From: Office of the Registrar

To: <u>Jessy Serrao</u>

Subject: Fw: Intervention Form: EB-2025-0065 - Summitt Energy Management Inc.

Date: Thursday, June 5, 2025 4:12:18 PM

Intervention Form

Case Number:

EB-2025-0065

Intervenor Name:

Summitt Energy Management Inc.

Mandate and Objectives:

Summitt Energy Management Inc. is a licensed energy marketer and gas supplier operating across multiple jurisdictions, including Ontario. Our mandate is to provide competitive energy services to residential, commercial, and institutional customers, while maintaining compliance with regulatory frameworks established by the Ontario Energy Board.

We actively monitor regulatory developments that may impact energy procurement, cost allocation methodologies, infrastructure access, and market conditions. The objective of this intervention is to assess potential impacts of Enbridge Gas's 5-Year Gas Supply Plan (EB-2025-0065) on competitive market participants, particularly with respect to upstream transportation planning, storage portfolio adjustments, and commodity sourcing strategies. We seek intervenor status to remain informed throughout the proceeding and reserve the right to make submissions should material issues arise that could affect our operations or our customers' cost exposure.

Membership of the Intervenor and Constituency Represented:

Summitt Energy Management Inc. is a privately held corporation. We do not operate on a membership basis, but rather serve a broad portfolio of residential, commercial, and institutional customers across Ontario and other jurisdictions.

In this proceeding, we represent the interests of competitive energy suppliers and market participants who may be impacted by decisions related to gas procurement, storage planning, and transportation cost recovery. Our perspective is informed by our role as a licensed marketer actively engaged in the Ontario energy market.

Programs or Activities Carried Out by the Intervenor:

Summitt Energy Management Inc. is a licensed energy retailer engaged in the marketing, sale, and management of natural gas and electricity contracts for residential and commercial customers. We structure energy procurement agreements, manage customer enrollments, and

ensure regulatory compliance across multiple jurisdictions.

Our activities include contract structuring, energy forecasting, customer service operations, and ongoing engagement with regulatory developments that may impact pricing, service quality, or market competitiveness.

Governance Structure:

Summitt Energy Management Inc. operates with a corporate governance structure that includes an executive leadership team and designated departmental leads responsible for regulatory affairs, legal compliance, and market operations. Regulatory matters are managed by the Regulatory and Compliance team, which reports directly to senior leadership. The company's appointed representatives in this proceeding will coordinate internally with the executive team and legal counsel as needed. All positions taken or submissions made during the proceeding will be informed by internal review and aligned with Summitt Energy's regulatory strategy and operational objectives.

Representatives:

Raul Villalon rvillalon@summittenergy.ca 905-366-4461

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Other Contacts:

Frequent Intervenor Form:

OEB Proceedings:

Summitt Energy Management Inc. has not applied for intervenor status in any OEB proceedings in the last 12 months.

Issues:

As a licensed energy retailer operating in Ontario, Summitt Energy Management Inc. could be materially impacted by several components of the Enbridge Gas 5-Year Gas Supply Plan (EB-2025-0065), particularly those involving upstream transportation planning, gas supply procurement strategy, and cost recovery mechanisms.

The proceeding's current scope includes planning assumptions, reliability, cost-effectiveness, and supply portfolio design, all of which could influence:

- Commodity costs and allocation methodologies that may affect competitive pricing and market access for energy marketers;
- Changes in reliance on Dawn purchases and market-based storage, which could alter the structure of balancing services or supply flexibility;
- Rebasing impacts and zone-level rate structures, which may indirectly influence retailer margins or cost pass-throughs to end-users;
- Deferred treatment of low-carbon commodity procurement, where excluding retailer voices could limit future participation in decarbonization pathways.

We are seeking intervenor status primarily to monitor how these issues develop and ensure that the perspective of competitive gas marketers is represented. At this time, we do not believe any relevant issues are missing from the proceeding's expected scope, but we reserve the right to raise concerns should material gaps emerge.

Policy Interests:

Summitt Energy Management Inc. represents the policy interest of promoting competitive energy markets in Ontario. This includes supporting transparent gas procurement frameworks, non-discriminatory access to infrastructure, and cost allocation methodologies that reflect the needs of both regulated utilities and competitive market participants.

These interests directly relate to the current proceeding's focus on:

- The structure and sourcing of the gas supply portfolio
- Upstream transportation planning
- Rate recovery and rebasing implications
- The future treatment of low-carbon procurement strategies

Ensuring these components are designed with competitive neutrality and long-term market health in mind is essential for enabling customer choice and maintaining a level playing field between utilities and licensed retailers.

Hearings:

Summitt Energy Management Inc. does not object to the form of hearing chosen by the OEB. However, given the complexity and potential long-term impact of the 5-Year Gas Supply Plan, we believe a written or electronic hearing would be appropriate and sufficient to ensure transparency, participation, and administrative efficiency.

Should material issues arise that require clarification or stakeholder input, an electronic format would allow broader participation from interested parties without the burden of in-person attendance.

Evidence:

Summitt Energy Management Inc. does not anticipate filing evidence in this proceeding at this time. Our objective in seeking intervenor status is to monitor the development of issues relevant to competitive gas marketers, and to remain positioned to participate if material concerns arise that warrant further input.

Coordination with Other Intervenors:

Summitt Energy Management Inc. is open to coordinating with other intervenors that represent competitive energy retailers or commercial market participants to avoid duplication of effort and ensure efficient participation. If similar interests are identified during the proceeding, we will make reasonable efforts to align positions, share perspectives, and minimize redundant submissions or interrogatories.

Cost Awards:

Summitt Energy Management Inc. is not applying for cost award eligibility. As a for-profit licensed energy marketer, we do not meet the OEB's cost eligibility criteria outlined in section 3 of the OEB's Practice Direction on Cost Awards.

Language Preference:

No, Summitt Energy Management Inc. does not intend to participate in the hearing using the French language.