

May 25, 2022

**VIA RESS**

Ms. Nancy Marconi  
Registrar  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Marconi:

**Re: EB-2022-0072: Ontario Energy Board (OEB) Consultation to Review Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc. (EGI).**

**Industrial Gas Users Association (IGUA) Comments.**

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On behalf of IGUA we reviewed EGI's 2022 Gas Supply Plan Update filing, and participated in the ensuing Stakeholder Conference. As indicated in IGUA's participation request letter herein, while IGUA's members do not generally take system gas supply, they are impacted by the influence which EGI's gas supply planning and implementation activities have on the liquidity and robustness of the Ontario gas market, including with respect to alternative sources of gas supply and initiatives towards the use/blending of alternative fuels with Ontario's natural gas supply.

We found EGI's filing and associated Stakeholder Conference process informative. In particular, and within the scope of IGUA's interest in gas supply planning, we observe the following:

1. There was discussion during the Stakeholder Conference regarding the interplay between gas supply planning and EGI's upcoming rebasing application. The 5 year gas supply planning and update cycle is a regulatory mechanism, not an EGI operational practice. EGI actually does a 5 year gas supply forecast and associated near term plan every year. The gas supply planning/rebasing interplay issue is one entirely within the OEB's procedural control.<sup>1</sup> The OEB should consider deferring the next full 5 year gas supply plan review to follow the determination of EGI's rebasing application, as a number of matters influencing gas supply planning will be reviewed and determined in that application<sup>2</sup> (as commented on

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<sup>1</sup> Transcript 1, pp. 62-65.

<sup>2</sup> Transcript 1, pp. 65-66.

more extensively by others in this matter). The OEB could simply continue the annual update process in the interim.

2. The gas supply planning process is informed by the recently mandated EGI IRP process, and not the other way round. IRP issues are engaged in infrastructure planning, and the gas supply plan responds to IRP initiatives consequently adopted, but gas supply planning itself does not entail evaluation of IRP alternatives.<sup>3</sup>
3. In order to provide transparency in respect of certified natural gas, EGI should consider including in its future gas RFP's a request that respondents indicate whether the gas that they are offering is certified, and if so pursuant to what certification criteria.<sup>4</sup> In doing so, EGI could also make clear that it does not pay a premium for certified natural gas, and that certification is not a requirement for RFP response, though it is a factor that EGI may consider in conjunction with all other relevant factors.

On behalf of IGUA, we appreciate the opportunity to participate in this process and provide brief comment.

Yours truly,



Ian A. Mondrow

- c. S. Rahbar (IGUA)  
K. Viraney (Board Staff)  
Participants of Record

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<sup>3</sup> Transcript 1, pp. 77-78.

<sup>4</sup> Transcript 1, pp. 137-138.