

BY EMAIL AND RESS

January 23, 2025

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON
M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc.
5 Year Gas Supply Plan
Request for Filing Date Extension**

On January 15, 2025, the OEB issued the *OEB Staff Report to the OEB: Review of 2024 Annual Update to Enbridge Gas Inc. Natural Gas Supply Plan*. The OEB Staff Report was endorsed by the OEB.

The OEB Staff Report found that there was no issue requiring a hearing arising from the 2024 Annual Update. The OEB Staff Report then addressed Enbridge Gas's upcoming 5-Year Gas Supply Plan filing. Among other things, the OEB Staff Report recommended that the 5-Year Gas Supply Plan should be subject to an adjudicative process by a panel of OEB Commissioners, and stated March 1, 2025 as an expected filing date. The OEB Staff Report also included a number of recommendations, which were endorsed by the OEB, to be addressed in the Company's 5-Year Gas Supply Plan (beyond what is set out in the Gas Supply Framework). These additional items are summarized in the two-page Appendix B to the OEB Staff Report.

Enbridge Gas has now had opportunity to complete a preliminary review of the OEB Staff Report and its recommendations. It is apparent that the proposed timing to complete and file the 5-Year Gas Supply Plan application by March 1, 2025, will be very challenging, especially considering the new items (around 10) that are required to be included in the filing.

Enbridge Gas requests that the filing date be moved to May 1, 2025.

Finally, to ensure that there is no confusion or mistaken assumptions, we wish to confirm Enbridge Gas's proposed approach for the 5-Year Gas Supply Plan filing. The OEB Staff Report stated that the filing should cover the 2025-2029 period. Enbridge Gas is intending that its filing will cover the period beginning November 1, 2024 and running up to October 31, 2029. This takes account of the fact that the Company's gas supply plans are prepared for the gas year starting on November 1st each year. This approach also ensures that there is no "gap", since the last filed Annual Update covering the period from November 1, 2023 to October 31, 2024.

The 2024/25 gas supply plan (beginning November 1, 2024) is the Company's most current gas supply plan. The annual gas supply planning process is a complex process involving numerous departments across the Company and is only prepared once a year and finalized just months

prior to the beginning of the November 1 gas year. Given the complexity and timing of the planning process across the Company, Enbridge Gas must adhere to strict annual planning process timelines for preparation of the gas supply plan. It is not possible to prepare gas supply plans before the underlying demand forecasts and other inputs are completed.

The Company's 2024/25 gas supply plan reflects the outcomes from the EB-2022-0200 Rebasing Phase 1 Decision but does not reflect outcomes from the EB-2024-0111 Rebasing Phase 2 approved Partial Settlement or the forthcoming decision on Phase 2 outstanding items (which include the proposed Lower-Carbon Energy Program).

Enbridge Gas will implement impacts from the Phase 2 approved Partial Settlement and the forthcoming decision with the 2025/26 gas supply plan. The 2025/26 gas supply plan will be the first annual update to the 5-Year Gas Supply Plan. This plan will not be finalized until September of 2025 for implementation starting November 1, 2025.

Gas supply related impacts from the Phase 2 Partial Settlement and the forthcoming decision that will be reflected for the first time in the 2025/26 gas supply plan include:

- Harmonization of legacy gas supply plans into a single, consolidated gas supply plan,
- Total storage requirement of 217.7 PJ including 18 PJ of market-based storage, based on the aggregate excess methodology,
- Maximum firm withdrawal and injection capability of 4.0 PJ/day and 1.7 PJ/day, respectively,
- 15.6 PJ of storage for operational contingency managed using inventory targets, and
- If approved as part of the outstanding Decision, proposal to procure renewable natural gas as part of the gas supply portfolio.

Given the OEB's timing expectations for the upcoming 5-Year Gas Supply Plan, Enbridge Gas expects that the 2025/26 Annual Update will be the process where the implementation of the Rebasing Phase 2 changes relevant to gas supply will be reviewed.

Please let us know if you have questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

C: all parties in EB-2024-0067