



Eric VanRuymbeke
Sr. Advisor
Leave to Construct Applications
Regulatory Affairs

tel 519-436-4600 x5002241
EGIRegulatoryProceedings@enbridge.com
eric.vanruymbeke@enbridge.com

Enbridge Gas Inc.
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

July 22, 2025

VIA EMAIL and RESS

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas or the Company)
Ontario Energy Board (OEB) File: EB-2023-0343 (Proceeding)
Application for East Gwillimbury Community Expansion Project (Project)**

In the OEB's letter dated March 19, 2025,¹ through which the Proceeding was placed into abeyance, the OEB stated:

The OEB will resume processing the application following receipt of the Ministry's letter of opinion. If there is a significant delay, the OEB will further consider how best to proceed with the processing of the application.

To date, Enbridge Gas has not received a letter of opinion for the Project from the Ministry of Energy and Mines (Ministry) and it is unclear when the Ministry will conclude its assessment. Pursuant to the OEB's March 19th letter, we are writing to advise the OEB of the Project impacts as a result of the significant delay in processing the application and request that the OEB issue direction on how best to resume processing the application at the earliest opportunity.

Enbridge Gas supports the ongoing discussions with Mississaugas of Scugog Island First Nation (MSIFN) and other First Nations regarding the Project. This aligns with Enbridge Gas's commitment to continue with meaningful consultation with Indigenous communities throughout the Project lifecycle. To this end, Enbridge Gas is prepared to file an updated Indigenous Consultation Report (ICR) upon request from the OEB, to detail consultation activities undertaken since the last ICR filing on February 13, 2025.

On July 16, 2025, the Ministry advised Enbridge Gas that it has scheduled a meeting with MSIFN on August 11, 2025 to review the additional Enbridge Gas responses to MSIFN sent on May 28, 2025 regarding comments and questions about the Project Environmental Report (ER), and to determine if MSIFN has any outstanding concerns. Enbridge Gas hopes that the Ministry's opinion letter will follow soon after the August 11th meeting.

In this light, and in the context of the OEB's statement that it will, "if there is a significant delay...further consider how best to proceed with the processing of the application", Enbridge Gas respectfully files this update to ask the OEB to consider how best to resume with this Proceeding to assist with mitigating against the impacts of delays to date on the Project and the

¹ <https://www.rds.oeb.ca/CMWebDrawer/Record/892949/File/document>

risk of the Project missing the start date (of the revised construction window); and ensure that customer attachments for the upcoming heating season are not unduly jeopardized. Actual and expected Project impacts resulting from the regulatory processing delay are summarized below by topic:

Financial Impacts

- **Additional Alliance Partner (AP) contractual costs:** Estimated at approximately **\$250,000**.
- **Additional permit costs:** Estimated **\$5,000** required for reapplying for expired permits related to service installations.
- **Turtle fence installation:** Estimated **\$50,000–\$100,000** due to construction being extended beyond April 1, 2026, to comply with environmental regulations.
- **Internal labour & Interest During Construction:** Ongoing internal labour and indirect costs will continue to accrue during the abeyance.

Project delays of this nature are not contemplated in the estimated contingency amount, thereby increasing the risk of exceeding the total estimated costs.

Impacts on Scheduling & Project Dependencies

- **Portfolio coordination:** Construction plans must be optimized with AP across multiple projects. Delays in one project may cascade and affect others.
- **Revised construction window:** Tentative new construction schedule is October 2025 – August 2026.
- **Revised energization timeline:** Originally targeted 80% completion by end of 2025; current forecast is now 30% completion by end of 2025 (assuming a construction start date of October 2025).

Operational Impacts

- **Resource retention:** Prolonged delays are creating significant challenges in retaining construction crews, potentially affecting Project continuity.

Impacts on Stakeholder & Public Relations

- **Public expectations:** Delay may impact public perception and satisfaction regarding service availability.
- **Customer demand:** 100 active applications have been received from potential customers, indicating strong interest and urgency.

Importantly, residents in the service area are concerned about the Project delays and are seeking confirmation of when their service requests will be fulfilled, as evidenced in the Letter of Comment filed with the OEB on July 3, 2025.²

Enbridge Gas's proposed construction schedule has been revised to now start in October 2025 and continue through much of 2026. Based on current plans, if the application is not approved by mid-September, Enbridge Gas will be challenged to commence construction on any portion

² EB-2023-0343, Letter of Comment dated July 3, 2025: "This project needs to go ahead quickly most of the homes in the area are on oil heat and the tanks are at the end of their life cycle and we are all waiting to put in gas either as primary heat or back up to heat pump either way we have been waiting and we need this done by winter for heat the oil tanks cost 5k to replace we cannot afford to do that then get gas next year. HURRY UP!!!!!!"

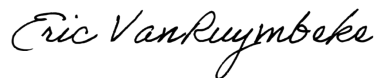
of the Project in 2025 and will not be able to attach customers for the winter season, contrary to the desires of the more than 100 residents who have already applied for service.

Enbridge Gas fully understands the need to satisfy the duty to consult and maintains its view that the duty has been satisfied in relation to the Project. Enbridge Gas has responded to any expressed concerns, identified mitigation measures that will minimize the impacts of the Project, and committed to ongoing consultation throughout the lifecycle of the Project.

As contemplated in the OEB's March 19th letter, Enbridge Gas respectfully requests that the OEB issue direction on how best to resume processing the application at the earliest opportunity. In issuing such direction, we urge the OEB to consider the significant delay and Project impacts described herein, as well as the overall public interest and specific customer choice being served by this Project as part of Ontario's Natural Gas Expansion Program.

After the August 11th meeting scheduled by the Ministry with MSIFN, Enbridge Gas will provide an update to the OEB. If the OEB has not otherwise resumed processing this application by that time, we ask that the OEB be prepared to do so shortly after the update, with the view of issuing a decision before mid-September.

Sincerely,



Eric VanRuymbeke
Sr. Advisor - Leave to Construct Applications

c.c Henry Ren (Enbridge Gas Counsel)
Arturo Lau (OEB staff)
James Sidlofsky (OEB Counsel)
EB-2023-0343 Intervenors