



Robin Stevenson
Technical Manager
Strategic Applications – Rate
Rebasing

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Enbridge Gas Inc.
50 Keil Drive N.
Chatham ON, N7M 5M1

June 19, 2026

VIA RESS AND EMAIL

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)
EB-2025-0064 –2024 Rebasing Phase 3 – Interrogatory Responses on
Reply Evidence**

In accordance with Procedural Order No. 5 issued by the Ontario Energy Board (OEB) on April 21, 2026, please find enclosed Enbridge Gas's responses to interrogatories on its reply evidence in the above-noted proceeding.

These responses are provided in relation to interrogatories filed by OEB staff and intervenors on June 12, 2026.

This material has been filed through the OEB's RESS system and has been sent to all parties in this proceeding.

Sincerely,

Robin Stevenson

Robin Stevenson
Technical Manager, Strategic Applications – Rate Rebasing

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

EB-2025-0295 (2027-2030 Natural Gas Demand Side Management Plan), OEB Staff Interrogatory E-Staff-51

Preamble:

As Enbridge Gas's customer-facing heating cost comparison materials are now used primarily in Enbridge Gas's demand-side management (DSM) programming through the Home Renovation Savings Program, OEB staff filed the questions below in the active Enbridge Gas 2027-2030 Natural Gas Demand Side Management Plan proceeding. For completeness of the record, please file Enbridge Gas's responses to these questions in the phase 3 rebasing proceeding as well.

Question(s):

- a) Please describe whether Enbridge Gas has reviewed the ED-GEC Phase 3 rebasing evidence and, if so, what specific changes (if any) have been implemented or are being considered to its customer-facing heating cost comparison materials in response. If no changes are being considered, state why and whether Enbridge Gas intends to consider in the future for its 2027-2030 DSM program delivery.
- b) Please explain, at a high level, what changes Enbridge Gas will make (if any) to ensure the comparator reflects total annual bill impacts and addresses the key elements identified in the ED-GEC Phase 3 Rebasing Intervenor Evidence (fixed gas charges where relevant; cooling savings; furnace fan electricity; low-income rebates; surcharge areas), including whether Enbridge Gas will present results annually and by scenario (full electrification; heating-only electrification; hybrid).
- c) Please provide an illustrative revised heating/cooling bill comparison that reflects Enbridge Gas's proposed approach for 2027–2030, including:
 - A clear presentation of annual heating and cooling bill impacts for at least the following scenarios (consistent with Ref 3 recommendations):
 - i. full electrification of all end uses (i.e., eliminating gas fixed charges);
 - ii. electrify heating only while retaining gas for other end uses;
 - iii. hybrid (heat pump + gas back-up).

- A breakdown of the components included in the comparison (e.g., gas variable heating charges; electricity heating charges; electricity cooling charges; fixed gas charges where applicable; furnace fan electricity where applicable; rebates/credits where applicable; surcharge effects where applicable), with clear notes on assumptions and data sources. Please provide the comparison in MS Excel with formulas intact.

Response:

a-c) The response filed by Enbridge Gas to the noted interrogatory in the EB-2025-0295 proceeding is attached. The Company does not plan to update its disclaimer to address items suggested in the EFG Evidence, for the reasons set out in Enbridge Gas's Reply Evidence at Exhibit O.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

Exhibit E / Tab 2 / Schedule 1; Ref 2: EB-2025-0064 (EGI Rebasing Phase 3), Enbridge Gas responses to Environmental Defence/GEC information request, May 1, 2026; Ref 3: EB-2025-0064 (EGI Rebasing Phase 3), ED-GEC Intervenor Evidence, Review of Enbridge Heating Cost Comparison, Energy Futures Group, May 15, 2026
Issue 5, Issue 7, Issue 13

Preamble:

In Enbridge Gas's Phase 3 rebasing proceeding, Enbridge Gas provides customer-facing heating cost comparison materials used in its Home Renovation Savings program and IRP pilots, and intervenor evidence filed by Environmental Defence and the Green Energy Coalition in this proceeding includes a report by Chris Neme that reviews Enbridge Gas's customer-facing heating cost comparison materials.

Question(s):

- a) Please describe whether Enbridge Gas has reviewed the ED-GEC Phase 3 rebasing evidence and, if so, what specific changes (if any) have been implemented or are being considered to its customer-facing heating cost comparison materials in response. If no changes are being considered, state why and whether Enbridge Gas intends to consider in the future for its 2027-2030 DSM program delivery.
- b) Please explain, at a high level, what changes Enbridge Gas will make (if any) to ensure the comparator reflects total annual bill impacts and addresses the key elements identified in the ED-GEC Phase 3 Rebasing Intervenor Evidence (fixed gas charges where relevant; cooling savings; furnace fan electricity; low-income rebates; surcharge areas), including whether Enbridge Gas will present results annually and by scenario (full electrification; heating-only electrification; hybrid).
- c) Please provide an illustrative revised heating/cooling bill comparison that reflects Enbridge Gas's proposed approach for 2027–2030, including:

- A clear presentation of annual heating and cooling bill impacts for at least the following scenarios (consistent with Ref 3 recommendations):
 - i. full electrification of all end uses (i.e., eliminating gas fixed charges);
 - ii. electrify heating only while retaining gas for other end uses;
 - iii. hybrid (heat pump + gas back-up).
- A breakdown of the components included in the comparison (e.g., gas variable heating charges; electricity heating charges; electricity cooling charges; fixed gas charges where applicable; furnace fan electricity where applicable; rebates/credits where applicable; surcharge effects where applicable), with clear notes on assumptions and data sources.
- Please provide the comparison in MS Excel with formulas intact.

Response:

a - c) Enbridge Gas objects to this interrogatory. Questions a) through c) ask Enbridge Gas to review, respond to, or discuss the implementation of potential changes based on intervenor evidence filed by ED/GEC in the Rebasing Phase 3 proceeding (EB-2025-0064). That evidence is part of a separate active OEB proceeding in which procedural steps (including reply evidence) are ongoing. The OEB has not rendered any findings or direction on the weight or merit of that evidence.

As such, this interrogatory is outside the scope of this DSM Plan Application. Further, it would be inappropriate and inconsistent with the regulatory efficiency objectives reflected in the OEB's 10-Point Action Plan to require Enbridge Gas to address, in this proceeding, evidence arising in a different case – whether by describing the Company's review of the evidence or producing new analysis related to the implementation of its recommendations.

For the purposes of providing OEB staff (and other parties) with greater clarity in this DSM Plan proceeding, Enbridge Gas confirms the following:

- The ED/GEC Phase 3 Rebasing evidence has not resulted in any changes to the proposed 2027-2030 DSM Plan Application, including the Heat Pump Offering or the DSM cost-effectiveness analysis filed in this case.
- The customer-facing materials referenced in this interrogatory (at Exhibit E, Tab 2, Schedule 1, Attachment 1) are targeted disclaimers in the context of a specific HRS offering. They serve a discrete consumer information function, namely to

alert customers interested in HRS heat pump offerings that heat pump economics vary by customer circumstances, including energy prices, usage, equipment, and weather. The disclaimers are *not* DSM planning tools, cost-effectiveness models, or bill impact forecasts.

- Enbridge Gas has not proposed to redesign these materials into an annual bill comparison tool or to present scenario-basis analyses as part of the 2027-2030 DSM Plan.

To the extent the OEB provides relevant direction arising from EB-2025-0064, Enbridge Gas will consider its applicability to DSM programming at the appropriate time.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

Exhibit O, Pages 5-7

Preamble:

Enbridge Gas describes the differences in the consumer disclaimers between the Home Renovation Savings disclaimer and the disclaimers for the two IRP pilot projects. Enbridge Gas also states that it has no reason to assume that customers who adopt a heat pump are on a path to fully electrifying their home and it would be inappropriate to include the fixed costs in the comparison presented in the Home Renovation Savings consumer disclaimer.

Question(s):

- a) Given that the IRP pilot projects do not allow back up natural gas space heating (and in the case of the system pruning pilot project require full disconnection from the natural gas system), does Enbridge Gas agree that its statement that it has no reason to assume that customers who adopt a heat pump are on a path to fully electrifying their home is not applicable to the IRP pilot projects?
- b) Please confirm that the cost comparisons/consumer disclaimers for the IRP pilot projects did/do not include any information on the reduction in natural gas fixed monthly charges that would result from disconnection from the natural gas system.
- c) If confirmed, please describe why Enbridge Gas determined not to include this information in the IRP pilot project cost comparisons/consumer disclaimers.

Response:

- a) Enbridge Gas agrees this statement is not applicable to the System Pruning Pilot Project but does not agree for the Southern Lake Huron Pilot Project.
- b-c) Not Confirmed. The disclaimers for the IRP pilot projects clearly state that fixed monthly charges for natural gas are not included in the comparison chart.

For the Southern Lake Huron Pilot Project see response to part a). There is no requirement for customers to disconnect their natural gas service. Of the ten homeowners who have participated in the cold climate air source heat pump offer to date, only one property no longer has an active Enbridge Gas account.

For the System Pruning Pilot Project as stated in Reply Evidence Exhibit O, page 6, the disclaimer clearly states the homeowner will no longer receive a natural gas bill following disconnection.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

Exhibit O, Page 6

Preamble:

Enbridge Gas notes that the cost comparisons/consumer disclaimers for the IRP pilot projects include information on the monthly home heating energy costs of electric resistance heating with an associated description.

Question(s):

- a) Please provide the wording of this associated description regarding the use of electric resistance heating.
- b) Is any numerical estimate of how often the electric resistance heating would run (and the associated cost) provided? If so, please describe the assumptions that were used for this estimate.

Response:

- a) Please see Response to ED Question, Attachment 1, page 11 and 17 "Electric Heat Pump System Settings" section, filed May 1, 2026.
- b) No. Response to ED Question, Attachment 2, filed May 1, 2026, provides the calculation for the cost comparison information.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

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):

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).

Response:

Enbridge Gas's evidence simply pointed out that Toronto Hydro also uses a disclaimer on their cost comparison calculator, which is similar to Enbridge Gas's disclaimer as it indicates the calculator should not be relied upon in place of an estimate provided by an industry professional for that consumer's specific circumstance.

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

Enbridge Gas disputes that the results that might be produced using one scenario on the Toronto Hydro cost comparison calculator are relevant to Issue 13(d) and the review of Enbridge Gas's compliance with prior commitments related to marketing materials.

There is no way to understand or interpret the results from the Toronto Hydro cost comparison calculator because the Toronto Hydro website does not provide any information as to the assumptions and inputs used for their calculations. The disclaimer included in the Toronto Hydro cost calculator results indicates that: *"[t]hese findings are based on the best information available at the time this tool was developed"* and

these results are based on the assumptions provided regarding the evolution of future rates (including, but not limited to, electricity, natural gas and carbon pricing), as well as heat pump sizing and control strategies, among other factors. If rates evolve differently than expected, or different sizing or control strategies are selected, costs and savings may vary.

It is not clear, therefore, what assumptions are used – for example, it is not known whether the consumer carbon levy is included (though this is implied by the mention of "carbon pricing"). A different page on the Toronto Hydro website related to heat pumps indicates that the information being provided (related to heat pump costs) dates to 2023.² It is also not known what assumptions are used by Toronto Hydro as to whether a customer would disconnect from gas. As set out in Enbridge Gas's Reply Evidence, the Company's experience is that the vast majority of customers who install electric heat pumps retain gas service.

Without agreeing that the results from the single scenario provided by ED are relevant to Issue 13(d), or that any conclusions can be drawn from a third-party calculator that provides no details as to its inputs and calculations, Enbridge Gas has run the requested scenario and provides the result at Attachment 1. Included within Attachment 1 is the full text of the disclaimer used by Toronto Hydro, including the statement that:

Calculations provided through this tool are approximate and should be considered as estimates only and should not be relied upon in lieu of an estimate by a heating and cooling professional. Toronto Hydro disclaims any and all representations, warranties, and conditions with respect to the calculations, including any conditions of accuracy, sufficiency, or suitability. The actual energy costs and savings may vary by +/- 50% based on factors such as your home's age, size, insulation level, thermostat settings and any supplementary heating sources. For more accurate estimates, please contact a heating and cooling professional.

² [Electric heat pumps - Toronto Hydro](#).



FOR HOME | SAVINGS & SUSTAINABILITY

Heat pump calculator

Calculate how much you could save on your home heating and cooling costs by switching to a heat pump.

This calculator is for residential customers who live in a house.

Do you live in a house or an apartment/condominium?

House

Do you currently use a heat pump?

No

What type of house do you live in?

Detached

How many square feet (sq ft) is your house?

1,000-2,500 sq ft

What is the age of your house?

Pre-1950

What is your household income? (optional)

Select

What type of heating system do you currently have?

Gas furnace

What type of cooling system do you currently have?

Central air

What is your estimated annual natural gas cost? (optional)

Select



What is your estimated annual natural gas usage? (optional)

Select



How old is your current heating, ventilation, and air conditioning (HVAC) system? (optional)

15-20 years



When are you planning on replacing your HVAC system?

I'm not sure



What would be the main reason(s) for replacing your heating system? Please rank in the order of importance, with 1 being the most important reason, and 5 being the least important reason

End-of-life replacement

1



Financial savings

4



Reducing emissions

3



Improving health and air quality

5



Dual function of heat pumps (heating and cooling)

2



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FOR HOME | SAVINGS & SUSTAINABILITY

Heat pump calculator

Calculate how much you could save on your home heating and cooling costs by switching to a heat pump.

This calculator is for residential customers who live in a house.

Based on the information you provided, we're sharing an estimate of the savings you could achieve by switching to a heat pump. Please note: The electricity cost estimate refers to changes in electricity cost only. The total energy cost estimate refers to changes for both electricity and natural gas costs. Both of these are annual estimates. When reading the values, please note that a positive (+) value indicates an increase in cost while a negative (-) value indicates savings or a decrease in cost.

Cost savings estimate table

Greenhouse gas (GHG) reduction estimate (annual) Greenhouse Gas Equivalencies Calculator	7.00 tCO ₂ e
Electricity cost estimate (annual)	\$1,640.00
Upfront cost estimate	\$16,000.00
Annual energy cost estimate (this is a net sum of new electricity cost and/or new natural gas cost, after the heat pump installation)	-\$800.00

Summary of answers provided

Disclaimer: Calculations provided through this tool are approximate and should be considered as estimates only and should not be relied upon in lieu of an estimate by a heating and cooling professional. Toronto Hydro disclaims any and all representations, warranties, and conditions with respect to the calculations, including any conditions of accuracy, sufficiency, or suitability. The actual energy costs and savings may vary by +/- 50% based on factors such your home's age, size, insulation level, thermostat settings and any supplementary heating sources. For more accurate estimates, please contact a heating and cooling professional.

Costs assume end of life of equipment. Note that this tool only considers air source heat pumps. If you are interested in ground source heat pumps, please consult our list of contractors to determine if this technology is more suited for your home.

By using this tool, you acknowledge and agree that Toronto Hydro may collect and store any data submitted on this tool to deliver, analyze, support, and improve its advisory services to you and other customers. The data you submit via this tool may be used by Toronto Hydro to conduct certain analytical research, performance tracking, or other advisory services. You further acknowledge and agree that we may further publish summary or aggregate results relating to metrics comprised of research data, from time to time, and distribute or license such anonymous, aggregated research data for any purpose. Toronto Hydro will not collect any personal information from you through this tool, nor will it share any personal information with any third parties except in accordance with Toronto Hydro's Privacy Policy.

Neither Toronto Hydro, nor its affiliates or Representatives, shall be liable for any loss, damage, or claims arising directly or indirectly from your use of the calculations or any other outputs provided by this tool, and you hereby waive any claims to which you may become entitled for loss or damage and release Toronto Hydro and its Representatives from any and all such claims. For greater clarity, 'Representatives'

includes any directors, officers, employees, agents, or contractors of Toronto Hydro or its affiliates. These findings are based on the best information available at the time this tool was developed. The results provided reflect typical costs and savings for representative building archetypes, and may vary depending on your home's actual floor area, heating and cooling demands, and other factors that impact the costs of electrification, such as your home's electrical panel amperage. This information is for educational purposes only, and it is recommended to get a quote for your home prior to purchase and installation of any heat pump.

Further, these results are based on the assumptions provided regarding the evolution of future rates (including, but not limited to, electricity, natural gas and carbon pricing), as well as heat pump sizing and control strategies, among other factors. If rates evolve differently than expected, or different sizing or control strategies are selected, costs and savings may vary.

It should also be noted that these costs **do not include incentives**, which may further help to reduce the upfront cost of heat pumps. [Show less](#)

Go back to the calculator

Learn more about heat pumps

Email results

Related content

Electric heat pumps

How they work and could benefit you

[LEARN MORE](#) ►

Climate action

Resources to help you take climate action

[GET STARTED](#) ►

Electric heat pumps guide

A guide for buying and installing an electric heat pump

[GET THE GUIDE](#) ►

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

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):

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)?

Response:

The Technical Resource Manual (TRM) is a DSM program administration tool used for regulatory savings estimation and evaluation. The TRM includes standardized assumptions related to operating conditions, but those assumptions are developed for DSM savings calculations, not customer-facing communications with illustrative energy cost impacts.

Accordingly, the TRM may be suitable, at most, as a technical cross-check within a modelling context rather than a tool for determining how information should be presented to customers. Enbridge Gas did not use the TRM to develop the HRS disclaimer because it is not suited to communicating illustrative energy cost impact information to customers.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Reference:

Exhibit O

Preamble:

Enbridge states as follows at page 7:

Question(s):

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.

Response:

Please find attached the CVs of the Enbridge Gas witnesses for Exhibit O. The Reply Evidence was reviewed by the Enbridge Gas regulatory and legal teams before it was submitted.

CURRICULUM VITAE OF
ALISON MOORE

Experience: Enbridge Gas Inc.

 Manager, Integrated Resource Planning, 2024

 Supervisor, Integrated Resource Planning, 2024

 Supervisor, Energy Solutions, 2022

 Supervisor, Residential Energy Conservation, 2019

Union Gas Ltd.

 Manager, Residential Marketing, 2015

 Manager, DSM Strategy, 2013

 DSM Strategy Manager, 2010

 DSM Policy Coordinator, 2008

 Distribution Marketing Analyst, 2007

Education: Bachelor of Science, Honours Science and Business

 University of Waterloo, 2007

Appearances: (Ontario Energy Board)

 EB-2021-0002

CURRICULUM VITAE OF
M. CRAIG FERNANDES

Experience: Enbridge Gas Inc.

Manager, Residential Energy Conservation
2024

Enbridge Gas Distribution Inc.

Manager, Strategy and Policy Energy Conservation
2018

Senior Manager, Business Development Strategy
2014

Senior Manager, Regulatory, GTA Project
2013

Manager, Regulatory Project Development
2011

Senior Project Manager, Major Reinforcements
2010

Manager, Operations Projects
2009

Senior Project Manager, Operations Solutions
2006

Program Manager, Energy Technology
2005

Celestica Inc.

Global Pricing Advisor
2003

Senior Regional Cost Engineer
2002

Financial Cost Engineer
2000

Manufacturing Engineering Team Leader
1999

Senior Associate Prototype Engineer
1997

Carrier Canada Ltd.

Automation Controls Specialist
1995

Customer Service Representative
1994

Education: Bachelor of Applied Science, Mechanical Engineering,
University of Waterloo (1993)

Masters of Business Administration
University of Toronto (1999)

Memberships: Association of Professional Engineers Ontario

Appearances: (Ontario Energy Board)

EB-2011-0354
EB-2012-0451
EB-2014-0323
EB-2017-0127
EB-2021-0002
EB-2024-0198

CURRICULUM VITAE OF
Cody Wood

Experience: Enbridge Gas Inc.

Supervisor, Energy Policy & Planning
2025

Supervisor, Energy Transition Planning
2024

Specialist II Energy Transition, Carbon and Energy Transition
Planning
2023

Specialist Energy Transition, Carbon and Energy Transition
Planning
2021

Sr. Advisor Long Range Planning, Distribution Optimization
Engineering
2020

Advisor Long Range Planning, Distribution Optimization
Engineering
2019

Enbridge Gas Distribution Inc

Advisor Long Range Planning, Distribution Planning
2016

Advisor Network Planning, Distribution Planning
2013

Sr Analyst, Planning and Design
2011

Education: Master of Applied Science, Chemical Engineering
University of Toronto (2011)

Bachelor of Applied Science, Chemical Engineering
University of Toronto (2009)

Memberships: P.Eng – Professional Engineers Ontario

Appearances: (Ontario Energy Board)

EB-2022-0200

EB-2024-0200

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

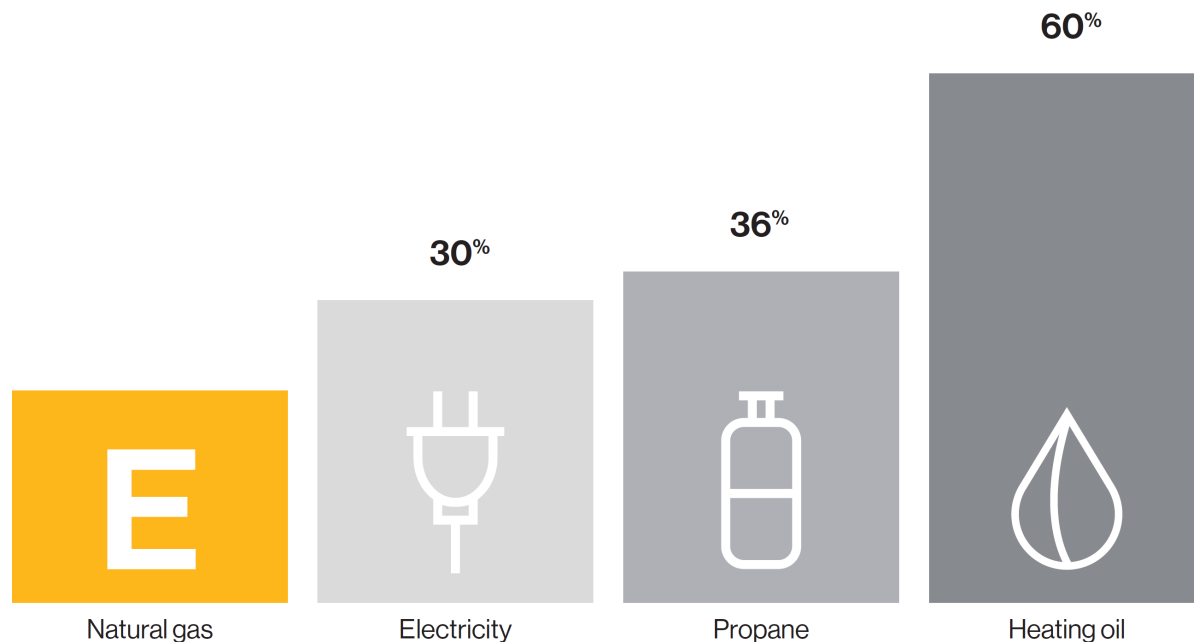
Interrogatory

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?”¹



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

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

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 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.

Response:

- a-c) Enbridge Gas has no current plans to release updated cost comparison materials for gas expansion projects. Enbridge Gas declines to provide the balance of the information requested as it is not relevant to the OEB's review of Issue 13(d).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

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]

Question(s):

- 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.

Response:

- a) As stated in Enbridge Gas's response to the Pollution Probe motion, Enbridge Gas has interpreted the scope of Issue 13(d) based on the OEB-approved Phase 3 Issues List and the OEB direction and settlement wording that gave rise to the issue in Phase 1 and Phase 2. Issue 13 asks whether Enbridge Gas has identified and responded appropriately to all relevant OEB directions and Enbridge Gas commitments made in OEB proceedings, including Issue 13(d): "filing updated written marketing materials or reference materials aimed at customers, potential customers, HVAC contractors or builders that include or previously included energy comparison information."
- b) Enbridge Gas does not agree that "customer choice" was excluded from its review. The purpose of the customer-facing disclaimer information is to support informed consumer choice by providing general, illustrative information about the potential relationship between energy use and customer energy bills in the context of heat pump adoption, while advising customers that outcomes will vary and that they should consider their own circumstances and work with their HVAC contractor.
- c) Enbridge Gas does not agree that it has declined to provide the relevant materials required for the OEB's assessment of Issue 13(d). Enbridge Gas filed updated written marketing and reference materials that previously contained energy comparison information at Phase 3 Exhibit 1, Tab 16, Schedule 1, Attachment 1. Enbridge Gas also provided the relevant disclaimer information used in the HRS Program and IRP Pilot Projects in this proceeding and in related filings. Enbridge Gas has confirmed that, other than the disclaimer information being used for specific purposes, it is no longer using marketing materials with cost comparisons. In Enbridge Gas's view, it is not necessary, proportionate or consistent with the objective of regulatory efficiency to file each and every instance of materials that do not contain cost comparisons, where the relevant energy comparison information, statements on savings and disclaimer materials have been provided.
- d) The "purpose" referenced by Enbridge Gas is the targeted and specific function the customer-facing disclaimer is intended to serve within its program context.

The purpose of the HRS disclaimer is properly understood within the broader structure of program communications, which are delivered through different channels, at different stages of the customer journey, and for different purposes.

The disclaimer is not a general-purpose mass-market communication or a customer's first point of information. Instead, it is provided to those customers who have already progressed through earlier engagement stages. For the early awareness stage, communications are directed to a large audience, reaching hundreds of thousands of customers, and focus on promoting rebates, energy savings, and participation, without including energy cost or bill impact context. Once a customer is at the evaluation stage, program-specific materials are provided via the website and reach a larger volume of customer interactions, including millions of website sessions, and provide detailed program information and guidance, but similarly do not include energy cost or bill impact context. The HRS heat pump disclaimer is provided at the decision stage to far fewer customers, numbering in the thousands, who are actively considering participation for a heat pump, and introduces high-level, illustrative energy cost and bill impact context only at the decision point in the customer journey. Given this context, providing this information at the point of customer decision is appropriate and necessary to support informed customer choice. Absent this type of disclosure, customers could be left with an incomplete understanding of potential cost implications.

Within that context, by providing an illustrative comparison and related assumptions, the purpose of the disclaimer is to support informed customer choice based on how heating costs may differ across technologies under stated assumptions.

Specifically, the disclaimer states:

Key Facts

- Natural gas and electricity have different costs per unit of energy. As of January 2026, electricity costs are more than 4 times higher per energy unit than natural gas, however heat pumps are more efficient than gas furnaces.
- Heat pumps can reduce overall energy use and GHG emissions compared to traditional furnaces, but may result in higher energy bills depending on rates, realized equipment efficiency and usage.
- Hybrid heating systems combine a gas furnace and heat pump, reducing energy consumption but with home-specific impacts to overall running costs.
- Your choice should reflect your household needs, budget, and environmental priorities.

What Should You Do?

- Consult your HVAC contractor to determine which system is right for your home.
- Ask about system settings (especially switchover temperature for hybrid systems) and how they affect your energy consumption, bills, and GHG emissions.
- Review current utility rates and rebates to understand your potential costs.

“Fit for purpose” refers to whether the communication can reasonably fulfill its intended informational objective when viewed as a whole and in the context in which it is encountered by the target audience. This does not require that the disclaimer itself includes all possible inputs, scenarios, or analytical detail, but rather that it provide appropriate, high-level context to support the customer’s consideration at the relevant stage of the customer journey.

Beyond the evidence filed in this proceeding, the Company has not relied on separate formal documentation or internal policy statements that define “purpose” differently from that described above.

- e) Enbridge Gas’s marketing and reference materials, including the updates made, were reviewed by Enbridge Gas’s Legal and Regulatory teams to ensure alignment with the Phase 2 Settlement Agreement. No third-party peer review was completed. Enbridge Gas’s standard practice is to review these materials internally.
- f) Enbridge Gas used the phrase “not objectively misleading” in its ordinary meaning and not as a defined term from a third-party source. In this context, Enbridge Gas means that the relevant customer-facing disclaimer, when read as a whole and in context by the intended audience, does not present the illustrative comparison or related assumptions in a way that would reasonably be expected to mislead customers about the nature, purpose, limitations, or scope of the information. The assessment is not whether another party would have preferred different wording, assumptions, or additional scenarios, but whether the disclaimer is reasonable, fit for

its customer-facing purpose, and not misleading when considered as a whole and in context.

- g) Please see the response to part e). Enbridge Gas has not relied on a third-party review to validate that the materials are not objectively misleading. Enbridge Gas reviewed the materials internally, including through Legal and Regulatory review, for alignment with the applicable OEB direction and Phase 2 Settlement Agreement. Enbridge Gas also filed Reply Evidence at Exhibit O explaining why it does not agree with EFG's observations and why the disclaimer remains appropriate when considered in light of its purpose, scope, intended audience, illustrative nature, and the need for a high-level consumer communication to remain proportionate, broadly applicable, and understandable.
- h) Not confirmed. Enbridge Gas does not agree that the OEB requires every instance of marketing material beyond the materials filed, in order to assess Issue 13(d). The relevant assessment can be conducted based on the filed evidence, including the updated materials filed at Phase 3 Exhibit 1, Tab 16, Schedule 1, Attachment 1; the associated interrogatory responses; the disclaimer information filed in this proceeding and related proceedings; and Enbridge Gas's Reply Evidence at Exhibit O. These materials provide the OEB with the relevant disclaimer, context, purpose, and assumptions needed to assess whether Enbridge Gas has responded appropriately to the applicable OEB directions and commitments.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Question(s):

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.

Response:

Enbridge Gas has not commissioned any third-party review of its disclaimer or any marketing materials since the Phase 2 Settlement Proposal. The materials filed in this proceeding are available for all parties to review. To Enbridge Gas's knowledge, the EFG evidence is the only formal written review.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

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]

Question(s):

- 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).

Response:

- a) The purpose of identifying the number of communications (i.e., fewer than 1,500 HRS emails and three IRP disclaimers) is to provide context on the scope and nature of the customer-facing communications at issue in this proceeding.

In particular, including this information makes clear that these communications are targeted, program-specific disclosures provided to a defined group of customers, and are not broad-based or generalized materials. The limited and targeted use underscores that the disclaimer is a program-specific informational disclosure provided at the point of customer engagement, not a mass communication or promotional campaign.

- b) With respect to the HRS program, Enbridge Gas does not track or maintain customer decision-making outcomes in the manner requested. As a result, it is not possible to attribute individual customer choices to the receipt of the disclaimer.

The three System Pruning IRP Pilot Project candidates who proceeded to the step of receiving the disclaimer remain in progress. They are not yet at the decision point of confirming whether they will participate in the pilot.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Question(s):

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.

Response:

It is appropriate to revisit customer cost comparisons when there are material changes to key underlying assumptions that would be reasonably expected to materially impact the outcome of the comparison. As described in Exhibit O, paragraph 9, recent examples include the Federal Greener Homes Grant for heat pumps (\$5,000 for a cold climate heat pump) ceasing application intake in Q1 2024, and the consumer carbon charge being set to \$0 on April 1, 2025. These types of changes to consumer capital and operating cost assumptions can have material impacts on any operating cost and lifetime cost comparisons involving heat pumps.

In addition, for illustrative fuel cost assumptions such as the electricity and natural gas rates included in the HRS disclaimer, Enbridge Gas considers it reasonable to periodically review/refresh key rate inputs and directly related values to keep the information reasonably current, while balancing the review frequency with the associated effort and administrative complexity. Enbridge currently expects to undertake this type of refresh approximately every six months.

Because natural gas and electricity rates are updated at different times throughout the year, typically quarterly and not synchronously, updating the disclaimer each time any individual rate changes would require frequent revisions, and the effort would be disproportionate to the purpose of the illustrative comparison. These periodic updates are not intended to involve a full review or revision of the broader disclaimer content or all assumptions

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Question(s):

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).

Response:

Enbridge Gas has not stated or represented that the Reply Evidence was developed by an independent expert or that it is being filed under Rule 13A of the OEB's Rules of Practice and Procedure. The Reply Evidence was prepared and filed as Enbridge Gas's responding evidence in the proceeding. The witnesses who authored the evidence, and their CVs, are set out in Exhibit I.ED.EGIReply-3.

Enbridge Gas does not agree with the characterization that the Reply Evidence is argument rather than evidence. The Reply Evidence was filed in accordance with Procedural Order No. 5 and responds to the intervenor evidence submitted by Environmental Defence and Green Energy Coalition in relation to Issue 13(d).

The Reply Evidence is intended to be supplemental to the evidence previously filed by Enbridge Gas at Phase 3 Exhibit 1, Tab 16, Schedule 1, the associated interrogatory responses, and Enbridge Gas's May 1, 2026, response to the Environmental Defence/Green Energy Coalition evidence request. It provides Enbridge Gas's evidentiary response to the Energy Futures Group evidence, including additional context regarding the purpose, scope, assumptions, limitations, and intended customer-facing use of the disclaimer information. To the extent that the Reply Evidence sets out Enbridge Gas's positions on Issue 13(d), this is intended to be helpful to the OEB and parties, taking into account that the remaining outstanding issues in Phase 3 are being addressed in a written hearing.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

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]

Question(s):

- 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.

Response:

- a) The HRS disclaimer is not intended to provide customer-specific outcomes or detailed economic forecasts and presenting it as though it should function in that manner mischaracterizes its purpose. As set out in the Reply Evidence¹, the disclaimer is a consumer-facing disclosure designed to be broadly applicable, understandable, and proportionate to program-level communication.

¹ Exhibit O, June 5, 2026.

Providing detailed or “more specific” information at this stage would require assumptions about individual customer circumstances that are not known and would risk presenting results as predictive despite the acknowledged variability in outcomes.

The HRS disclaimer appropriately avoids this by:

- Identifying the key factors that influence outcomes; and
- Directing customers to obtain site-specific advice from HVAC professionals for detailed analysis for their circumstances.

Accordingly, the difference is not one of “impact and value,” but of fit-for-purpose communication. The value of the HRS disclaimer lies in clear, transparent, and appropriately qualified guidance, rather than overstating precision in circumstances where precision is not possible.

- b) The HRS disclaimer ensures that customers engaging with the program are provided with timely, accessible, and appropriately qualified information within the program context, including the important point that reduced natural gas consumption does not necessarily translate into lower total energy bills.

The disclaimer does not exist to replicate external materials. The HRS disclaimer:

- Provides program-specific, decision-relevant information at the point when the customer is considering participation;
- Ensures that information is current and periodically updated, rather than potentially outdated;
- Presents key considerations in a way that customers do not need to independently search for, select, or reconcile.

- c) Confirmed.