From:	Office of the Registrar
To:	Zulma DeBonis
Subject:	Redacted - Letter of Comment Submitted: EB-2025-0163
Date:	Wednesday, August 13, 2025 11:20:03 AM

From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Wednesday, August 13, 2025 11:06 AM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: Webmaster <Webmaster@oeb.ca>
Subject: Redacted - Letter of Comment Submitted: EB-2025-0163

LETTER OF COMMENT

Comments:

I am writing as an Enbridge Gas customer to oppose Enbridge Gas Inc.s requested 2026 rate increases in EB-2025-0163. The proposal would raise a typical residential customers bill by roughly 31 to 46 dollars per year in 2026 depending on service area. My concerns are as follows: 1. Affordability and cumulative bill impacts: Even modest annual increases compound. Enbridges own application shows an average residential customer facing an additional 31 to 46 dollars in 2026 alone. For many households already coping with higher shelter, food, and borrowing costs, this is material. The Board should scrutinize every driver of this increase and require stronger cost-containment before approving any rise in distribution charges. 2. Operating cost growth and accounting shifts: Enbridge proposes a 50 million dollar reclassification from capital to operating expenses in 2026. Moving spending out of capital and into operating costs, which are recovered more quickly from ratepayers, can accelerate cost recovery and inflate near-term rates. The Board should require detailed justification and consider disallowance or phasing unless Enbridge demonstrates clear customer benefit and necessity. 3. Price Cap Index mechanics for 2026: Enbridges proposed Price Cap Index is 3.51 percent, based on inflation of 3.79 percent less a stretch factor of 0.28 percent. Given ongoing productivity opportunities including technology, field operations, and shared services efficiencies, the requested stretch factor appears conservative. A higher stretch factor or targeted cost disallowances would better align incentives with customer affordability. 4. Z-Factor treatment of the federal carbon charge change: Enbridge seeks Z-Factor treatment related to the elimination of the Federal Carbon Charge on natural gas used to generate electricity, producing a 14.024 million dollar revenue requirement impact and a 0.49 percent proportional rate effect. Z-Factors are intended for extraordinary, exogenous events. The Board should test whether Enbridge has fully netted offsets and whether standard mechanisms already capture much of this change before allowing Z-Factor recovery. 5. Profits and financial capacity: While I recognize that utility rates are set on the regulated utilitys cost-of-service and not the parents consolidated profit, Enbridge Inc.s strong earnings underscore overall financial capacity to manage costs without leaning on further bill increases. Net income consolidated Enbridge Inc.: - 2022: 2,938 million CAD - 2023: 6,058 million CAD - 2024: 5,631 million CAD In addition, Enbridge reports that its Gas Distribution and Storage business, which includes Enbridge Gas Ontario, saw higher adjusted EBITDA year-over-year in 2024 with a noted weather headwind of about 58 million CAD for Enbridge Gas Ontario. This suggests room for productivity and efficiency to shoulder more of the burden before customers are asked to pay more. Requests to the Board: 1. Reject or materially reduce the proposed 2026 distribution rate increase for residential customers 2. Tighten the stretch factor or impose targeted disallowances where evidence of efficiency gains is lacking 3. Deny or

phase the 50 million dollar shift from capital to operating costs unless Enbridge proves clear, quantifiable customer benefits 4. Apply rigorous netting to the requested Z-Factor so customers are not charged for impacts already offset elsewhere 5. Require enhanced reporting on cost controls and efficiency programs for 2026 so savings, not higher rates, fund routine operations Thank you for your consideration and for protecting ratepayers interests.

Name: Troy Dube

Do you reside in the impacted service area?: Yes