

# Elson Advocacy

August 14, 2025

**BY RESS**

**Mr. Ritchie Murray**  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700, P.O. Box 2319  
Toronto, Ontario M4P 1E4

Dear Mr. Murray:

**Re: Enbridge – Five-Year Gas Plan  
EB-2025-0065**

Enclosed please find the interrogatories of Environmental Defence in the above matter.

Yours truly,



Kate Siemiatycki

cc: Parties in the above proceeding

**EB-2024-0067**  
**Enbridge Gas Five-Year Gas Supply Plan**

**Interrogatories of Environmental Defence**

**Question # 2-ED-1**

Reference: Tables 1, 4

Questions:

- (a) Please provide the historical and forecast consumption per customer from 2010 to 2045 (or as far out as possible) for residential, commercial, industrial, and power sector customers.
- (b) Please provide a table showing the historical and forecast number of customers from 2010 to 2045 (or as far out as possible) for each customer type (residential, commercial, industrial, and power sector).

**Question # 2-ED-2**

Reference: Figure 3, Tables 1, 4

Questions:

- (a) Please file a copy of all of Enbridge's long-range gas demand and gas consumption forecasts. Please include Enbridge's 20-year forecast.
- (b) Please provide a table with the numbers underlying Figure 3. Please also provide those figures in m3 instead of PJ.
- (c) Please provide a table comparing Enbridge's gas demand and consumption forecasts with the one in Figure 3.

**Question # 3-ED-3**

Reference: Section 4.2, p. 18

Preamble:

Enbridge identifies a number of risks associated with the general service annual demand forecast in section 4.2. The following question is meant to understand some of the impacts of gas demand projections on Enbridge's planning. We are not asking Enbridge to accept or opine on the assumption.

Questions:

- (a) How important is it to have an accurate forecast of annual and peak demand for gas supply planning? Please explain the degree to which an accurate forecast helps Enbridge minimize the cost of gas supplied to its customers, and why.
- (b) If the actual gas demand forecasts were 10% less than forecast (weather corrected), would that potentially mean that customers would pay unnecessarily high prices for gas (e.g. by entering into long-term contracts that were not necessary)?
- (c) Please identify the elements of Enbridge's proposed Gas Supply Plan that would be different if the gas demand forecasts were 10% lower.
- (d) If gas demand decreased by 10%, what percentage impact would that have on the price of gas in Ontario? (The impact will be very small in percentage terms but can be calculated.) Please provide an answer on a best-efforts basis.

#### **Question # 2-ED-4**

Reference: Tables 1, 2

Questions:

- (a) Please provide all demand forecasts for the 2024/25 to 2029/30 period that have been calculated in support of, or as part of Enbridge's capital planning, including the EGI Assessment Management Plan 2025-2034.
- (b) Please compare and contrast any figures identified above with the demand forecasts outlined in the Gas Supply Plan.

#### **Question # 2-ED-5**

Reference: Tables 1, 2, 3, 23, 26

Preamble:

Table 1 shows an average annual decrease in forecasted demand of .4% from 2024/25 to 2029/30. Table 2 shows a decrease in forecasted annual demand for sales service customers over the same six-year forecast period. By contrast, Table 4 asserts an increase in design day demand forecast over that period, resulting in related supply shortfalls.

Questions:

- (a) Please explain how forecasted design day demand increases over the forecast period while average annual demand decreases.
- (b) Enbridge reported that actual unutilized capacity in 2022/23 and 2023/24, was higher than initial forecasts. This was attributed to warmer than normal weather. During the same period, planned HDD was higher than the actuals. How are these trends accounted for in the current analysis of forecasted design day demand?

## **Question # 2-ED-6**

Reference: Section 5.1, pp 31-32

Preamble:

Enbridge identifies potential changes in transportation contract length due to market trends and anticipated contract expiries. Environmental Defence seeks to understand the proportion of short vs. long-term contracts used by Enbridge.

Questions:

To the best of Enbridge's ability:

- (a) Please provide a breakdown of Enbridge's current and planned transportation contracts based on contract length.
- (b) Please provide a breakdown of Enbridge's current and planned gas supply contracts based on contract length.

## **Question # 2-ED-7**

Reference: Table 22

Preamble:

Enbridge identifies a link between the Gas Supply Plan and future leave to construct applications. The following questions are intended to explore the connection, if any, between gas supply planning and capital development.

Questions:

- (a) Please identify any infrastructure investments that are likely to flow from the gas supply plan over the next ten years. For any that have been identified, please list the cost and provide a supply/demand excess/shortfall table.
- (b) Is Enbridge expecting to propose any upgrades to the Dawn-Parkway system that it would apply for between now and 2035?
- (c) Please provide a table showing any Dawn-Parkway expansion projects that Enbridge is currently planning within its capital planning horizon. Please include columns for forecast cost, application date, in-service date, and capacity.
- (d) If the design day demand forecasts set out in the Plan were flat or decreasing, could any projects in Enbridge's latest AMP be deferred? If yes, please indicate which and explain why for each
- (e) Are there any projects in Enbridge's AMP that could be addressed through different gas supply options instead of infrastructure investments? If yes, please indicate which and identify each.

### **Question # 2-ED-8**

Reference: Section 6.1, p. 64

Preamble:

Enbridge identifies current trade disputes with the United States as an important global policy development, with potential impacts on gas supply planning. The following questions are aimed at understanding the proportion of current and planned gas supply that is procured from the United States.

Questions:

- (a) Please provide a break-out of the percentage of gas supply between 2023-24 and 2029-30 that was/is planned to be extracted in the U.S., Alberta, Saskatchewan, and B.C. Please also provide the figures in m3. Please make estimates and assumptions as needed.
- (b) Please provide a break-out of the percentage of gas supply between 2023-24 and 2029-30 that was/is planned to enter Ontario from the United States. Please also provide the figures in m3. Please make estimates and assumptions as needed.

### **Question # 2-ED-9**

Reference: Appendix A, Market Outlook, pp. 9-13

Preamble:

Enbridge indicates that capacity on the TCPL mainline is scarce. Environmental Defence seeks to examine where capacity bottlenecks are arising.

Questions:

- (a) Approximately 5-10 years ago, there was considerable capacity on the TC mainline. Please discuss what has changed and when that changed.
- (b) Please provide a table showing for each year in the past 15 years (i) the available capacity for TC mainline deliveries to Ontario and (ii) the supply on the TC mainline contracted for Ontario deliveries.
- (c) Is the lack of capacity for the TC mainline to bring gas into Ontario due to increased deliveries in Ontario or increased deliveries upstream of Ontario?
- (d) What, if any capacity would be available on the segments of the TC mainline in Ontario assuming there was capacity on the segments of TC leading to the Ontario border. This question is intended to explore the degree to which the TC mainline limits are due to upstream bottlenecks.
- (e) What quantity and percent of the gas purchased at or arriving at Dawn at some point flows through the TCPL mainline before passing into the United States via other routes, including the Northern Border Pipeline and Great Lakes Gas Transmission on the way to Dawn?

- (f) Could contracts for delivery of gas at Dawn that originates from the WCSB and travels through the TC mainline and then via US pipelines for delivery at Dawn be switched to delivery via the TC mainline via long-haul? Please explain.
- (g) Please provide a forecast of the capacity for incremental TC mainline deliveries to Ontario for each year in the gas supply plan term.
- (h) If capacity were to come available on the TC mainline during the Plan term, would Enbridge contract for that supply (e.g. to avoid the potential for a Dawn-Parkway expansion to be needed). Please explain why or why not.

## Question # 2-ED-10

Reference: Section 6.3, p. 71

Preamble:

Certified Natural Gas (“CNG”) made up roughly 4.5% of the total gas supply in 2023/24. Enbridge asserts that there are no plans to increase investments in CNG.

Question:

- (a) Please confirm whether Enbridge plans to maintain the current level of CNG supply as part of its portfolio in the next six years.
- (b) Please provide a table listing the CNG certification options and the climate change criteria for each (e.g. GHG intensity).
- (c) Please provide a table showing (i) the upstream emissions from non-CNG gas on average (tonnes CO<sub>2</sub>e/m<sup>3</sup>) and (ii) the maximum upstream emissions from CNG to qualify for each of the CNG certification schemes (tonnes CO<sub>2</sub>e/m<sup>3</sup>). We are attempting to get a concrete understanding of the environmental benefits of CNG certification options.
- (d) For each of the CNG options, please express the cost as dollars per tonne of avoided CO<sub>2</sub>e, with the comparator being the average embedded CO<sub>2</sub>e emissions from gas. The difference will presumably arise due to avoided CO<sub>2</sub>e arising from extraction and leaks.
- (e) If Enbridge is procuring gas and has the option of choosing between gas certified under different certification labels, how will Enbridge choose between them when cost is not a factor?
- (f) Over the past five years, has Enbridge referred to certified natural gas, sustainable natural gas, responsible natural gas, or other synonyms in its promotional materials? If yes, please provide a copy of said materials.
- (g) Does Enbridge intend to refer to certified natural gas, sustainable natural gas, responsible natural gas, or other synonyms in its promotional materials (e.g. as being relevant to social or environmental responsibility)?
- (h) Would Enbridge commit to refrain from citing CNG in its promotional materials?
- (i) If Enbridge will not commit to (h), would it commit to only discuss CNG in promotional materials while also making reference to its limitations in equally large text (e.g. the lack of attributable GHG emissions reductions)?