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

August 8, 2025

EB-2025-0065 – Enbridge Five-Year Gas Supply Plan

Dear Mr. Murray:

In accordance with OEB direction, please find attached Pollution Probe's Interrogatories to Enbridge. Pollution Probe is filing these in advance of the August 14, 2025 deadline to assist Enbridge and other stakeholders.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
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Consultant to Pollution Probe
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Email: Michael.brophy@rogers.com

cc: Enbridge Regulatory (via email)
All Parties (via email)
Catherine Nguyen, OEB Case Manager (via email)
Ian Richler, OEB Counsel (via email)
Richard Carlson, Pollution Probe (via email)

EB-2025-0065

ONTARIO ENERGY BOARD

Enbridge Five-Year Gas Supply Plan

POLLUTION PROBE INTERROGATORIES

August 8, 2025

Submitted by: **Michael Brophy**

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Toronto, Ontario M4G 3H4

Consultant for Pollution Probe

2-PP-1

Reference: Enbridge indicates that the Company's gas supply planning principles and practices are [page 5]:

- Cost-effectiveness and
- Reliability and security of supply

Enbridge further notes that the OEB Framework requires use of the following Guiding Principles for planning gas supply.

- Cost-effectiveness and
- Reliability and security of supply
- Public Policy

a) Please provide a copy of the Company's gas supply planning principles and practices document as noted above.

b) Please explain why Enbridge's gas supply planning principles and practices specifically note only two of the three principles from the OEB's list. Also, is Enbridge able to commit to add Public Policy to its internal gas supply planning principles and practices? If not, please explain why not.

2-PP-2

Reference: The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system).

a) Please provide the energy transition adjustments applied and for each ET adjustment applied, please indicate what percent forecast decrease this results in over the forecast timeline (per year and cumulative over the forecast period).

b) Please provide the reports and analysis that support each energy transition adjustments Enbridge is applying to the demand forecast.

c) Please confirm what Enbridge has included in the demand forecast adjustments due to the energy transition other than forecasted customer leaving the gas system.

d) Please provide details on the gas demand decrease Enbridge has included related to hybrid heating systems using natural gas as the backup option. If no adjustments have been included, please explain why not.

2-PP-3

a) Is the Enbridge demand forecast just for a five year period or a longer period? If it is for a longer period, please explain how it is adjusted for use in the gas supply plan.

b) Has Enbridge undertaken any analysis to compare its demand forecast against municipal energy and emission plan forecasts? If yes, please provide those materials. If not, why not.

2-PP-4

Reference: Table 23 Actual vs. Plan Annual HDDs [Page 81]

It appears that the variance between Actual and Plan Annual HDDS is increasing significantly as time goes on. Has Enbridge assessed that trend? If no, why not. If yes, please provide those details and how Enbridge is adjusting to reduce this variance for the future.

2-PP-5

Reference: Scorecard [Appendix E, Page 2]

a) For each scorecard metric, please explain how it measures the benefits expected from results of the gas supply planning decisions Enbridge has made.

b) Has the OEB provided approval for any of the metrics and targets being used by Enbridge in the gas supply scorecard? If yes, please provide the decision references.

c) Many (13 out of 29) of the targets in the scorecard are “N/A” or “C”. Please explain how “N/A” and “C” are used to assess tangible results in alignment with the OEB’s Framework.

d) When was “Percentage of certified gas in the portfolio” added to the scorecard and what how is this used to quantify customer benefits? If customer benefits have been quantified, please provide the analysis.

e) RNG has N/A as the target and is noted as 0% results for each year in the scorecard. Please explain the purpose of this metric?

f) Please explain what Enbridge is doing to encourage and support RNG production in Ontario that is not reflected in the 0% results reported.

4-PP-6

Reference: A final decision from the OEB on the Phase 2 issue of the procurement of lower-carbon energy as part of the gas supply commodity portfolio, including the Lower-Carbon Voluntary Program, remains outstanding as of the time of this filing. [Page 8]. The OEB Decision was issued in May 2025 following Enbridge filing of the gas supply plan.

a) What plans does Enbridge have for the procurement or support for RNG or hydrogen.

b) Please provide a summary of the support activities (including marketing materials) provided by Enbridge to support RNG production in Ontario.

c) Does Enbridge propose to change the RNG scorecard metric? If not, why not? If yes, please provide the new proposed metric and target.

6-PP-7

Please confirm that Enbridge is using a rolling five-year gas supply plan that is updated annually. If not, please explain.

6-PP-8

Other than the OEB process to review Enbridge's gas supply plan, please provide details on any other third party review Enbridge uses to develop and/or review the (draft or final) gas supply plan.

6-PP-9

a) Based on current information, what percent of a typical residential natural gas bill does gas supply costs represent?

b) Based on the total annual natural gas bill costs for all customers, what portion of those costs relate to gas supply costs.

6-PP-10

Reference: Ontario's Energy for Generations plan (Energy for Generations | ontario.ca)

The above-noted major policy document was released by the Province of Ontario following Enbridge's filing of its five-year gas supply plan. Enbridge previously confirmed that it was coordinating with the Province on the natural gas elements.

a) Please detail Enbridge's involvement in the development (directly or through consultation) of this new policy document and please provide copies of all materials (submissions, presentations, emails, etc.) from Enbridge.

b) What policy issues in the Energy for Generations plan are incremental to what Enbridge considered in development of its five-year gas supply plan?

c) Please explain how Enbridge intends to integrate the new policy directions for purposes of its gas supply plan.

d) Please indicate what the increased focus on RNG and hydrogen could mean to the Enbridge gas supply plan.

e) What additional performance metrics may be required to assess Enbridge progress against any of the policy elements in the Energy for Generations plan?

6-PP-11

Reference: June 11, 2025 Directive to the OEB (OC-802-2025.pdf)

The above-noted Directive was issued to the OEB following Enbridge's filing of its five-year gas supply plan. Items in the directive occur over the next year and/or within the timeframe of the gas supply plan.

a) What policy or operational issues outlined in the Directive are incremental to what Enbridge considered in development of its five-year gas supply plans?

b) The Directive to the OEB requires Enbridge to include additional gas supply scenarios. Please explain what additional gas supply scenarios Enbridge has done and/or plans to do in alignment with this new requirement.

c) Please explain Enbridge's understanding of the purpose and Enbridge's responsibilities/role for the new integrated energy planning approach which may impact natural gas planning for the future.

6-PP-12

Reference: The Ontario Ministry of Energy and Electrification's Cost Effective Energy Pathways Study for Ontario (Cost Effective Energy Pathways Study for Ontario) was recently released following Enbridge's five-year gas supply plan filing.

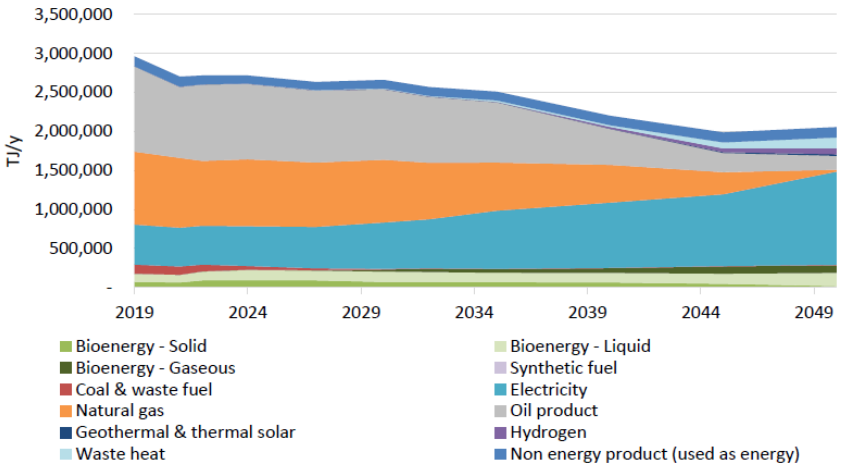


Figure ES-1. Final energy consumption (TJ/y) by fuel type from 2019 to 2050 for the NZ50 IP

a) What policy or operational issues outlined in the Provincial Pathways Study are incremental to what Enbridge considered in development of its five-year gas supply plan?

b) Did Enbridge use the Ontario pathway to emissions reductions in Figure ES-1, for any scenarios in its five-year gas supply plan? If yes, please provide the details. If no, please provide the impacts to the gas supply plan using this scenario?

c) Hydrogen and RNG are minor contributions in Figure ES-1. Does ENGLP agree with that assessment? If not, please explain why not.

6-PP-13

References:

Ontario's Energy for Generations plan (Energy for Generations | ontario.ca)

June 11, 2025 Directive to the OEB (OC-802-2025.pdf)

Directive to IESO (https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Directive-from-the-Minister-of-Energy-and-Mines-20250612-IEP.pdf)

The above-noted Provincial Energy for Generations plan and related directives has a limited focus on natural gas as compared to electrification and decarbonization of the grid in support of the Energy Transition. This could be interpreted that natural gas is currently an important and material part of Ontario's energy mix, but not a long-term future priority. Please provide Enbridge interpretation, particularly given the limited references to natural gas in these most recent policy documents.

6-PP-14

a) Please confirm that the Enbridge gas supply function manages both the regulated and unregulated gas supply functions for Enbridge. If not, please explain how each are done and coordinated.

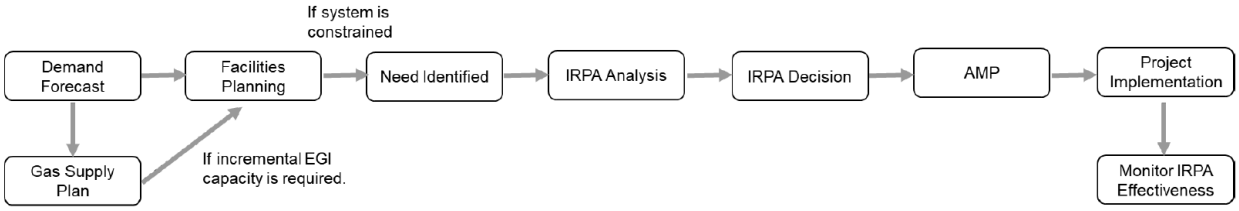
b) Please explain how the unregulated gas supply activities managed by the Enbridge gas supply function are allocated in alignment with the affiliate relationship code.

c) Is all gas supply planning (regulated and unregulated) conducted in a coordinated manner by the Enbridge gas supply function? If no, please explain which departments coordinate what pieces. If yes, please provide the full (regulated and unregulated) gas supply plan and/or strategy documents.

d) Please explain the process and timing used to separate the gas supply plan into regulated and unregulated components.

6-PP-15

Reference: EB-2020-0091 Exhibit I.Staff.2



Please confirm that this diagram is still the most recent version showing the linkage between gas supply / demand forecast and the assessment of integrated resource plan (IRP) alternatives. If there is a more recent version that differs, please provide a copy.

6-PP-16

a) Please confirm that integrated energy planning is a policy objective supported by the Province and OEB. If not, please explain.

b) Please explain how Enbridge has attempted to address integrated energy planning in the five-year gas supply plan.

c) Please explain how Enbridge has provided or considered supply-side integrated resource planning (IRP) options as part of its gas supply planning function.

d) Please provide the full menu of supply-side integrated resource planning (IRP) options Enbridge has available to apply to gas demand needs, as appropriate.

6-PP-17

Reference: To date, Enbridge Gas has supported the energy transition through the purchase of RNG, the inclusion of certified gas in the gas supply portfolio and the purchase of hydrogen through the Low Carbon Energy Project. [Page 69]

For the proposed five-year gas supply plan and the preceding five-year plan, please provide a table showing the total amount of the following and include a column to show the percentage each represents of the total annual gas supply for each year.

- Total gas supply
- RNG
- Certified gas
- Hydrogen

6-PP-18

As of March 31, 2025, Enbridge Gas has made three purchases of RNG as part of the VRNG program, procuring 5,600 GJ in total, with 2,300 GJ procured in the 2023/24 gas year. [Page 70]

a) Please provide the lifecycle emissions (tonnes CO_2e per m^3 and/or MJ) for the 2,300 GJs of RNG procured.

b) Does Enbridge plan to continue the VRNG or wind it down due to the low participation rates? If a wind down is planned, please provide the estimated timeline.

6-PP-19

Reference: Certified natural gas is conventional natural gas that has been produced to meet a specified set of standards and practices.

a) Please provide the standards and practices that are being used for the certified natural gas Enbridge is purchasing.

b) Please confirm that certified natural gas is not a gas procurement factor leading to additional costs being incurred for certified natural gas compared to regular (non-certified) natural gas. If that is not correct, please explain.

6-PP-20

Reference: The Hydrogen Blending Grid Study was initiated in 2023 and will be completed in 2026 [Page 72]

a) Which filing year does Enbridge expect to integrate any relevant outcomes from the Hydrogen Blending Grid Study into its annual gas supply plan?

b) Consideration for the appropriateness and treatment of pure hydrogen pipelines to support Ontario's net zero future is underway. Does the scope of the Hydrogen Blending Grid Study include pure hydrogen pipelines or just blending to a specific maximum percentage? If pure hydrogen pipelines are not part of the scope, please provide details on how Enbridge is assessing that scenario.

6-PP-21

Reference: Enbridge Gas submitted a revised Leave to Construct application for the Low Carbon Energy Project (LCEP) with the OEB on March 31, 2020. Following OEB approval in the fall of 2020, construction started on the associated hydrogen blending facilities. Construction and commissioning were completed in September 2021, and the plant began blending up to 2% hydrogen by volume on October 1, 2021, for approximately 3,600 customers in Markham, Ontario. [Page 71]

a) Please provide a table showing the amount and percent of hydrogen blending per year since project commissioning. If the percentage is below 2%, please explain why.

b) Enbridge estimated that the GHG reductions from the pilot project would be 97-120 tonnes of carbon dioxide equivalent (tCO2e) per year [EB-2019-0294 OEB Decision, page 1]. Please provide the actual annual lifecycle GHG emission reductions since the project was commissioned.

c) The OEB pilot project Decision [EB-2019-0294 OEB Decision, Page 15] requires Enbridge to file a pilot project report. Please provide an update on that report and if it has already been filed, please provide the filing reference.

6-PP-22

a) Based on Enbridge's five-year gas supply plans filed with the OEB, please describe what flexibility Enbridge retains to vary from the plan as filed and what elements are not open to change over the plan term.

b) Please describe how the input and process for the annual review of the Enbridge five-year gas supply plan has impacted how Enbridge develops and executes the gas supply function.

c) Please describe how gas supply planning (and the gas supply plan) is conducted differently under the merged utility vs. legacy Enbridge Gas and Union Gas. Please include a list of any improvements and cost efficiencies that have been gained through the consolidated approach.

6-PP-23

Reference: The first step in the annual gas supply planning process is the update to the annual and design day demand forecasts that occurs from April to July each year. Updating the demand forecasts requires an in-depth analysis that focuses on key factors impacting demand including customer growth, normalized weather, design day requirements, customer consumption patterns, and economic outlooks. [Page 10]

a) For each element required to develop the demand forecasts, please indicate the source of the information. If it is an internal Enbridge source, please indicate which department it comes from and the process used.

b) Is the annual and design day forecasts a grass-roots exercise of simply updating elements of the previous forecast.

6-PP-24

Reference: Table 3, Page 23.

Please provide a copy of Table 3 with a column to include corresponding peak design day temperatures.

6-PP-25

Reference: On design day, the interruptible demand is curtailed. [Page 23]

Please provide the total curtailment removed (per delivery area and total for the system) and what that represents as a percentage of the total demand.

6-PP-26

Reference: These updates to the Plan typically occur from July to August each year and result in an operational version of the Plan for the upcoming winter that receives internal senior management review and approval. [Page 10]

a) Please explain the annual process used for senior management approval.

b) Please provide a copy of the materials used to gain senior management approval for this current five-year gas supply plan.

c) Please confirm that Enbridge still agrees with May 1 as the annual filing date for the gas supply plan. If not, please explain what Enbridge proposes and why.