

September 4, 2025

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**VIA RESS**

Mr. Ritchie Murray, Acting Registrar  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON, M4P 1E4

Dear Mr. Murray:

**Re: EB-2025-0073 – Enbridge Gas Inc. (EGI) Mississauga Reinforcement Project Leave to Construct**

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**Industrial Gas Users Association (IGUA) Submissions**

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We write as counsel to IGUA to provide brief written submissions in support of EGI's application for leave to construct the Mississauga Reinforcement Project.

As noted in our (late) intervention request letter dated July 3, 2025, one of the EGI customers for whom the proposed expansion has been developed – Petro-Canada Lubricants Inc. (PCLI) – is an IGUA member. The proposed expansion supports PCLI's decarbonization and other emission reduction initiatives, while respecting the beneficiary pays principle. These are two broader principles which IGUA has consistently supported.

The record supporting this project indicates that:

1. The project is requested, and will be fully funded, by the 3 customers (including PCLI) for whom it is being built to serve.<sup>1</sup>
2. The use of incremental natural gas by these customers provides environmental benefits through displacement of less environmentally friendly fuel. In PCLI's case, switching to natural gas is specifically required in accord with PCLI's plan to comply with pending SO<sub>2</sub> emission limits and to reduce GHG and particulate emissions.<sup>2</sup>

As IGUA has consistently advocated, in the case of large volume industrial gas customers the adoption or expansion of natural gas as a fuel source and/or process input is often a cost effective decarbonization/emission reduction strategy. In such cases, *increasing* gas use can *decrease* environmentally harmful emissions, while controlling or even reducing input costs for these trade exposed industrials.

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<sup>1</sup> See, for example, Exhibit I.STAFF-4.

<sup>2</sup> Exhibit B, Tab 1, Schedule 1, Attachment 1, PCLI letter of support.

OEB Staff asked whether EGI had discussed DSM with the 3 customers for whom the project is being built.<sup>3</sup> As IGUA has also consistently advocated, large, energy intensive and trade exposed industrials are fully motivated and engaged in considering their own environmental performance and compliance obligations against the economics and competitive pressures specific to their industries and processes, and in minimizing energy costs wherever possible. Process specific energy efficiency, where it makes economic sense, is naturally considered by large volume industrial customers. The proposed project will be fully paid for by the customers who have requested it, on the basis of their own economic assessments of such costs and alternatives thereto for meeting their emissions compliance obligations and aspirations.

In respect of future proofing the project to accommodate the future use of hydrogen, EGI has essentially indicated that such considerations in this application are premature, given the ongoing Hydrogen Blending Study directed by the OEB in the Phase 1 rebasing decision.<sup>4</sup> As EGI has also indicated<sup>5</sup>, which is consistent with IGUA's understanding and that of its members, both the availability and affordability of hydrogen remain practical impediments to hydrogen fuel or process input adoption, even where hydrogen is technically substitutable in support of an industrial process.

Considering the foregoing, IGUA supports the granting of leave to construct the Mississauga Reinforcement Project.

Yours truly,



Ian A. Mondrow

c: J. Irving (IGUA)  
N. Sebaa (IGUA)  
R. Tomek (EGI)  
T. Persad (EGI)  
J. Fernandes (OEB Staff)  
J. Sidlofsky (OEB Counsel)

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<sup>3</sup> Exhibit I.STAFF-3, part c).

<sup>4</sup> Exhibit I.ED-3.

<sup>5</sup> Exhibit I.ED-3, part g).