Enbridge argues that these interrogatories are out of scope and/or duplicative due to the pending IRP framework review. However, the review of the IRP framework has a forward-looking scope, whereas the issue in this proceeding is whether Enbridge has complied with past directives. Those questions are distinct, as is the potential relief that may arise therefrom.

Environmental Defence and GEC make no specific submissions on the specific IRP-related information sought by Pollution Probe as doing so would be duplicative and because Environmental Defence and GEC are not taking a leading role with respect to that issue. However, compliance with IRP directives is on the issues list and can only be appropriately addressed if Enbridge discloses relevant information requested from intervenors such as Pollution Probe.

Energy Cost Comparison Information

Similarly, Environmental Defence and GEC support full disclosure on the energy cost comparison information issue. Since Pollution Probe’s motion, Enbridge has filed additional materials on the record. It is therefore unclear whether Enbridge is maintaining its objection to the relevant Pollution Probe interrogatories, and if yes, over what. However, we understand from Pollution Probe that some energy cost comparison information still has not been disclosed,

including updated cost comparison materials that have been completed internally for potential customers in gas expansion areas but have not yet been released to the public.

If that is the case, said materials should be filed with the OEB in this proceeding. The applicable settlement agreement wording spoke of filing updated materials generally, without specifying that they would only be filed after they were delivered to the public.¹ In other words, there is no exception built into the settlement agreement allowing Enbridge to withhold updated cost comparison materials until after they have already been disseminated. Furthermore, from a practical perspective, it is most efficient if any updated materials that are pending release be examined at the same time as the other energy cost information materials already on the record.

As detailed above, Environmental Defence and GEC ask that the OEB order full disclosure from Enbridge on its compliance with the IRP and energy cost comparison materials directives.

Yours truly,



Kent Elson

cc: Parties to the above proceeding

¹ Enbridge Gas agrees that beginning 45 days after the filing of this Settlement Proposal, Enbridge Gas shall not include statements, including cost comparison charts, related to the relative cost-effectiveness of natural gas heating or to savings that can be achieved with natural gas heating in written marketing materials, or reference materials aimed at customers, potential customers, HVAC contractors, or builders, that the Company distributes unless it includes a comparison with the relative cost-effectiveness of heating with electric cold climate heat pumps. This includes all such material disseminated in Ontario by Enbridge Gas, or by Enbridge affiliates on behalf of Enbridge Gas, to customers, potential customers, HVAC contractors, and builders.

Enbridge Gas agrees that updated materials shall be filed in Phase 3 of the 2024 rates proceeding, or in a subsequent proceeding if not complete at that time.