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May 11, 2021  
Our File No. 72737

Ontario Energy Board  
23 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

**Attention: Christine E. Long, Board Registrar**

Dear Ms. Long:

**Re: Northwestern Ontario Chambers of Commerce Coalition ("NWCOC") Written  
Comments  
Consultation on Enbridge Gas Inc.'s Annual Update to Five Year Gas Supply Plan  
Ontario Energy Board: EB-2021-0004**

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As legal counsel to the Northwestern Ontario Chambers of Commerce Coalition ("NWCOC"), we participated in the Stakeholder Conference held April 26<sup>th</sup> and 27<sup>th</sup>, 2021 during which Enbridge Gas Inc. (EGI) answered questions related to its five year Gas Supply Plan (GSP).

Please find enclosed NWCOC's written comments related to EGI's five year GSP, respectfully submitted on behalf of NWCOC.

Yours very truly,

WEILER, MALONEY, NELSON

Per:

NICK A. MELCHIORRE

NAM/rp

Encl.

cc'd: *Enbridge Regulatory (via email)*  
*All Parties (via email)*

**Weiler, Maloney, Nelson**

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**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sch. B, as amended;

**AND IN THE MATTER OF** the Ontario Energy Board's Consultation to Review Enbridge Gas Inc.'s Annual Update to Natural Gas Five Year Supply Plan

**WRITTEN COMMENTS OF NORTHWESTERN ONTARIO CHAMBERS OF  
COMMERCE COALITION ("NWCOC")**

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**SUBMITTED BY: NICK MELCHIORRE**

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**Counsel for Northwestern Ontario Chambers of Commerce Coalition**

**NWCOC Written Comments**

As legal counsel to Northwestern Ontario Chambers of Commerce Coalition (“NWCOC”), we participated in the April 13-14 Stakeholder Conference during which Enbridge Gas Inc. (“EGI”) answered questions related to its Annual Update to its five year (2020-2025) Gas Supply Plan (GSP).

As indicated in our March 2, 2021 letter indicating NWCOC’s intent to participate in this GSP review, NWCOC’s participation on gas supply planning matters is informed by the fact that it represents over 2,000 commercial and business consumers in Northwestern Ontario. Some of its members are ratepayers, however, many members do not yet have access to natural gas services. Our client therefore has seen the first hand economic, social and environmental benefits of natural gas expansion in Northwestern Ontario and seeks further expansion in its region.

NWCOC is encouraged to see reference in the GSP to “Community Expansion” in regards to Phase 1 communities of the Natural Gas Expansion Program. Although all six Phase 1 Projects are not located in our client’s jurisdiction, it submits the “Community Expansion” component of the GSP needs to be expanded to describe in more detail how such expansion is considered and provided for in the annual review. Further, future reviews of the GSP should not just include Phase 2 proponents of the Program and how such expansion impacts the GSP, but discuss community expansion above and beyond the Program. In other words, the public policy objectives of future community expansion in the GSP reviews required greater focus and detail to facilitate the legislative mandate of “rational expansion”<sup>1</sup> of natural gas services to unserved parts of Northwestern Ontario and not just deal with successful proponents of the Program in passing.

Furthermore, NWCOC submits future GSP’s include collaboration with other energy planners in the Northwest, such as the IESO and local stakeholders, whom develop IRRP’s in Northwestern Ontario regions, some of which reference gas fired generation as potential options during the same planning periods as the GSP<sup>2</sup>. In other words, the Community Expansion segments of the GSP should include collaboration with other energy planners in the Northwest and their policy statements and future plans.

NWCOC appreciates the opportunity to participate in this review and provide these brief comments on EGI’s 2021 GSP update.

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<sup>1</sup> Section 2 (3) *Ontario Energy Board Act*, 1998, S.O. 1998

<sup>2</sup> [Northwest Scoping Assessment – Regional Planning Engagement Webinar \(for example page 40\)](#)