

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.  
Rebasing Phase 3**

---

**POLLUTION PROBE INTERROGATORIES  
ON  
ENERGY FUTURES GROUP (EFG) EVIDENCE**

---

**May 22, 2026**

**Submitted by: Michael Brophy  
Michael Brophy Consulting Inc.  
Michael.brophy@rogers.com  
Phone: 647-330-1217  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4**

**Consultant for Pollution Probe**

EFG-PP-1

Please explain how total energy use (e.g. heating and cooling) is relevant to providing accurate and complete information to consumers when making a comparison. Please also provide the likely impacts when only a portion of a consumer's energy use (e.g. heating only) is used for natural gas marketing materials.

EFG-PP-2

EFG notes that Enbridge's energy comparison information excludes cost related to natural gas conversion, including the system expansion surcharge. Enbridge has been expanding to new communities that are not economic through project grants funded by a monthly charge to gas ratepayers. A currently planned expansion is requesting a grant of approximately \$44,000 per new customer<sup>1</sup> (for gas infrastructure only, not home upgrades).

- a) Please comments the economics of prudent energy options when significant grant costs for natural gas infrastructure are not included on the cost comparison materials promoting natural gas.
- b) Please provide any recommendations or improvement on how to objectively update Enbridge marketing materials to provide a better comparison on the full cost of modern energy options for consumers not on natural gas.

EFG-PP-3

Enbridge has not yet provided all the updated natural gas marketing materials or reference documents showing the source and calculations used. A Motion is currently being heard by the OEB in this proceeding to require Enbridge to provide the full set of materials, including those updated, but not yet distributed.

- a) How would EFG's approach and recommendations apply to marketing materials not yet updated or provided by Enbridge for review?
- b) Please confirm whether having an objective third party review represents best practice when developing and validating marketing materials such as those to promote natural gas over other options. If not, why not.
- c) What process does EFG recommend that the OEB use when Enbridge makes future updates to natural gas marketing materials including energy or emissions comparisons?

---

<sup>1</sup> EB-2025-0306 Exhibit I.PP-20 and PollutionProbe\_SUB\_correction\_20260521.

EFG-PP-4

Reference: [Guidance on Environmental Claims in Advertising – Ad Standards](#)

The industry guidance on Environmental Claims in Advertising includes a principle to: “Make sure you have up-to-date valid, reliable and relevant scientific evidence to support all claims, both direct and implied. The data should reflect sound scientific principles that would likely be accepted by experts in the field”.

- a) Does EFG agree that this approach represents a reasonable practice that should apply to Enbridge’s natural gas marketing materials? If not, why not.
- b) Please outline the impacts to energy consumers when the above noted practice is not followed, not result in objective, credible and correct assumptions and claim on natural gas marketing materials.
- c) Is EFG aware of other current guidance, requirement or best practices that the OEB should consider for application to natural gas marketing materials.

EFG-PP-5

Please provide any additional recommendations relevant to improving consumer choice based on accurate, objective and credible natural gas marketing materials for consumers considering changing equipment or fuel type.

EFG-PP-6

Enbridge’s natural gas marketing materials including comparative information does not include any information about the energy efficiency incentives available at the time of considering equipment change. This includes Enbridge DSM or IESO Save on Energy (currently jointly delivered in a one-window approach for residential) incentives for those on gas, electricity, wood, propane or oil. Please provide what best practice approach and changes would be required to Enbridge’s marketing materials to bridge this gap.

EFG-PP-7

Reference: Enbridge Gas relies on mass marketing materials and communications to all existing and potential customers, rather than an approach based on targeted marketing (like for new communities being contacted or surveyed) [EB-2025-0306 Exhibit I.PP-24]

Please provide advice on how Enbridge’s approach and marketing materials should be improved to more effectively provide energy efficiency information when other natural gas marketing is done (including for expansion projects).