

27 December 2019

Ontario Energy Board  
Attn: Christine E. Long, Registrar and Board Secretary  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto, ON  
M4P 1E4

Dear Ms Long

**Re: EB-2019-0255 - Draft Guidelines for Potential Projects to Expand Access to Natural Gas Distribution – GEC Comments**

GEC has reviewed the Draft Guidelines. While GEC is concerned that expansion of the gas grid in an era of climate crisis is ill advised both from an environmental and a long-term economic perspective, we appreciate that the impetus for this initiative is a Ministerial directive, not a Board sponsored effort. However, we are alarmed that the Board's draft guidelines simply ignore the climate context. The guidelines do not require an assessment of the local and upstream GHG implications of grid expansion versus alternatives such as conservation or GHG efficient alternatives such as air to air heat pumps. Nor do the guidelines address how expansions conform or conflict with government policy commitments to GHG emission reduction targets. We respectfully request the Board to amend the draft to address these issues.

Please note that GEC is not requesting cost eligibility as our participation is expected to be limited to this correspondence. We apologize for our late indication of our intended participation.

Sincerely,



David Poch