

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

October 8, 2025

EB-2025-0065 Enbridge 2025 Gas Supply Plan
Pollution Probe Letter on Remaining Procedural Steps

Dear Mr. Murray:

Pollution Probe is in receipt of Enbridge's package of undertaking responses dated October 2, 2025 which included a cover letter stating Enbridge's preference for the next procedural steps in this proceeding. In the cover letter Enbridge indicates:

"There is now a full record upon which a decision can be made for all items on the Issues List. Enbridge Gas submits that there is no need for a further oral hearing process. Enbridge Gas further submits that the appropriate next step for this adjudicated process is to move to written submissions." and "The Company is not aware of what specific points of disagreement or concern may be raised by other parties in relation to any of the listed issues."

Pollution Probe is not clear on what the OEB intends for future steps in this proceeding and provides the following comments for OEB consideration. Procedural steps will be influenced by the elements that the OEB would like to decide in this proceeding vs. carrying forward to a future proceeding (For example, if there are Framework amendment required, are they to be identified and addressed from the Decision from this proceeding or will that be a future proceeding. This will influence the level of detail in this proceeding).

In alignment with stakeholder and OEB Staff recommendations, the OEB proceeded with an adjudicated approach for the review of the 2025 Five-year Gas Supply Plan and related Framework. The 2025 Gas Supply Plan related to annual costs over \$5 billion, and over \$2 billion in commodity costs alone¹. Due to the significance and importance of the Gas Supply Plan, the OEB developed hearing schedule options aligned with a 'Greater than \$500 million revenue requirement performance standard' (i.e., a decision within 355 days of determining the application is complete). The proposed schedule option shared with stakeholders noted a full hearing process including an oral hearing component².

¹ Exhibit I.6-PP-26, Attachment 1, Page 24.

² <https://www.rds.oeb.ca/CMWebDrawer/Record/897875/File/document>

The OEB approved Issues List includes a broad range of issues including the appropriateness of the Gas Supply Plan filed by Enbridge, the need for the OEB to review and/or amend the Framework and/or annual review process, and the appropriateness to consider and include supply-side IRP options where those could be impacted by gas transportation arrangements and/or gas contracting. Related issues have been discussed during the discovery phase of the proceeding, such as impacts of Enbridge's modeling of customer disconnections from the system³ and Enbridge noted that updates to this modelling and its impact on natural gas demand will be part of the future Gas Supply Plans⁴. Enbridge also filed a new process flow to represent how Gas Supply links to its current IRP processes⁵. It is unclear how detailed a process the OEB intends for issues like this via this proceeding.

Pollution Probe is unclear how all issues outlined on the Issues List would be resolved based on the approach proposed by Enbridge. The level of issue resolution that the OEB would like to achieve will influence the process for the rest of this proceeding. Regardless of the process the OEB applies for the next steps in this proceeding, Pollution Probe suggests that there is required transparency and value in having Enbridge filing Argument in Chief in advance of submission by other stakeholders. Skipping that normal procedural step would place stakeholders in the position of guessing at what Enbridge's position is on each of the issues. It would be more focused and efficient to have Enbridge Argument in Chief filed in advance of submission by other stakeholders.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Cc: Enbridge Regulatory, (via EGRegulatoryproceedings@enbridge.com)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

³ Exhibit I.2-PP-2, Attachment 1, Page 9.

⁴ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 149, line 1 to page152, line 16.

⁵ Exhibit I.6-PP-15, Attachment 1 and OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 148, lines 6 to 11.