

BY EMAIL AND RESS

June 24, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON
M4P 1E4

Dear Mr. Murray:

**Re: EB-2025-0064 Enbridge Gas Phase 3 – 2024 Rebasing
Enbridge Gas response to Environmental Defence and Green Energy Coalition
motion**

On June 23, 2026, Environmental Defence Canada (ED) and Green Energy Coalition (GEC) filed a letter requesting that the OEB order Enbridge Gas to answer two interrogatories related to Enbridge Gas's Reply Evidence.

As set out below, Enbridge Gas maintains that it has responded to the first of these interrogatories, and that the second interrogatory is not relevant and need not be answered.

Exhibit I.ED.EGIReply-2

This question asks *“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)?”*

Enbridge Gas responded with an explanation as to why the Technical Resource Manual (TRM) is not applicable to customer-facing communications with illustrative energy cost impacts and indicated that the Company did not use the TRM to develop the HRS disclaimer. In that answer, Enbridge Gas noted that “[t]he TRM includes standardized assumptions related to operating conditions”.

The overall intent of the Company's response was to indicate that (as ED is well aware), the TRM does account for energy used in the defrost cycle, but this is not relevant to the HRS disclaimer.

As this intent was apparently not clear to ED, an updated response Exhibit I.ED.EGIReply-2 is attached.

Exhibit I.ED.EGReply-4

This question asks about updated cost comparison materials for gas expansion projects (including a request to produce draft materials) and then asks Enbridge Gas to provide an updated version of a bar chart that the Company had previously used.

Enbridge Gas responded that it has no current plans to release updated cost comparison materials for gas expansion projects, and that the requested bar chart information is not relevant to Issue 13(d).

Enbridge Gas maintains its position.

The Company's statement that it has no current plans to release updated cost comparison materials for gas expansion projects is clear. While no commitments are being made as to what might happen in the future, Enbridge Gas has no plans at this time to release updated cost comparison materials.

Related to ED's request for Enbridge Gas to provide any draft cost comparison materials for gas expansion projects, the Company has two responses. First, there are no such draft materials. The Company is not planning to release updated cost comparison materials for gas expansion projects and has not prepared drafts of any such materials. Second, and in any case, it would not be relevant or appropriate to require production of draft materials. These would be a work-in-progress, for internal purposes. The OEB's review of any marketing-type materials should be limited (at most) to looking at what is actually provided to customers.

ED's request that Enbridge Gas prepare and provide an updated version of a bar chart with bars added for space heating, water heating, and heat pump is not relevant to what is in scope for Issue 13(d).

Issue 13(d) relates to whether Enbridge Gas has met its commitments to stop using marketing materials that include cost comparisons without cold climate heat pumps, and to whether Enbridge Gas has filed any updated marketing materials now being used.

ED takes an expansive view of this issue, and says that production of the requested updated bar chart is relevant to the appropriateness of the Company's draft materials (which, as noted, do not exist), and to whether Enbridge Gas should be required to issue corrections to customers and potential customers who received misleading materials.

Enbridge Gas specifically objects to the suggestion that the question of whether the Company should take remedial action in relation to marketing materials previously used is part of Phase 3. That is not part of Issue 13(d) in Phase 3.

In Phase 2, the OEB's Issue #24 asked *"Has Enbridge Gas appropriately reviewed the energy comparison information in its informational and marketing materials, and taken appropriate actions based on its review?"*

In Exhibit I.1.16-ED-24 in Phase 2, ED asked whether the Company agreed that it should provide information to its customers to ensure that they were not misled by marketing materials they

received before the changes were implemented in 2023 and 2024. Enbridge Gas responded by saying no, for several reasons.

There was a complete settlement of Issue 24 in Phase 2, with Enbridge Gas agreeing to stop using marketing and customer-focused reference materials that include cost comparisons, unless the comparisons include electric cold climate heat pumps. This settlement did not include any requirement for Enbridge Gas to issue any updated remedial materials to customers but rather it prescribed what would happen on a go-forward basis.

Contrary to ED's suggestion, the OEB did not expand the scope of Issue 13(d) in the Procedural Order cited from the EB-2025-0306 case. Instead, in response to submissions from an organization affiliated with ED (CNL), the OEB simply pointed to the fact that the question of the fairness and accuracy of Enbridge Gas's marketing materials is in scope for Phase 3 and pointed to Procedural Order No. 5 in this case.

Taking all of this together, Enbridge Gas submits that the scope of Issue 13(d) in Phase 3 is narrow and clear. The issue is whether Enbridge Gas has complied with the OEB's directions and any other previous commitments. The issue is not what marketing materials other parties would like Enbridge Gas to use. It is also not what remedial steps should be taken in relation to marketing materials previously used by Enbridge Gas.

It is not appropriate, useful or relevant to have Enbridge Gas prepare and provide updated bar chart information as requested by ED where the Company has no intent to use such information in marketing materials. As the OEB stated in its recent Decision and Order in the East Gwillimbury Community Expansion Leave to Construct Project "*The onus remains upon Enbridge Gas to ensure the accuracy of its customer information. However, this differs from mandating Enbridge Gas the provision of information concerning alternative energy services in preference of their own offering.*"¹

Based on the submissions set out in this letter, Enbridge Gas requests that the OEB decline ED's requests, and dismiss the motion.

Please let us know if you have questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

C: all parties in EB-2025-0064

¹ [EB-2023-0343 Decision and Order, May 14, 2026](#), page 38.

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 (including electricity consumption for a defrost cycle to remove ice build-up), but those assumptions are developed for DSM savings calculations, not customer-facing communications with illustrative energy cost impacts.

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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.