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May 22, 2026

VIA E-MAIL

Ms. Nancy Marconi
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

**Re: EB-2025-0064 Enbridge Gas Inc. (EGI)
2024 Cost of Service Phase 3 – Environmental Defence (ED) Motion
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

In accordance with Procedural Order No. 5 please find attached questions of VECC in the above-noted proceeding. We have also forwarded a copy to ED.

Yours truly,

A handwritten signature in black ink, appearing to read 'M. Garner', is written over a light blue horizontal line.

Mark Garner
Consultants for VECC/PIAC

Email copy:

Kent Elson, Elson Advocacy, Counsel for Environmental Defence Canada and the Green Energy Coalition
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Vanessa Innis, Manager, Strategic Applications, EGI
EGIREgulatoryproceedings@enbridge.com

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME	VECC
TO:	Enbridge Gas Inc. (EGI)
DATE:	May 22, 2026
CASE NO:	EB-2025-0064 – ED Motion
APPLICATION NAME	Evidence Review of Enbridge Hearing and Cost Comparison Chris Neme (Neme)

ED-VECC-1

“Generally speaking, the other documents in which Enbridge has recently presented heating costs comparisons are similar in structure.”

Reference – Neme, page 3

- a) Please provide all the documents that the author is referring to in this statement.

ED -VECC-2

Reference – Neme, page 2

“Overall, given all the variables involved, the most effective way to inform customers of the energy bill impacts of switching from a gas furnace to a heat pump is to show the full range of changes in annual bill impacts for different heat pump applications. The total impacts should be shown in a comparison bar chart, with a supporting table with details. At least the following heat pump use cases should be included:

- *As part of a full electrification of all end uses;*
 - *Full electrification of just heating but continued use of gas for other end uses; and*
 - *Partial electrification of heating with a hybrid furnace-heat pump system.”*
- a) What is the factual basis for the claim that “most effective way to inform customers” is as articulated in the above reference? Specifically, please provide what customer focus, survey or other actual evidence of consumer communication preference, understandability or response to advertisements with respect to HVAC services was undertaken to support the above supposition.
 - b) Please compare and contrast the differences between HVAC communications/ advertisements in the United States and Canada, specifically Ontario.

Specifically, Ontario and EGI's service territories cover a wide range of climate (grow) zones. How should the various climate differences in the areas of the Province be included (or not) in EGI communications?

ED-VECC-3

Reference – Neme, page 4

“The average value for the heating months of October through April will be non-trivially lower.”

- a) What are the average value for heating months in each of EGI's existing rate zones? Please provide the last for year and the most recent 3 year average.

ED-VECC-4

Reference – Neme, page 6

“Your total energy bill may go up where electricity is more expensive than natural gas (per equivalent unit of heating after accounting for your realized equipment efficiency), and vice versa” A customer scanning the wording may be drawn to the bolded language about heating bills going up and either not read about the potential for (“or vice versa” language) or assume there is a much lower probability of bills going down. Also, the sentence is not accurate because it excludes consideration of other factors discussed below (e.g., cooling energy savings).

- a) Is the author disputing the statement that a total energy bill may go up if electricity is more expensive than natural gas? Is that not a possibility?

ED-VECC-5

Reference – Neme, page 6

“Enbridge omits the effect of installing a high-performance air source heat pump on cooling energy consumption.”

- a) Please provide a list of the various types of heat pumps (“high performance or otherwise”) that are currently available for installation in all regions of Ontario served by Enbridge.
- b) Is it possible for a consumer to purchase a “non-high performance” heat pump in Ontario? If so, what are the implications of different types of heat pump purchases to the economic comparisons with natural gas?

ED-VECC-6

Reference – Neme, page 6

“Enbridge’s analysis omits the electricity consumption associated with furnace fans. Gas furnaces cannot provide heat to a home without such fans..... eliminating the furnace fan consumption when converting to a heat pump would translate to \$78 per year in energy bill savings that are not included in Enbridge’s analysis..”

- a) What is the percentage of Ontario homes are served by water radiant heat systems?
- b) What additional infrastructure is required for a heat pump to be installed in a home only piped for radiant water heating?
- c) What is the payback period for converting from natural gas radiant water system to exclusive electricity/heat pump?
- d) In the author’s opinion should Enbridge inform consumers as to the various costs of conversions from their existing heating system?

ED-VECC-7

Reference – Neme, page 7

“The Ontario government provides higher electricity price rebates for low-income customers if they have electric heating.4 Depending on income and size of household, the increase ranges from \$204 per year to \$456 per year. Enbridge omits this fact from its comparison..”
<https://ontarioelectricitysupport.ca/faq>

- a) If EGI were to adopt this proposal should they also be required to inform consumers that: *“Most eligible customers need to re-apply every 2 years or whenever their personal circumstances change. For example, eligible customers would need to re-apply if they move or experience a change in income level.”* (op cit).

ED-VECC-8

Reference – Neme, page 9

“Present total heating and cooling energy bills in a simple bar chart, as many customers may find that easier to understand. The chart should show the combined heating and cooling cost of a gas furnace and central air conditioner, as well as for the three heat pump scenarios described in recommendation #2 above. The chart should be followed by appropriate caveats explaining that cost differences will vary based on a variety of factors including current and future energy prices, furnace and heat pump efficiency ratings, the size of the home, insulation levels of the home, etc.

- a) How does the size of home and nature of insulation impact the economic value of conversion from natural gas to electricity/heat pump?

- b) The author argues in the evidence for many details to be included in economic evaluations and communications from EGI. Why are discussions of the impact of the other factors noted in this reference not as (or more) important to include in the analysis? For example, full conversion is premised by the author in a number of places, but homeowners with natural gas heated swimming pools may be less likely to make full conversion (or a conversion more expensive if replacing pool heating system). Likewise, customers may be worse off financially, if a full conversion requires replacement of a natural gas used for other reasons. Should EGI inform natural gas heated pool, natural gas BBQ, natural gas stove/oven, etc. owners of the potential cost implications of making heating source conversions?

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