

Elson Advocacy

June 23, 2026

Ritchie Murray

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

Dear Mr. Murray,

**Re: Enbridge Gas Inc. 2024 to 2028 Rates Application – Phase III
EB-2025-0064**

I am writing on behalf of Environmental Defence Canada and the Green Energy Coalition (“GEC”) to request an order that Enbridge provide full and adequate responses to interrogatories I.ED.EGIReply-2 and 4.

I.ED.EGIReply-2

This interrogatory relates to the allegation made by Enbridge in its reply evidence that “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.”¹ Environmental Defence asked the following question in response: “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)?”

This question is relevant because EFG relied on figures set out in the OEB’s Natural Gas Demand Side Management Technical Resource Manual (“TRM”)² in preparing evidence for this proceeding.³ For example, EFG’s conclusion that “a customer would pay over \$500 more in annual energy costs if they installed a gas furnace than if they installed a cold climate heat pump designed to meet the entire heating load of a home” in a gas expansion community is based on efficiency ratings and other assumptions from the OEB’s TRM. Therefore, if efficiency ratings in the OEB’s TRM account for the energy used in the defrost cycle, then so does EFG’s evidence, contrary to Enbridge’s assertion.

Enbridge’s response to the interrogatory is not compliant with Rule 27. Instead of providing an answer, Enbridge side-steps the question.⁴ Seeing as the question is relevant, Enbridge should be ordered to answer it.

¹ I.ED.EGIReply-2, preamble.

² OEB’s Natural Gas Demand Side Management Technical Resource Manual v10.0, March 19, 2026 ([link](#)).

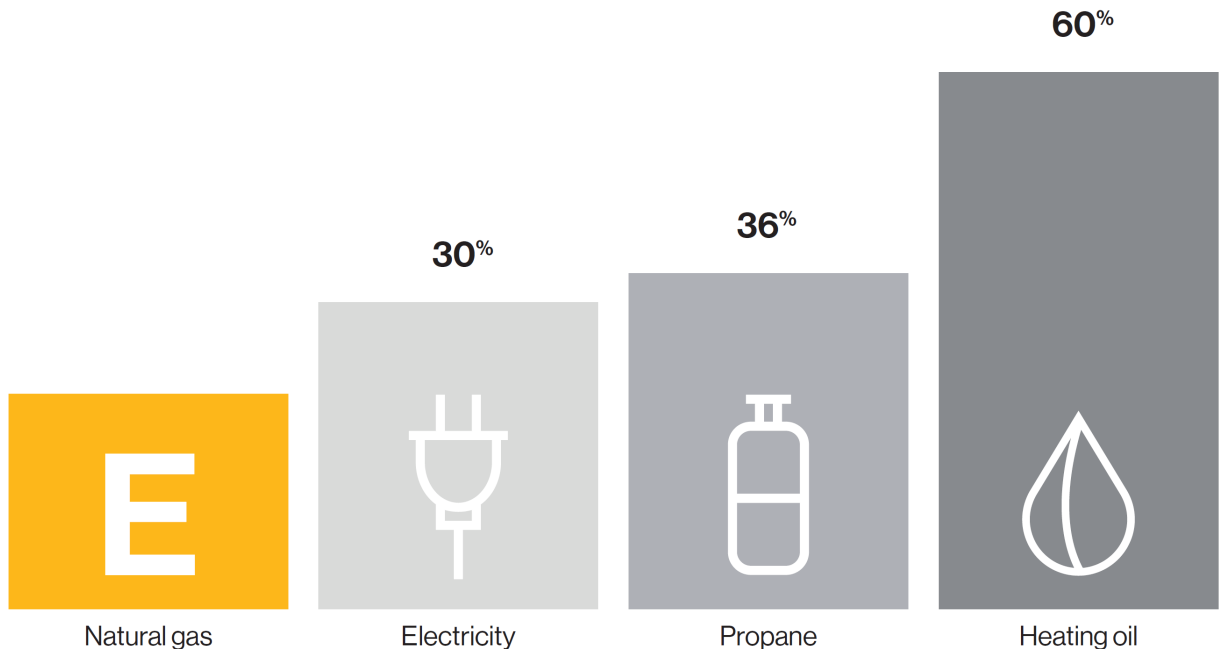
³ EFG Evidence, May 15, 2026, p;. 1 & 6-8; EFG Interrogatory Responses, M1-PP-2.

⁴ I.ED.EGIReply-2.

I.ED.EGIReply-4

This interrogatory reads as follows:

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?”⁵



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 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).

⁵ EB-2024-0111, Phase 2 Exhibit 1, Tab 16, Schedule 1, Attachment 1, Page 12

Consistent with the DSM TRM, please account for cooling costs in the bar chart. Please provide all underlying calculations.

Enbridge's response is as follows:

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 indicates that it has no plans to *release* updated cost comparison materials for gas expansion projects. However, it is unclear whether such materials have been prepared, at least in draft form. Enbridge should be ordered to clarify whether draft materials have been prepared, and if they have, to provide the latest draft of any such cost comparison materials, even if they have not been released yet, as originally requested. This is clearly relevant to the issue before the OEB.⁶

Parts (b) and (c) of the interrogatory are also relevant and should be answered. The answers would provide a helpful illustration of how monthly cost comparison information could be provided if the previous format was used, with the simple addition of a bar for heat pumps. This is particularly helpful as Enbridge would undertake the underlying calculations, such that it could not dispute those calculations. This is relevant to the appropriateness of Enbridge's draft materials (if they exist and are released) and also relevant to whether Enbridge should be required to issue corrections to customers and potential customers who received misleading materials.

The relevance of parts (b) and (c) is further bolstered by the *Procedural Order #3* in the Lanark/Balderson gas expansion case (EB-2025-0306). In that case, an intervenor sought to introduce evidence regarding marketing in the relevant area, which it argued was misleading. This could have supported requests for relief such as directions that Enbridge issue corrections to those who received misleading information. The OEB held that issues around these marketing materials should instead be heard as part of this phase III rebasing case. The OEB stated as follows:

CNL's proposed evidence would also address Enbridge's marketing materials. CNL acknowledged that Enbridge Gas's marketing materials are at issue in the Enbridge Rebasing Phase 3 proceeding (Phase 3). In Phase 3, the OEB made provision for the filing of evidence regarding the fairness and accuracy of Enbridge Gas's marketing

⁶ That relevant portion of the settlement agreement wording reads as follows: "Enbridge Gas agrees that beginning 45 days after the filing of this Settlement Proposal, Enbridge Gas shall not include statements, including cost comparison charts, related to the relative cost-effectiveness of natural gas heating or to savings that can be achieved with natural gas heating in written marketing materials, or reference materials aimed at customers, potential customers, HVAC contractors, or builders, that the Company distributes unless it includes a comparison with the relative cost-effectiveness of heating with electric cold climate heat pumps. This includes all such material disseminated in Ontario by Enbridge Gas, or by Enbridge affiliates on behalf of Enbridge Gas, to customers, potential customers, HVAC contractors, and builders. Enbridge Gas agrees that updated materials shall be filed in Phase 3 of the 2024 rates proceeding, or in a subsequent proceeding if not complete at that time."

materials in Procedural Order #5. The OEB finds it would be duplicative to hear evidence in this proceeding, as the scope of the issue in Phase 3 applies to Enbridge Gas's marketing materials beyond those potentially circulated within the subject area of this proceeding.⁷

Evidence on marketing materials distributed in gas expansion communities is clearly within scope.

Finally, the relevance of the requested information is supported by the OEB's mandate. Section 2 of the *Ontario Energy Board Act, 1998* states that the OEB "shall be guided by" several objectives, which include "[t]o inform consumers ... with respect to prices and the reliability and quality of gas service."⁸ Appropriate customer information is clearly within the core mandate of the OEB.

For the reasons set out above, Environmental Defence and GEC request that Enbridge be ordered to provide full and adequate responses to I.ED.EGIReply-2 and 4.

Yours truly,



Kent Elson

cc: Parties to the above proceeding

⁷ EB-2025-0306, *Procedural Order* #3, pp. 8-9.

⁸ *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, s. 2(2).