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February 18, 2025

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, P.O. Box 2319  
Toronto ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2024-0111 Enbridge Gas Inc. 2024 Rebasing and IRM: Phase 2 Unsettled Issues**

Attached is the submission of Six Nations Natural Gas (SNNG) in the EB-2024-0111 proceeding related to the Phase 2 Unsettled Issues.

Respectfully submitted by

A handwritten signature in black ink, appearing to read "Tracy Skye", is positioned above the printed name.

Tracy Skye  
General Manager  
Six Nations Natural Gas

c.c. Linda Wainewright (Wainewright Consulting Ltd.)

**Enbridge Gas Inc. 2024 Rebasing and IRM: Phase 2 Unsettled Issues**

**Six Nations Natural Gas Submission**

Six Nations Natural Gas (SNNG) supports approval of the Indigenous Participation Framework Proposal for procurement of Renewable Natural Gas (RNG) under Enbridge Gas' Lower-Carbon Voluntary Program (LCVP) as discussed below as well as the LCVP as proposed. SNNG takes no position on Enbridge Gas' proposed change to the calculation of the Meter Reading Performance Measure metric or the proposed mechanism to decouple revenue from customer numbers.

SNNG customers began their energy transition to natural gas relatively recently, with some customers still paying for this first energy transition having only moved away from wood or oil heating over the past few years. Based on our recent experience with the energy transition to natural gas, SNNG believes the next energy transition for our customers is likely to take a decade or longer to have a significant impact on our system, not a few short years.

In general, SNNG supports the development of an RNG market as one of many levers that will be required to reduce carbon emissions in as cost-effective manner as possible. SNNG supports approval of the Indigenous Participation Framework Proposal as a reasonable starting point toward economic reconciliation. The Indigenous Participation Framework Proposal provides the opportunity for community members who are interested to promote cleaner fuels and participate in the development of this new energy source.

Being sensitive to the cost of RNG, SNNG is concerned about proposals that may restrict Enbridge to RNG projects that have higher emissions reduction impacts yet cost more per cubic meter. We believe the monthly bill impact provides a sufficient guardrail for this initial program and that customers charged the Federal Carbon Charge should be able to secure RNG benefits at the lowest cost per cubic meter similar to the approach used in other provinces at this time.

In summary, SNNG supports the approval of the Indigenous Participation Framework Proposal for the procurement of RNG as well as the LCVP as proposed by Enbridge Gas. Finally, SNNG takes no position on the Meter Reading Performance Measure metric or the proposed mechanism to decouple revenue from customer numbers at this time.

Respectfully submitted this 18<sup>th</sup> day of February, 2025.

Tracy Skye  
General Manager, Six Nations Natural Gas