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Enbridge Gas Inc.
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VIA EMAIL and RESS

October 23, 2025

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

Dear Ritchie Murray:

Re: EB-2025-0065 - Enbridge Gas Inc. (Enbridge Gas) 5 Year Gas Supply Plan - Response to FRPO's Procedural Submission

On October 21, 2025, the Federation of Rental-housing Providers of Ontario (FRPO) filed a submission with the OEB in response to the cover letter to the Technical Conference undertakings filed by Enbridge Gas on October 2, 2025.

Enbridge Gas does not intend to reiterate the points raised in our cover letter on the suggested next steps in the procedural process, but having reviewed the letter submitted by FRPO, the Company remains confident that the record is complete, and regulatory efficiency favours proceeding to a written hearing rather than an oral hearing.

Other than FRPO, no other party has responded to our October 2nd letter arguing against the written hearing suggested by Enbridge Gas. In the Company's view, the issues raised by FRPO can be made in argument, to the extent that they are relevant, and Enbridge Gas will respond as appropriate.

With all of that being said, Enbridge Gas would like to specifically respond to some of the inaccuracies noted in the submission made by FRPO. Enbridge Gas is doing so to correct the misleading impressions included in the FRPO letter, and to confirm to the OEB why no oral hearing is required to address these items.

The reference in FRPO's submission to evidence in Phase 1 of the 2024 Rebasing Application, combines two sentences from two separate paragraphs of evidence to portray Enbridge Gas as having claimed there would be no impact to incremental gas supply contracting as a result of the harmonized design day methodology. The first sentence cited is from paragraph 65 and outlines the design day impact amounts, including a forecast 113 TJ/day increase for the Enbridge CDA as a result of the proposed harmonized methodology.¹ The second sentence cited is from paragraph 67 under the heading *Asset Management Plan Impacts* and states that there would be no impact to Enbridge Gas transmission or storage facilities outlined in Enbridge Gas's

¹ EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p.33.

AMP.² This statement was not intended to apply to gas supply plan impacts which are referenced in paragraph 68 under the heading *Gas Supply Plan Impacts* with a reference to another part of evidence that provided how Enbridge Gas plans to manage the changes within the Gas Supply Plan.³

FRPO claims that the increase in the Enbridge CDA design day demand is a surprise and that “assurances of no incremental transmission or storage facilities are hollow”⁴. Prior to filing Enbridge Gas’s 2024 Rebasing Application with the OEB, Enbridge Gas used the Gas Supply Plan 2022 Annual Update process to communicate potential gas supply related impacts from the forthcoming rebasing application including a range of estimated design day demand impacts as a result of harmonization efforts:

Assuming no other changes to processes upstream of the Gas Supply Plan, if EGI were to align weather and design day demand methodologies to a set temperature approach, EGI estimates that additional design day gas supply services would be required in the range of 100-150TJ/d, or approximately 2.5-3.7%, for the EGD delivery areas. To meet the potential increase in demand in the EGD rate zone, EGI would be required to contract for incremental gas supply services. This would include assessment of all gas supply options available at that time, including firm transportation and/or utilization of a third party peaking service. Upon approval of EGI’s rebasing application, EGI would contract for this shortfall in advance of winter 2024/25.

FRPO submits that the design day demand table does not include comparable figures for the previous year. Enbridge Gas excluded previous year design day figures on the basis that the previous year figures were prepared under the old methodology and did not serve as a good comparator to design day figures using the new methodology. Previous year design day amounts (prepared using the old methodology) can be found in the 2024 Annual Update and Enbridge Gas intends to include previous year design day amounts in the 2026 Annual Update, which is the first opportunity to reflect current and prior gas supply plan figures under the same forecast methodologies.

The design day demand methodology is not a topic on the Issues List of the current proceeding. The design day methodology was resolved in Phase 1 of the 2024 Rebasing Application as Issue 18 c) in the 2024 Rebasing Phase 1 Settlement Agreement between parties and Enbridge Gas⁵:

For the purposes of determining gas supply costs for 2024 and subsequent years during the upcoming IRM term, Parties agree to a modified version of the Enbridge Gas proposal for design day and design hour. The modification is that wind-adjusted temperature values used to determine design criteria and the design day demands for the Gas Supply Plan will be set on the basis of the coldest day in 30 years (using the gas years 1993/1994 to 2022/2023), to be fixed until Enbridge Gas’s next rebasing case.

² EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p.33.

³ EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p.34.

⁴ FRPO Procedural Submission, October 21, 2025, p.4

⁵ EB-2022-0200, Settlement Agreement, Exhibit O1, Tab 1, Schedule 1, August 17, 2023, p.36.

Accordingly, Enbridge Gas submits that it would not be appropriate for the topic of design day methodology to be revisited as part of this proceeding.

Should you have any questions on this matter please contact the undersigned.

Yours truly,

A handwritten signature in cursive script that reads "Richard Wathy".

Richard Wathy
Technical Manager, Regulatory Applications

cc: David Stevens, Aird & Berlis LLP
EB-2025-0065 Intervenors