



August 14, 2025

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Acting Registrar

Dear Mr. Murray,

Re: Enbridge Gas Inc. ("EGI")
Application to review 5-year gas supply plan
Board File No.: EB-2025-0065

We are counsel to Three Fires Group Inc. ("**TFG**") and Minogi Corp. ("**MC**") in the above-noted proceeding. Please find attached the interrogatories from TFG and MC to EGI, pursuant to Procedural Order No. 1.

Sincerely,

DT Vollmer

c. Reggie George, TFG
Don Richardson, MC

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15 (Schedule. B);

AND IN THE MATTER OF Enbridge Gas Inc. application to
review 5-year Natural Gas Supply Plan.

EB-2025-0065

INTERROGATORIES

OF

THREE FIRES GROUP INC.

(“TFG”)

AND

MINOGI CORP.

(“MC”)

August 14, 2025

Question: 2-TFG/MC-1

Reference:

- Enbridge Gas Inc.'s ("**EGI**") 5-Year Gas Supply Plan (the "**GSP**"), section 6
- Enbridge Inc.'s Indigenous Peoples Policy ("**IPP**")
- Enbridge Inc.'s Indigenous Reconciliation Action Plan ("**IRAP**")
- 1-GFN-1

Preamble: In section 6 of the GSP, EGI provides how the GSP was developed in support of and in alignment with public policy.

- a) Please define the criteria EGI used to determine what constitutes relevant "public policy" for purposes of the GSP.
- b) Please confirm whether "public policy", as used in the GSP, includes Indigenous reconciliation and/or Indigenous economic development. If yes, please identify where in the GSP EGI considered Indigenous reconciliation and/or Indigenous economic development. If not, explain why not and provide EGI's rationale.
- c) Please provide any internal guidance EGI used to determine whether First Nations perspectives should inform development of the GSP.
- d) Please identify and/or discuss any feedback received from First Nations as part of developing the GSP and indicate how it influenced the GSP. If no feedback was provided, please explain why not.
- e) Please also include as part of your response to 1-GFN-1 h) and i) the same information particular to (i) Chippewas of Kettle and Stony Point First Nation and (ii) Mississaugas of Scugog Island First Nation.

Question: **2-TFG/M-2**

Reference: • GSP, pp. 69

Preamble: EGI notes RNG is a lower-carbon fuel that will play a role in Ontario's energy transition.

- a) Please discuss EGI's RNG procurement plans over the GSP period.
- b) Please confirm whether EGI will consider and/or prioritize RNG supplied by Ontario producers. In your response, please discuss the availability of RNG produced in Ontario for EGI's customers.
- c) Please discuss any RNG-related expressions of interest, proposals, or partnership approaches received by EGI from First Nations or Indigenous-owned entities over the previous 5-year gas supply period and/or that EGI considered in preparing the GSP.
- d) Please explain why potential Indigenous-led RNG projects, including any discussions or proposals from Ontario First Nations, were not included in the GSP section on RNG.
- e) Provide any internal assessments or analyses considering Indigenous participation in RNG development over the GSP 5-year planning horizon.

Question: 2-TFG/M-3

Reference: • GSP, pp. 71

Preamble: EGI indicates that it supports the goals of certified natural gas (“**CNG**”) and suppliers implementing practices to lower emissions and achieve environmental, social and governance (“**ESG**”) goals.

EGI notes that it procures CNG as part of the gas supply commodity portfolio but does not have a strategy to actively increase procurement of CNG. The proportion of certified natural gas of the total 2023/24 gas supply portfolio was 4.5%.

- a) Please provide the certification frameworks and schemes under which EGI has procured CNG.
- b) Has EGI assessed whether CNG certification frameworks are consistent with policy documents such as the IPP and IRAP? As part of your response, please indicate and provide details regarding (i) whether any of the certification frameworks identified in a) above include recognition of the rights of Indigenous Peoples, Indigenous reconciliation, and/or adhere to the principle of free, prior and informed consent (“**FPIC**”) as certification or eligibility requirements and (ii) the total proportion of CNG procured under such framework(s).
- c) What is the availability of CNG produced in Ontario for EGI’s customers in Ontario?
- d) Please explain EGI’s rationale for not developing an CNG procurement strategy and how that aligns with the GSP’s public policy objectives.
- e) If EGI were to develop a CNG procurement strategy, please discuss whether EGI can and/or would consider setting targets for procuring CNG from Indigenous-owned suppliers.
- f) Please explain and provide examples related to CNG what is meant by “achieve [ESG] goals”.
- g) Please provide any ESG or social co-benefit criteria that have been used when selecting CNG suppliers and whether Indigenous participation or other Indigenous-related metrics and considerations form part of EGI’s supplier evaluation.

Question: 4-TFG/M-4

Reference:

- GSP, p. 71
- EB-2024-0111, Decision and Order (the “**Decision**”), pp. 25-26, 34
- GSP, Appendix E.

Preamble: Phase 2 of Enbridge Gas’s 2024 Rebasing Application includes a Lower-Carbon Voluntary Program (“**LCVP**”) proposal to procure lower-carbon energy, with a focus on RNG, as part of the gas supply commodity portfolio beginning in 2026. EGI notes that if approved by the OEB, this program will replace the existing VRNG program.

In the OEB’s Decision and Order in the Phase 2 rebasing proceeding, the OEB granted permission to EGI to establish a voluntary program to buy RNG and sell it to large volume customers on a voluntary basis but denied the request to use its small business and residential customer base to provide a financial backstop for the voluntary program.

The OEB also acknowledged that reconciliation is important and ongoing and the Indigenous Participation Proposal for RNG procurement would contribute to that.

- a) Please provide any updates to the GSP, generally, and section 6.3 of the GSP, specifically, as a result of the Decision.
- b) Please discuss how the Decision impacts the LCVP proposal and whether EGI intends to establish the LCVP or any other RNG procurement program.
- c) If EGI intends to establish the LCVP, please provide EGI’s current position on the implementation of the Indigenous Participation Proposal set out in the Decision. If EGI does not intend to establish the LCVP, please indicate whether EGI will consider implementing the Indigenous Participation Proposal and/or incorporate Indigenous economic reconciliation objectives as part of any procurement of RNG.
- d) In the event that EGI adopts the Indigenous Participation Proposal, please discuss whether there are any reasons and/or barriers to EGI including a corresponding metric in its performance metrics in Appendix E. Please include EGI’s opinion on whether tracking EGI’s performance related to RNG procurement from Indigenous-owned entities and First Nations would be helpful for EGI and its stakeholders. If EGI does not believe it would be helpful or useful for EGI and/or stakeholders, please explain why not.

Question: **5-TFG/M-5**

Reference: • EB-2024-0067, OEB Staff Report, pp. 40-41

Preamble: OEB staff noted that having an adjudicative process to review EGI's next five-year GSP would allow the OEB to consider whether any specific First Nations concerns need to be addressed in subsequent annual updates.

- a) Please summarize all First Nations concerns EGI was aware of while developing the GSP and in relation to its previous gas supply plan, including any concerns raised by the Indigenous Participants of the Indigenous Working Group.
- b) Would EGI consider including in each Annual Update a dedicated "First Nations Considerations" section that, for example: (i) lists adjudicative directions related to First Nations, and (ii) states EGI's response/status? If no, please discuss why not.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
14th day of August, 2025



Lisa DeMarco
Resilient LLP
Counsel for TFG and MC



DT Vollmer
Resilient LLP
Counsel for TFG and MC