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BY EMAIL

August 14, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Mr. Murray:

**Re: Enbridge Gas Inc.
Five-year Gas Supply Plan
OEB Staff Interrogatories
OEB File Number: EB-2025-0065**

In accordance with Procedural Order No. 1, please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding. The applicant has been copied on this filing.

Enbridge Gas's responses to interrogatories are due by September 4, 2025.

Any questions relating to this letter should be directed to the Case Manager, Catherine Nguyen at catherine.nguyen@oeb.ca or at 416-440-7645. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Catherine Nguyen
Case Manager

Encl.

c: EGIRegulatoryProceedings@enbridge.com
David Stevens, Aird & Berlis LLP

**OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2025-0065**

Please note, Enbridge Gas Inc. is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

2-Staff-1

Reference: Decision on Issues List, Schedule A: Approved Issues List, Issue 7

Question(s):

- a) Has Enbridge Gas considered filing its gas supply plans with the OEB prior to the start of the gas year to ensure that regulatory and stakeholder input can inform Enbridge Gas's gas supply planning in advance of key gas supply planning decisions? Please explain why or why not.
- b) Please discuss any implications, if any, if Enbridge Gas were to file its gas supply plans with the OEB prior to the start of the gas year.

4.2-Staff-2

Reference: 4.2 Annual Demand, General Service Market Risk Analysis, pg. 18

Preamble:

Enbridge Gas stated the general service annual demand would be affected by approximately 0.4% higher/lower if the real natural gas price is 10% higher/lower than forecast.

Enbridge Gas stated that the annual demand forecast considers the carbon levy within the forecast natural gas price used in forecasting non-residential average use. Without the carbon levy, the forecast natural gas price would have been 30-40% lower.

Question(s):

- a) Please describe whether and how the removal of the federal carbon charge will necessitate any changes to Enbridge Gas's gas supply plan (i.e. adjustments to contract volumes, storage utilization or upstream transportation arrangements).

4.2-Staff-3

Reference: 4.2 Annual Demand, Annual Demand Forecast, pg. 19

Preamble:

In explaining its annual demand forecast, Enbridge Gas noted that the general service market demand is forecast to decline on average by approximately 0.5%. By contrast, contract market demand is forecast to remain relatively stable, increasing slightly for the EGD and Union South rate zones due to customer growth.

Question(s):

- a) Please confirm that the contract market demand forecast takes into account the ongoing trade issues between United States and Canada.
- b) Did Enbridge Gas contact its contract customers after the recent announcement of tariffs by the United States to confirm whether the forecasted consumption or demand has changed? If not, does Enbridge Gas intend to contact some of its contract customers that are likely to be significantly impacted by the ongoing tariffs (auto production, steel and aluminum etc.) to confirm their natural gas demand? Please provide a detailed response.

4.4-Staff-4

Reference: 4.4 Design Day Demand, Design Day Demand Forecast Changes, pg. 24

Preamble:

Enbridge Gas stated that its design day demand forecast incorporates historical design day use per customer trends for existing general service customers, which reflects observed DSM consumption savings, process or behavioural changes and general service customer growth (including ET adjustments).

Question(s):

- a) Please clarify what Enbridge Gas means by “process or behavioural changes”. Please explain how it is measured and observed and how Enbridge Gas incorporates it into the design day demand forecast.

5-Staff-5

Reference: 5. Portfolio Overview, Scarcity of Existing Pipeline Transportation Capacity, pg. 30

Preamble:

In its evidence, Enbridge Gas referenced the 2023 and 2024 annual updates where it noted that the scarcity of transportation capacity on the TCPL mainline had become a significant consideration when evaluating transportation alternatives. The scarcity of transportation capacity on the TCPL mainline continues to be a concern, and Enbridge Gas has observed that available capacity has become scarce on several other transportation paths as well.

Question(s):

- a) Please outline the steps that Enbridge Gas has taken to address the shortage of transportation capacity on the TCPL mainline. Please provide a response under different durations: (1) short-term measures and (2) medium to long-term measures.

5.2-Staff-6

Reference: 5.2 Transportation Portfolio Changes, pp. 36-44
Appendix A, Transportation Market Overview, pg. 9

Preamble:

Enbridge Gas stated that existing transportation capacity to Dawn and Enbridge Gas delivery areas has become increasingly scarce since Enbridge Gas filed its last 5-year Gas Supply Plan. Enbridge Gas stated that it has the potential to constrain its ability to ensure adequate supply deliveries to its system to meet the design demands of customers in the future.

For a number of Enbridge Gas's transportation portfolio changes, Enbridge Gas noted that transportation capacity is fully contracted and if Enbridge Gas were to reduce contract levels, it would be unlikely to be able to recontract in the foreseeable future.

Question(s):

- a) Please explain how Enbridge Gas manages and assesses the risk associated with the potential inability to renew transportation contracts on fully contracted transportation pipelines.
- b) Please explain how the scarcity of existing transportation capacity affects Enbridge Gas's decisions regarding the length of transportation contracts.

5.2-Staff-7

Reference: 5.2 Transportation Portfolio Changes, Rationale for Vector Renewal, pg. 41

Preamble:

In its evidence, Enbridge Gas has explained that capacity on the Vector pipeline to Dawn provides a competitively priced, reliable and flexible transportation option that offers supply diversity at Chicago as well as access to additional supply along the Vector pipeline route, and also provides an important secondary benefit of maintaining Enbridge Gas's ability to serve the Sarnia Industrial Line. This capacity also provides the additional benefit of providing Enbridge Gas the option to deliver to Michigan storage.

Question(s):

- a) Please explain what "the option to deliver to Michigan storage" means. Does it mean delivering to some third party or Enbridge Gas storing its own gas at the Michigan storage facility?
- b) Has Enbridge Gas previously stored gas transported on the Vector pipeline in storage facilities at Michigan? If yes, please provide quantities, the number of occasions that gas was moved to Michigan storage in the past three years and the number of days that gas was stored on each occasion.
- c) What has Enbridge Gas usually done with the natural gas that was stored in Michigan? Has it been sold to third parties in Michigan or moved to Ontario for distribution or storage at Dawn?
- d) Why would Enbridge Gas store gas in Michigan as opposed to moving it to Dawn?

5.5-Staff-8

Reference: 5.5 Commodity Portfolio, Table 10, pg. 50

Preamble:

Enbridge Gas provided its annual demand sources of supply at Table 10 for each rate zone over the forecast period 2024/25 to 2029/30.

Question(s):

a) What factors contribute to the declining supply from Dawn and WCSB observed over the forecast period, particularly in the EGD and Union South rate zones?

5.6-Staff-9

Reference: 5.6 Design Day Supply/Service Option Analysis, pp. 52-54
EB-2024-0067, 2024 Annual Update, 5.1 Design Day Analysis, pp. 50-52

Preamble:

OEB staff has reproduced below the supply/service option evaluation matrix for the Enbridge CDA and Enbridge EDA filed in Enbridge Gas’s current five-year GSP vs. Enbridge Gas’s 2024 annual update.

Enbridge CDA

5 Year GSP:

Option	Reliability	Flexibility	Diversity	Costs (\$ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟡	🟡	🟢	121.74	~3%	No (1)
Short-haul: D-P	🟢	🟡	🟡	38.79	<1%	No
Short-haul: Dawn	🟢	🟡	🟡	23.46	<1%	No
Short-haul: Niagara	🟡	🟡	🟡	28.30	<1%	No (2)
Third-Party	🔴	🔴	🟢	29.05	<1%	Unknown

2024 Annual Update:

Option	Reliability	Flexibility	Diversity	Costs (\$ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟢	🟡	🟢	32.22	<1%	No
Short-haul: D-P	🟢	🟡	🟡	9.35	<1%	No
Short-haul: Dawn	🟢	🟡	🟡	5.38	<1%	No
Short-haul: Niagara	🟡	🟡	🟡	6.59	<1%	No
Third Party	🟡	🔴	🟢	4.44	<1%	Unknown

Enbridge EDA

5 Year GSP:

Option	Reliability	Flexibility	Diversity	Costs (\$ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟢	🟢	🟡	7.97	<1%	No
Short-haul: D-P	🟢	🟡	🟡	4.05	<1%	No
Short-haul: Niagara	🟡	🟡	🟢	3.75	<1%	No
Short-haul: Iroquois	🟡	🟡	🟢	2.70	<1%	No
Third-Party	🟡	🔴	🟢	2.02	<1%	Unknown

2024 Annual Update:

Option	Reliability	Flexibility	Diversity	Costs (\$ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟢	🟡	🟡	12.99	<1%	No
Short-haul: D-P	🟢	🟡	🟡	6.22	<1%	No
Short-haul: Niagara	🟡	🟡	🟢	5.72	<1%	No
Short-haul: Iroquois	🟡	🟡	🟢	3.25	<1%	No
Third-Party	🟡	🔴	🟢	1.75	<1%	Unknown

Question(s):

- c) For the Enbridge CDA, please explain the significant increase in costs for each option from Enbridge Gas’s 2024 annual update.
- d) For the Enbridge CDA, please explain why the reliability of the long-haul option has decreased from Enbridge Gas’s 2024 annual update.
- e) For the Enbridge EDA, please explain why the flexibility of the long-haul options has increased from Enbridge Gas’s 2024 annual update.
- f) Please describe any key changes to Enbridge Gas’s supply/service options since the filing of its last five-year GSP with the OEB.

6.1-Staff-10

Reference: 6.1 Global Policy Developments, United States Trade Policy, pg. 64

Preamble:

Enbridge Gas stated that Canadian origin natural gas imports into the U.S. from Canada fall within the USMCA exemption and are not subject to tariffs.

Enbridge Gas’s gas supply plan uses U.S. located pipelines to transport and import gas originating in the U.S. to Canada. Enbridge Gas stated that should Canada impose retaliatory tariffs on U.S. origin natural gas imports, the costs of the plan could be impacted by the imposition of Canadian tariffs.

Enbridge Gas further stated that should the plan be impacted by tariffs in the future, it would record the incremental cost in the respective purchase gas variance account and seek recovery of the costs through future QRAMs.

Question(s):

- a) What volume of gas currently transported through U.S. pipelines under Enbridge Gas’s gas supply plan would be subject to any Canadian imposed tariffs? Please also identify it as percentage of total supply.

- b) Please describe any alternative supply routes that Enbridge Gas has considered to mitigate any potential tariff-related cost increases.
- c) Please describe further how Enbridge Gas would record and recover the incremental costs associated with tariffs through the purchase gas variance accounts.
- d) What criteria will Enbridge Gas use to determine whether tariff-related cost impacts warrant an adjustment to the execution of the gas supply plan?

6.1-Staff-11

Reference: 6.1 Global Policy Developments, Ontario, pg. 66
[Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7](#)

Preamble:

In June 2025, the Ontario government released its Integrated Energy Plan – “Energy for Generations: Ontario’s Integrated Plan to Power the Strongest Economy in the G7”.

Question(s):

- a) How does Enbridge Gas intend to incorporate the objectives, priorities, and direction outlined in the Integrated Energy Plan into its current and future gas supply planning.
- b) Please discuss whether the Integrated Energy Plan has any implications to the assumptions, supply/service options or contracting strategies in Enbridge Gas’s five-year GSP. Please explain how Enbridge Gas plans to address these implications.

6.2-Staff-12

Reference: 6.2 Gas Supply Impacts on Avoided Facilities, pp. 66-68
2.1 Introduction, pp. 5-6

Preamble:

Enbridge Gas provided examples of Enbridge Gas transmission system infrastructure that has been avoided or reduced (i.e. in terms of scope) as a result of gas supply contracting.

Question(s):

- a) Does Enbridge Gas incorporate consideration of potential facility benefits of this nature when making its gas supply decisions, or are these incremental impacts that Enbridge Gas would consider to be outside of its gas supply planning principles and practices regarding cost-effectiveness and reliability and security of supply? If the former, please describe how these benefits are taken into consideration.

6.2-Staff-13

Reference: 6.2 Gas Supply Impacts on Avoided Facilities, pg. 67

Preamble:

Enbridge Gas noted that it files an updated Asset Management Plan with the OEB, where it outlines all forecasted capital projects/expenditures, including future transmission system expansion projects.

Question(s):

- a) Does the most recent version of Enbridge Gas's Asset Management Plan include any future transmission system expansion projects? If so, does Enbridge Gas expect that its approach to gas transportation arrangements and gas contracting described in this gas supply plan will have any impact (positive or negative) on the likely need for these expansion projects, and the future potential for supply-side alternatives to address these needs? Please describe as needed.

6.3-Staff-14

Reference: 6.3 Lower Carbon Energy in the Gas Supply Portfolio, Certified Natural Gas, pg. 71

Preamble:

Enbridge Gas stated that it procures certified natural gas as part of the gas supply commodity portfolio, however, does not pay a premium to include certified natural gas in the gas supply and currently does not have a strategy to actively increase procurement of certified gas.

Question(s):

- a) Please explain why Enbridge Gas does not currently have a plan to increase procurement of certified gas.

8-Staff-15

Reference: 8 Gas Supply Plan Execution, pg. 78
8.1 Procurement Process and Policy, pg. 79

Preamble:

Enbridge Gas stated that to enable such flexibility to adjust from the supply procurement strategy quickly, Enbridge Gas reserves a portion of the gas supply identified in the gas supply plan for short-term (e.g., prompt month) contracts whereas the remaining portion is contracted prior to the season via a variety of annual, and seasonal contracts.

Enbridge Gas also stated that the gas supply for all rate zones is purchased using both fixed and indexed price contracts.

Question(s):

- a) What proportion of the total gas supply portfolio does Enbridge Gas reserve for short-term contracts vs. contracted via annual and seasonal contracts?
- b) Please describe the criteria and methodology Enbridge Gas uses to determine the appropriate portion of gas reserved for short-term contracts vs. that contracted via annual and seasonal contracts.
- c) What proportion of the total gas supply portfolio does Enbridge Gas procure under fixed price contracts vs. indexed price contracts?
- d) Please describe the criteria and methodology Enbridge Gas uses to determine the appropriate portion of gas procured under fixed price contracts vs. indexed price contracts.

11-Staff-16

Reference: 11 Performance Measurement, pg. 85
Appendix E: 2023/2024 Performance Metrics

Preamble:

In response to the OEB staff recommendations regarding Enbridge Gas's 2024 annual update, Enbridge Gas has attributed a target or variance range to certain performance metrics.

"Reference Price" and "Instances when QRAM expected bill impacts exceed +/-25%" were not attributed a target or variance range.

Question(s):

- a) Please provide further details on how Enbridge Gas determined the single-value targets and variance ranges assigned to the performance metrics. Please include any documents to support the calculations.
- b) Please explain whether there are any consequences if Enbridge Gas fails to meet a performance metric.
- c) Please explain further why Enbridge Gas does not consider it appropriate to attribute a target or variance range to the “Instances when QRAM expected bill impacts exceed +/-25%”.

11-Staff-17

Reference: 11 Performance Measurement, 2023/24 Performance Metrics Results, pg. 86
Appendix E: 2023/2024 Performance Metrics

Preamble:

The 2023/24 performance metric “Reliability” result for “Number of days of failed delivery of supply (including force majeure)” of 237 days fell above the calculated variance range of 18 – 178 days.

Question(s):

- a) Please describe the primary causes that contributed to the elevated number of failed delivery days and how Enbridge Gas responded to the instances of failed delivery.
- b) Please describe the changes and improvements Enbridge Gas is considering to reduce the number of failed delivery days in future planning years.