

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

May 29, 2026

**EB-2026-0009 – Generic Review of the Model Franchise Agreement for Natural Gas
Pollution Probe Comments on Issues List**

Dear Mr. Murray:

Pollution Probe is in receipt of the Ontario Energy Board's (OEB's) request for feedback on the Issues List for the above-noted proceeding. The following are Pollution Probe's comments which attempt to avoid duplication of those already provided.

It is important to ensure that the Model Franchise Agreement is "fit for purpose" to enable common elements to be considered in a generic manner, while providing the flexibility to apply appropriately to the situation for each individual municipality. Failure to do so could be a barrier to serving the public interest, individually and as an aggregated whole.

The OEB noted in Procedural Order No. 1 that elements of the Model Franchise Agreement have emerged over time and through multiple proceedings as areas of concern. This proceeding is to provide a forum for the discussion and consideration of those issues related to the Model Franchise Agreement. Given the importance and timing of such a review, Pollution Probe recommends that the OEB apply its typical broad interpretation of each final issue in order to avoid narrow exclusion of important and relevant consideration of information and options related to the Model Franchise Agreement. Although this is a typical approach for the OEB, noting so when the final Issues List is issued, could be helpful to all parties.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: All Parties (via email)



130 Queens Quay East, Suite 902
Toronto, Ontario M5A 0P6
T 416.926.1907 F 416.926.1601
www.pollutionprobe.org

Richard Carlson, Pollution Probe (via email)