

EB-2025-0064
Enbridge Gas Rebasing – Phase III

Interrogatories of Environmental Defence on Enbridge’s Exhibit O

Interrogatory # O-ED-19

Reference: Exhibit O, p. 3

Preamble: Enbridge states as follows at page 3:

An example of a heat pump cost comparison that has similar disclaimers and direction to consumers to consult with HVAC professionals as the HRS disclaimer is the one hosted by Toronto Hydro.¹ This is notable because it is a clear indication by an entity promoting heat pump adoption that the comparison should not be relied upon in place of an estimate provided by an industry professional for that consumer’s specific circumstance.

Question(s):

- (a) Please file a copy of the website referenced, including the “output” page for a sample price comparison lookup (for Toronto, without a heat pump, detached, 2,000 sq ft, pre-1950s, gas furnace as current heating, central air for current cooling, existing HVAC 15-20 years old (i.e. time of replacement), not applicable/not sure for the remaining entries).

Interrogatory # O-ED-20

Reference: Exhibit O, p. 7

Preamble: Enbridge states as follows at page 7:

In addition, the EFG evidence did not discuss that, to the extent a heat pump relies upon a defrost cycle to remove any ice build-up on the outdoor unit, its electricity consumption will increase.

Question(s):

- (a) Do the figures used in the Technical Resource Manual for calculating the cost-effectiveness of heat pumps account for the above-referenced electricity consumption (e.g. via the heat pump efficiency rating)?

Interrogatory # O-ED-21

¹ <https://www.torontohydro.com/for-home/savings-sustainability/electric-heat-pumps/heat-pump-calculator>

Reference: Exhibit O

Preamble: Enbridge states as follows at page 7:

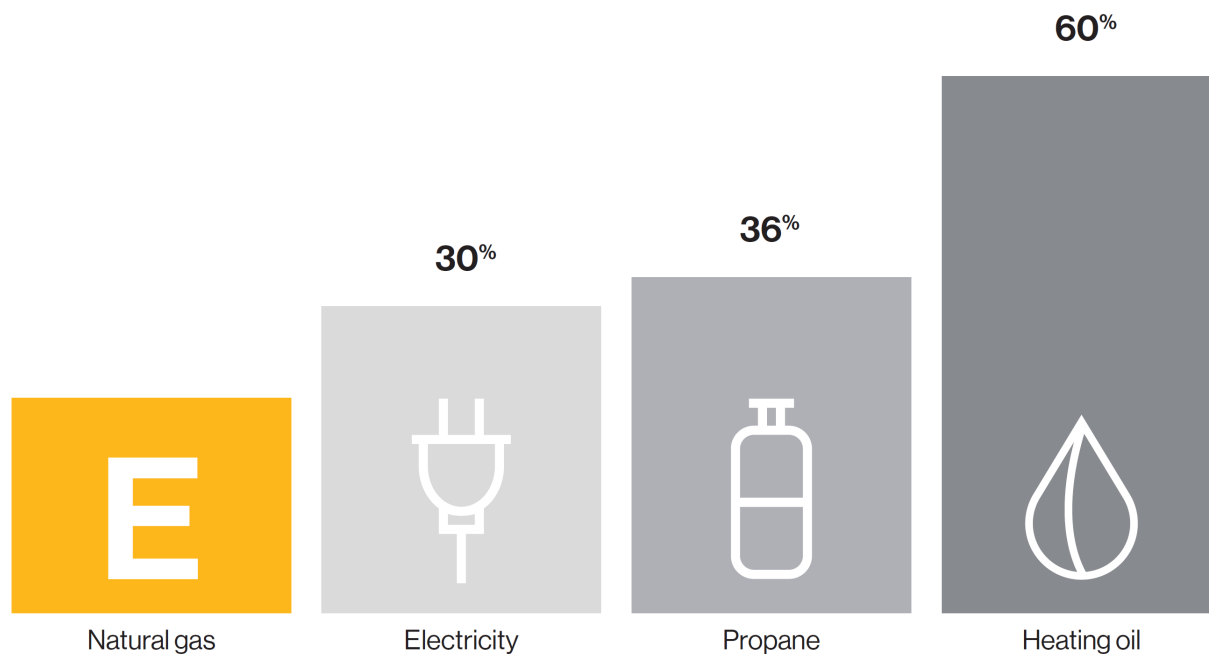
Question(s):

- (a) Please state the name and titles of the Enbridge staff involved in creating Exhibit O, and a brief description of their role (e.g. original drafting, reviewing, or approving). Please provide the CVs of each.

Interrogatory # O-ED-22

Reference: Exhibit O

Preamble: The following bar chart was used by Enbridge to promote connections in gas expansion communities under the heading “How much can you save each year?”²



Question(s):

- (a) When does Enbridge plan to release updated cost comparison materials for gas expansion projects? Please provide the latest draft of any such cost comparison materials, even if it has not been released yet.
- (b) Please provide a version of the above-noted bar chart with a bar added for space and water heating via a heat pump. Please prepare this using energy prices for the latest gas expansion community as a sample. For the heat pump bar, please calculate the costs and benefits consistent with all of the cost and benefit categories and figures applicable to

² EB-2024-0111, Phase 2 Exhibit 1, Tab 16, Schedule 1, Attachment 1, Page 12

heat pumps in the latest DSM Technical Resource Manual (TRM). Consistent with the DSM TRM, please account for cooling costs in the bar chart. Please provide all underlying calculations.

- (c) Please provide a version of the above-noted bar chart with a column added for space heating a heat pump. Please prepare this using energy prices for the latest gas expansion community as a sample. For the heat pump bar, please calculate the costs and benefits consistent with all of the cost and benefit categories and figures applicable to heat pumps in the latest DSM Technical Resource Manual (TRM). Consistent with the DSM TRM, please account for cooling costs in the bar chart. Please provide all underlying calculations.