

EGI Reply-PP-1

Reference: In Enbridge Gas's view, the issue before the OEB is not whether customer-facing communications should be prescribed on a line-by-line basis, but whether the disclosure, viewed as a whole and in context, is reasonable, fit for purpose, and not objectively misleading. [Exhibit O, paragraph 3]

- a) Please provide all relevant OEB direction wording that Enbridge has used to interpret the scope in the manner outlined above.
- b) Please explain why Enbridge has not explicitly included "customer choice" as informed by objective information, as a key factor in reviewing the marketing materials.
- c) If Enbridge considers the issues before the OEB in this proceeding to consider communication materials to be "viewed as a whole", please explain why Enbridge has declined to provide the whole (i.e. complete) set of materials requested.
- d) Please define the "purpose" (i.e. fit for "purpose") that Enbridge refers to and provide all documentation or internal communications that Enbridge has related to the purpose of the materials promoting natural gas compared to alternatives.
- e) Please provide any materials (including all third party reviews) available that Enbridge used to validate that the marketing materials are "reasonable". If no third-party review process was applied by Enbridge to review materials for reasonableness, please explain why not.
- f) Please define the term "objectively misleading", as used in Enbridge's statement above. If it is from a third party source, please share the source information.
- g) Please provide any materials (including third party review) available that Enbridge used to validate that the marketing materials are not "objectively misleading".
- h) Please confirm that the information related to the marketing materials is required in order to view those materials in whole and in context, ensure that they are reasonable, fit for purpose, and not objectively misleading. If not correct, please provide how this assessment can be conducted in this proceeding without having the whole set of materials and assumptions available.

EGI Reply-PP-2

Please confirm that the Energy Futures Group (EFG) review is the first third-party review of marketing materials since they were reviewed and updated by Enbridge, following the Phase 2 settlement agreement and related OEB Decision to suspend use of the previously used marketing materials. If not correct, please provide a copy of all other third-party analysis, reviews and recommendations.

EGI Reply-PP-3

Reference: At the time of drafting this evidence, fewer than 1500 emails have been sent containing the HRS program disclaimer and three customers have received the System Pruning IRP Pilot Project disclaimer. [Exhibit O, paragraph 7]

- a) Is the purpose of the Reply Evidence information noted above to outline the limited use and impact of the of the HRS emails and IRP disclaimer? If not, please explain the purpose of highlighting the limited use of the emails and disclaimers created by Enbridge.
- b) For the 1500 HRS customer emails and 3 IRP disclaimers sent to customers, please provide the outcomes of customer choices that used this information sent by Enbridge (e.g. did any of these customer choose not to continue with the electric option).

EGI Reply-PP-4

Enbridge highlights the limited shelf life of some assumptions and calculations for savings. Please explain what Enbridge's opinion is on the optimal frequency to review (and update if required) cost and savings assumptions. If there are references that Enbridge's optimal approach is based on, please provide the documents or links.

EGI Reply-PP-5

The Reply Evidence provided by Enbridge appears to include information that would typically be included in Argument and not new evidence provided by an expert. Please comment on this observation and if this was intended to represent any new evidence (particularly if it was developed by a qualified expert), please provide a summary of those references and which expert developed them (if applicable).

EGI Reply-PP-6

Reference: The HRS disclaimer is high-level, illustrative, and provides general guidance rather than a prediction of customer-specific outcomes to natural gas consumers expressing interest in installing a heat pump. The HRS disclaimer is one of the many heat pump cost comparisons that exist in the public sphere that may be accessed by consumers. Each comparison relies on different assumptions, which may or may not be accepted by all parties. [Exhibit O, paragraph 8]

- a) Please explain the difference in impact and value between including general guidance on program materials based on high-level illustrative information vs. using more specific and detailed factual information.
- b) If consumers have access to a broad range of objective information already in the public sphere, what is the incremental value and purpose of including a high-level, illustrative statement, which may or may not be accepted by all parties?
- c) Please confirm that using the approach noted above is a new approach for Enbridge. If similar guidance statements or disclaimer for non-gas alternative were used previously, please provide a copy of those statements/disclaimers and where/when they were used.