



Richard Wathy
Technical Manager
Regulatory Applications
Regulatory Affairs

Cell: 519-365-5376
Email: Richard.wathy@enbridge.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive N.
Chatham, Ontario, N7M 5M1
Canada

VIA RESS and EMAIL

November 25, 2025

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

Dear Ritchie Murray:

**Re: EB-2025-0065 – Enbridge Gas Inc. (Enbridge Gas)
5-Year Gas Supply Plan – Argument in Chief**

In accordance with the Ontario Energy Board's (OEB) Procedural Order No. 2, dated November 5, 2025, enclosed please find the Argument in Chief of Enbridge Gas.

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

Sincerely,

Richard Wathy

Richard Wathy
Technical Manager, Regulatory Applications

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

ONTARIO ENERGY BOARD

**REVIEW OF ENBRIDGE GAS 5-YEAR GAS
SUPPLY PLAN**

ENBRIDGE GAS INC.

ARGUMENT IN CHIEF

AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
Suite 1800, Box 754
181 Bay Street
Toronto, ON M5J 2T9

David Stevens
Tel (416) 863-1500

Email: dstevens@airdberlis.com

Counsel to Enbridge Gas

A. OVERVIEW

1. As required under the OEB's Framework for the Assessment of Gas Distributor Gas Supply Plans (the Framework)¹, Enbridge Gas Inc. (Enbridge Gas, or the Company) filed a 5-Year Gas Supply Plan for the years 2026-2030 (5-Year GSP). Enbridge Gas's filing also includes the 2025 Annual Update for its gas supply plan.
2. The 5-Year GSP sets out how Enbridge Gas will meet gas supply requirements over the next five years in a way that is prudent and delivers value to customers. In particular, the 5-Year GSP sets out how Enbridge Gas balances the OEB Framework gas supply planning principles of cost-effectiveness, reliability and security of supply in a measured and considered fashion (taking into account the need for flexibility and diversity of supply), such that future changes in demand or supply can be managed appropriately.
3. Parties had full opportunity to seek further information about the 5-Year GSP and 2025 Annual Update and did so through interrogatories and a Technical Conference. No major issues were raised through the discovery process, and no party has suggested that Enbridge Gas failed to meet expectations in terms of its filing.
4. The OEB has set an expectation that this will be an "adjudicated proceeding". An Issues List was approved, setting out the items that the OEB will consider in its review of the 5-Year GSP and 2025 Annual Update.
5. The Issues List asks whether Enbridge Gas has met each of the OEB's expectations from the Framework for a 5-year gas supply plan and annual update. Enbridge Gas submits that the answer is "yes", in each instance.
6. The Issues List also asks whether changes are required for the Framework, or for the timing of future Annual Reviews. Enbridge Gas submits that the current processes are working well, and no changes are required.

¹ EB-2017-0129 Report of the Ontario Energy Board, Framework for the Assessment of Distributor Gas Supply Plans (Framework).

7. In the submissions that follow, Enbridge Gas sets out its response to each of the issues, starting with a high-level summary of relevant contextual information. Enbridge Gas will respond to specific issues or comments from other parties in Reply Argument.

B. ORDER REQUESTED

8. In Procedural Order No. 2, the OEB directed Enbridge Gas to include proposed draft order language as part of its Argument in Chief (also stated as “specific wording for the order Enbridge Gas seeks”).

9. Enbridge Gas is not requesting a specific Order from the OEB in this proceeding.

10. This is not a typical application. There is no “Notice of Application”, and no “Relief Sought” in the traditional sense as would be seen in a rates or leave to construct application.

11. Instead, this 5-Year GSP (and 2025 Annual Update) is prepared and filed in response to the OEB’s Framework. As set out in the Framework, the OEB will “assess” each 5-year gas supply plan, to ensure that they are consistent with the OEB’s Guiding Principles for the Assessment of Gas Supply Plans (Guiding Principles) set out in the Framework and confirm that the distributor has met the OEB’s “Framework Criteria”.²

12. The matters to be considered in this case are set out in the OEB-approved Issues List:

- a) Issues #1 to 5 ask whether the 5-Year GSP is consistent with the Guiding Principles and whether Enbridge Gas has met each of the OEB’s Framework Criteria.
- b) Issue #6 asks whether the 2025 Annual Update meets expectations.
- c) Issue #7 asks whether amendments to the Framework are required.
- d) Issue #8 asks whether a gas supply plan should consider supply-side integrated resource planning (IRP) options.

13. While Enbridge Gas is not requesting any specific Order or relief in this case, the Company is asking the OEB to make the following determinations on the Issues List:

- a) A positive determination on each of Issues #1-6, finding that the 5-Year GSP and 2025 Annual Update meet the OEB’s Guiding Principles and are reasonable and complete.

² Framework, pp. 8-13.

- b) A finding that no amendments or updates to the Framework are necessary (Issue #7).
- c) A finding that no additional detail or requirement related to supply-side IRP options is required to be added to a gas supply plan or annual update (Issue #8).

C. ENBRIDGE GAS'S EVIDENCE

14. On May 1, 2025, Enbridge Gas filed its 5-Year GSP, covering the November 1, 2025, to October 31, 2030, period. For continuity purposes (because the last Gas Supply Annual Update was for the 2024 gas year), Enbridge Gas also filed annual update information for November 1, 2024, to October 31, 2025.
15. Both the 5-Year GSP and the 2025 Annual Update are based on the multi-year gas supply plan (Plan) the Company prepares annually for the EGD rate zone and Union rate zones through its gas supply planning process.³
16. Enbridge Gas's 5-Year GSP adheres to the OEB's Guiding Principles for gas supply plans of cost-effectiveness, reliability and security of supply, and public policy. The 5-Year GSP achieves the OEB's Guiding Principles by maintaining a gas supply portfolio that includes a diversity of gas supply purchase points, gas supply producers and marketers, contract terms, and transportation service providers.
17. The 5-Year GSP was prepared based on the approach outlined in the Framework, consistent with the approach used for the 2019-2024 GSP that was endorsed by the OEB⁴, updated for various directives received since the Framework was established.⁵
18. The development of the Company's Plan begins with the determination of annual and design day demand forecasts (as described in Section 4 of the evidence⁶) that reflect factors such as historical demand and customer trends, changing weather patterns, and energy transition. Following the completion of the demand forecasts, Enbridge Gas identifies any Plan shortfalls based on its current portfolio of transportation and storage assets by delivery area. Enbridge Gas next evaluates and adjusts its transportation, storage, and commodity portfolio to ensure sufficient natural gas is available in each delivery area to meet the annual

³ A summary of the process followed by Enbridge Gas is found at prefiled evidence, p. 4.

⁴ EB-2019-0137 Consultation to Review Natural Gas Supply Plans – OEB letter dated March 26, 2020.

⁵ See prefiled evidence, Appendix F.

⁶ Section 4 of the prefiled evidence is found at pp. 15-28.

and design day demand forecasts. A description of the current portfolio of assets and available options is provided in Section 5 of the evidence.⁷

19. Enbridge Gas ensures the Plan complies with the OEB's Guiding Principles (as described in Section 6 of the evidence⁸) and continuously monitors risks that may impact the Plan (as described in Section 7 of the evidence⁹) throughout its execution (as described in Section 8 of the evidence¹⁰). The Plan's inter-dependence with other regulatory applications (as described in Section 9 of the evidence¹¹) is continuously monitored, a three-year historical review of the Plan's actual performance is conducted (as described in Section 10 of the evidence¹²), and the Plan's historic effectiveness is evaluated using a set of performance metrics (as described in Section 11 of the evidence¹³).
20. Enbridge Gas's prefiled evidence totals 244 pages, and includes all items specified in the Filing Requirements for a Gas Supply Plan, as outlined in the Framework. It also includes the additional items required by relevant OEB directions from prior Annual Update reviews, as summarized at Appendix F.
21. Enbridge Gas's prefiled evidence was tested through a full discovery process.
22. On September 4, 2025, the Company filed responses to 144 interrogatories (not including sub-parts) from 12 parties, totalling 478 pages.
23. On September 16 and 17, 2025, Enbridge Gas presented a panel of seven witnesses for a two-day Technical Conference. Ten parties took the opportunity to ask follow-up questions at the Technical Conference. Following the Technical Conference, the Company provided written responses to 20 undertakings.

⁷ Section 5 of the prefiled evidence is found at pp. 28-62.

⁸ Section 6 of the prefiled evidence is found at pp. 63-72.

⁹ Section 7 of the prefiled evidence is found at pp. 72-78.

¹⁰ Section 8 of the prefiled evidence is found at pp. 78-79.

¹¹ Section 9 of the prefiled evidence is found at pp. 79-80.

¹² Section 10 of the prefiled evidence is found at pp. 81-84.

¹³ Section 11 of the prefiled evidence is found at pp. 85-86.

24. In Procedural Order No. 2, the OEB agreed with Enbridge Gas that “the evidentiary record is complete and that there is a sufficient basis upon which a decision can be made on all items set out in the issues list”.¹⁴

D. ENBRIDGE GAS’S 5-YEAR GAS SUPPLY PLAN MEETS THE EXPECTATIONS IN THE GSP FRAMEWORK AND THE ISSUES LIST

25. The Issues List asks a series of questions about whether and how the 5-Year GSP meets the OEB’s expectations as set out in the Framework and subsequent OEB decisions.

26. As set out below, Enbridge Gas has met all expectations and requirements. This is seen by reviewing each of the related issues from the Issues List.

Issue #1- Does the 5-year gas supply plan appropriately reflect and balance the three OEB gas supply guiding principles in a way that is prudent and delivers value to customers?

27. Yes, the 5-Year GSP appropriately reflects and balances the OEB’s Guiding Principles in a way that is prudent and delivers value to customers.

28. The objective of Enbridge Gas’s gas supply planning process is to identify an efficient manner to serve Enbridge Gas’s customers, using a combination of supply purchases, transportation, and storage assets. The goal of Enbridge Gas’s gas supply planning process is to meet customers’ gas supply requirements while adhering to the Company’s gas supply planning principles and practices, which are as follows:

- a) **Cost-effectiveness** – If the supply/service option is intended to satisfy average day needs, Enbridge Gas will evaluate it based on landed costs (i.e. \$/GJ/d). If the option is intended to meet design day needs, annual costs (i.e. \$/GJ/yr) are calculated.
- b) **Reliability and security of supply** – Characteristics of supply/service option reliability and security evaluated by Enbridge Gas include, but are not limited to: liquidity, nomination performance, delivery performance, transportation distance, service quality, system connectivity, and the magnitude of existing third-party services (e.g., peaking and delivered services) in the Company’s portfolio. Related, characteristics of supply/service option flexibility evaluated by Enbridge Gas include, but are not limited to: contracting lead time, contract term, availability of third-party services, number of nomination windows accessible, and renewal rights. Related characteristics of supply/service option diversity evaluated by Enbridge Gas include but are not limited to access to transportation paths, and access to gas supplies.

¹⁴ Decision on Confidentiality and Procedural Order No. 2, November 5, 2025, p. 2.

Enbridge Gas's gas supply planning principles align with the OEB's Guiding Principles of cost-effectiveness, reliability and security of supply, and public policy, as set out in the Framework.¹⁵

29. In the Framework, the OEB explained its expectations in relation to the Guiding Principles:

*For clarity, cost-effectiveness does not necessarily mean the “lowest cost,” reliability does not mean “reliable at any cost” and support for public policy does not mean “support at any cost” or “any level of reliability.” Rather, the intent is to strike a balanced approach to the benefit of customers. Distributors are required to demonstrate that their gas supply plans balance the principles in a way that is prudent and appropriate for customers. It is expected that distributors will employ strategies that clearly describe their approach, customer impacts and risks associated with both the options considered and chosen to deliver value to customers.*¹⁶

30. Enbridge Gas executes its Plan in an economically efficient manner and considers cost-effectiveness in its decision-making. The gas supply plan evaluates cost-effectiveness on the basis of total annual portfolio costs, which is comprised of commodity, transportation and storage costs. When evaluating incremental contracting alternatives, Enbridge Gas evaluates the cost-effectiveness of contracting alternatives by comparing changes in total portfolio costs.¹⁷

31. The Company routinely evaluates supply/service options relative to the OEB's Guiding Principles and maintains a gas supply portfolio that includes a diversity of gas supply purchase points, gas supply producers and marketers, contract terms, and transportation service providers.¹⁸

32. Similarly, Enbridge Gas owns and contracts for storage capacity to further improve the diversity of its gas supply portfolio. This approach allows Enbridge Gas to effectively manage costs while maintaining the flexibility needed to adapt to dynamic market conditions and weather fluctuations. This balanced approach ensures Enbridge Gas's customers have access to secure and reliable natural gas at a prudently incurred cost.¹⁹

¹⁵ Prefiled evidence, pp. 5-6.

¹⁶ Framework, p. 8.

¹⁷ Exhibit I.1-FRPO-7.

¹⁸ Prefiled evidence, p. 6.

¹⁹ Prefiled evidence, p. 7.

33. In total, Enbridge Gas's gas supply plan is flexible to adapt to dynamic market and operational conditions during the year through the operation of its flexible commodity, transportation and storage portfolios.²⁰
34. Throughout the 5-Year GSP, Enbridge Gas provides evidence that sets out how its Plan aligns with the OEB's Guiding Principles. Enbridge Gas's balanced approach is aligned with the OEB's expectations, as set out in the Framework.

Issue #2 - Does the 5-year gas supply plan appropriately address the gas supply plan criteria set out in the OEB's Framework for the Assessment of Gas Distributor Gas Supply Plans (Framework):

- a) Demand forecast analysis***
- b) Supply option analysis***
- c) Risk mitigation analysis***
- d) Achieving public policy objectives***
- e) Procurement process and policy analysis***
- f) Performance measurement***

35. Yes, the 5-Year GSP appropriately addresses each of the six gas supply plan criteria set out in the Framework.
36. Enbridge Gas's 5-Year GSP filing explains how the Company meets each of the OEB's six gas supply plan criteria.
- a) ***Demand forecast analysis*** - Section 4 of the 5-Year GSP is titled "Gas Supply Plan Outlook – Demand Forecast".²¹ It sets out the Company's annual and design day forecasts for the 2025 Annual Update and the 2025-2030 5-Year GSP. As required by the Framework²², Enbridge Gas used the OEB-approved methodologies in place at the time when the 5-Year GSP was prepared.²³ The same demand forecast methodologies are used for the 5-Year GSP and the Asset Management Plan (AMP).²⁴
 - b) ***Supply option analysis*** - Section 5 of the 5-Year GSP is titled "Portfolio Overview".²⁵ This is the largest section, and main focus, of the 5-Year GSP. It sets out the Company's current gas supply portfolio to meet annual and design day demand, as well as the strategy for addressing future shortfalls and contract renewals. Specific detail is

²⁰ Exhibit I.6-PP-22(a).

²¹ Prefiled evidence, pp. 15-28.

²² Framework, p. 8.

²³ See also Exhibit I.2-STAFF-3 and 4; Exhibit I.2-FRPO-8 and 11; Exhibit I.2-CME-1; and Exhibit I.2-VECC-4.

²⁴ Exhibit JT1.11.

²⁵ Prefiled evidence, pp. 28-62.

provided about the contracting decisions that have been made for the immediate term. As required by the Framework²⁶ and subsequent direction/recommendations from the OEB²⁷ and OEB staff²⁸, Enbridge Gas has included landed cost analysis²⁹, forecasted premium/discount by contract year³⁰, holistic analysis³¹ and recommendation memoranda³² to support the contracting decisions detailed in the evidence. Enbridge Gas responded to many follow-up questions about this section of evidence, in interrogatories³³, at the Technical Conference³⁴, and in undertaking responses from the Technical Conference³⁵.

- c) *Risk mitigation analysis* – Section 7 of the 5-Year GSP is titled “Forecast Risk”.³⁶ Enbridge Gas explains how it manages and limits risk from interruptions of supply, transportation and storage. Enbridge Gas also explains the way that it manages risks associated with weather variability and the associated impacts on demand and pricing and provides scenario analysis of the potential impacts on gas supply portfolio costs from significant changes in demand.³⁷
- d) *Achieving public policy objectives* – Section 6 of the 5-Year GSP is titled “Achieving Public Policy”.³⁸ As set out in the Framework, a distributor is to identify and demonstrate the public policy that their gas supply plan is supporting and how they’ve balanced achieving this with the other guiding principles in this Framework. The OEB clarified that the focus should be public policy initiatives that are in effect rather than proposed public policy initiatives.³⁹ Enbridge Gas’s evidence focuses on current policy developments, such as trade policy (tariffs) and climate policy, and on lower-carbon energy in the gas supply portfolio. The evidence establishes that Enbridge Gas is taking appropriate measures to take applicable current public policy developments into account in its 5-Year GSP.
- e) *Procurement process and policy analysis* – Section 8 of the 5-Year GSP is titled “Gas Supply Plan Execution”.⁴⁰ As explained, Enbridge Gas’s supply procurement strategy

²⁶ Framework, p. 9.

²⁷ EB-2023-0326 Decision and Order, March 5, 2024 - 2021 Vector Contracting Decision, p. 11.

²⁸ EB-2024-0067 – OEB Staff Report, Review of 2024 Annual Update to Enbridge Gas Inc. Natural Gas Supply Plan, pp. 46-47.

²⁹ Prefiled evidence, Appendix K, NGTL Landed Cost; and Appendix M, Vector Landed Cost.

³⁰ Prefiled evidence, Appendix L, Forecasted Premium/Discount Resulting From Transportation Purchases.

³¹ Prefiled evidence, Appendix C, 2024/25 Enbridge CDA Shortfall – Holistic Analysis.

³² Prefiled evidence, Appendix J, Transportation Recommendation Documentation.

³³ See, for example, Exhibit I.2-FRPO-13 (forecast shortfalls by delivery area); Exhibit I.1-FRPO-1, 4 and 38 (landed cost analysis); Exhibit I.2-CCC-4, Exhibit I.2-SEC-5, Exhibit I.5-EP-2 and Exhibit I.1-FRPO-6 (peaking services); and Exhibit I.2-CCC-11 and Exhibit I.1-FRPO-27 (market priced storage).

³⁴ See, for example, 1 TC Tr. 6-10 and 165-167 (supply option analysis); and 1 TC Tr. 133-134 (peaking services).

³⁵ See, for example, Exhibits JT1.1 to JT1.5 and Exhibits JT2.1 to 2.3.

³⁶ Prefiled evidence, pp. 72-78.

³⁷ See also Exhibit I.3-ED-3 re. impacts of changes in demand.

³⁸ Prefiled evidence, pp. 63-72.

³⁹ Framework, p. 11.

⁴⁰ Prefiled evidence, p. 78-79. Enbridge Gas filed its Gas Supply Procurement Policies and Procedures at Exhibit I.1-SEC-1, Attachment 1.

uses a layered approach to procure supply regularly throughout the year for various terms from credit-worthy counterparties at multiple purchase points and based on relevant market indexes. While executing the supply procurement strategy Enbridge Gas monitors factors including weather, customer demand, commodity prices, and market conditions to identify when significant variation to forecast or volatility arises.⁴¹

- f) *Performance measurement* – Section 11 of the 5-Year GSP is titled “Performance Measurement”.⁴² As explained, Enbridge Gas has created performance metrics to monitor the effectiveness of the gas supply plan. Metrics have been added or refined over the first 5-year gas supply plan term, to reflect comments from stakeholders and recommendations from OEB staff. Enbridge Gas will continue to review and modify its approach to performance metrics and will provide updates on these efforts in future gas supply plan filings, as required.⁴³

37. Enbridge Gas acknowledges that parties have asked a substantial number of interrogatories about some of the gas supply plan criteria from the Framework and continued with questions at the Technical Conference. It is not clear, though, what (if any) items relevant to the gas supply plan criteria parties may choose to address in their submissions nor what (if any) different outcomes parties may recommend. Enbridge Gas will address any such items in Reply Argument.

Issue #3 - Does the 5-year gas supply plan provide appropriate gas supply plan outlook information?

38. Yes, Enbridge Gas has provided appropriate gas supply outlook information as part of the 5-Year GSP filing.

39. In addition to the evidence filed to address each of the Framework gas supply plan criteria, Enbridge Gas also included a “Market Outlook” summary of publicly available relevant information about the gas market at Appendix A. This includes information about supply and price forecasts over the next five years, as well as information about expected challenges with the North American transportation market. Further information about transportation path scarcity, which influences Enbridge Gas’s contracting decisions, is set out in prefiled evidence⁴⁴ and in response to interrogatories.⁴⁵ This information all

⁴¹ See also Exhibit I.2-STAFF-15.

⁴² Prefiled evidence, pp. 85-86. The Performance Metrics results are found at Appendix E to the prefiled evidence.

⁴³ Prefiled evidence, p. 85.

⁴⁴ See prefiled evidence, pp. 30-31.

⁴⁵ See, for example, Exhibit I.2-STAFF-5; Exhibit I.2-STAFF-6; and Exhibit I.2-FRPO-15.

influences the Company's Plan and options analysis, as explained throughout the 5-Year GSP.

40. There are only three interrogatories associated to Issue #3. There is no suggestion that Enbridge Gas's gas supply plan outlook evidence is insufficient or otherwise lacking.

Issue #4 - Is Enbridge Gas's planned approach to execution of the 5-year gas supply plan appropriate, including implementing changes resulting from Phases 2 and 3 of the 2024 Rebasing Proceeding in future Annual Updates?

41. Yes, the Company's planned approach to execution of the 5-Year GSP, including implementing changes resulting from Phases 2 and 3 of the Rebasing Proceeding, is appropriate.

42. As explained, Enbridge Gas annually prepares its Plan through its gas supply planning process. The implementation of the Plan also occurs on an annual basis. Section 2.3 of the prefiled evidence describes the process through which Enbridge Gas establishes and implements its Plan. The overall approach is summarized in Figure 1 below.⁴⁶

Figure 1
Annual Gas Supply Planning Process



⁴⁶ Prefiled evidence, p. 11.

43. As explained in evidence, the submitted 5-Year GSP does not yet reflect changes that result or that will result from Phases 2 and 3 of the Rebasing Proceeding.
44. Enbridge Gas intends to address gas supply impacts from Phase 2 of the Rebasing Proceeding within the 2026 Annual Update which will be filed with the OEB following the completion of this adjudicative process. Phase 2 impacts will see Enbridge Gas reduce the amount of contracted market-based storage by 8 PJ, to 18 PJ from the current level of 26 PJ. The reduction in market-based storage in the Plan will result in an increase in planned winter purchases and a reduction in planned summer purchases. Enbridge Gas will also implement the maximum firm storage withdrawal and injection capabilities of 4.0 PJ/d and 1.7 PJ/d, respectively, within the Plan which will serve as a cap on utility withdrawals from and injections into storage. The implementation of a maximum withdrawal capability will result in increased planned Dawn purchases on design day.⁴⁷
45. Enbridge Gas intends to update the Plan for impacts related to the outcome of Phase 3 through the first appropriate gas supply planning process following an OEB decision on Phase 3 of the Rebasing application.⁴⁸ The nature and timing of the updates will depend upon the outcomes from Phase 3.

Issue #5 - Has Enbridge Gas responded appropriately to previous commitments, OEB staff reports and OEB decisions as they relate to the 5-year gas supply plan?

46. Yes, Enbridge Gas has responded appropriately to previous commitments, OEB staff reports and OEB decisions that are relevant to the 5-Year GSP.
47. Appendix F to the prefiled evidence sets out each of the OEB directives and previous commitments that are relevant to the 5-Year GSP, with a reference to the part of the evidence where the response is included. Appendix F points to a total of 14 such directions and responses.

⁴⁷ Prefiled evidence, p. 7.

⁴⁸ Prefiled evidence, p. 8.

48. No party asked any interrogatory about Appendix F, or about Enbridge Gas's compliance with previous commitments and directions relevant to the gas supply plan.⁴⁹

E. ENBRIDGE GAS'S 2025 ANNUAL UPDATE MEETS THE EXPECTATIONS IN THE GSP FRAMEWORK AND THE ISSUES LIST

49. As noted, the Company's filing includes not only the 2025-2030 5-Year GSP, but also the 2025 Annual Update (for the November 1, 2024, to October 31, 2025, period). This information is included for continuity, because the last Annual Update for Enbridge Gas covered the 2024 gas year.⁵⁰

50. There is one issue on the Issues List related to the 2025 Annual Update.

Issue #6 – Has Enbridge Gas filed appropriate evidence and explanation to support its 2025 Annual Update to the previous 5-year gas supply plan?

51. Yes, Enbridge Gas has filed appropriate evidence and explanation to support the 2025 Annual Update.

52. As part of Section 5 of the prefiled evidence, Enbridge Gas sets out its transportation portfolio changes made since the Company filed its 2024 Annual Update.

53. The two changes that received the most attention from intervenors are the renewal of Vector pipeline capacity and the third-party assignment of FT TCPL capacity from Niagara to the Enbridge CDA beginning November 1, 2024.

54. The Company explained the rationale for the Vector capacity renewal as follows:

As the Vector capacity is required to meet the Company's design day demands on its SIL system, supports Enbridge Gas's objective of structuring a portfolio with a diversity of contract terms (includes renewal rights) and supply purchase points, and is consistent with the gas supply principle of ensuring secure and reliable gas supply at a reasonable and competitive cost, Enbridge Gas renewed contracts for existing capacity for a term of three years (beginning November 1, 2025).⁵¹

⁴⁹ While there are five interrogatories associated to Issue #5, none of these directly ask about responses to OEB directions or previous commitments.

⁵⁰ EB-2024-0067.

⁵¹ Prefiled evidence, p. 42.

55. Detailed evidence in support of the Vector capacity renewal is found at Appendix D (ICF Report re: Chicago Natural Gas Price Analysis), Appendix J, page 31 (2025 Vector Pipeline Renewal recommendation memo), Appendix M (Vector Landed Cost analysis relative to alternatives), and Appendix L (Forecasted Premium/Discount Resulting from Transportation Purchases).⁵²

56. The third-party TCPL capacity assignment is aimed at managing a design day shortfall for the Enbridge CDA. The arrangement is described as follows in evidence:

To address the remaining shortfall, the Company sought out additional third-party services to manage the design day shortfall and contracted for 121,142 GJ/d of new third-party TCPL assignment capacity. As part of this arrangement, FT capacity from Niagara to Enbridge CDA is temporarily assigned for four months of the winter season and Enbridge Gas must purchase natural gas commodity to fill that capacity from the same third-party at Niagara at a fixed premium (which includes associated transportation costs) to the Dawn daily index price as published by S&P Global Platts. This contract has renewal rights and allows for annual volume increases over a five-year term up to a maximum of 255,618 GJ/d. No directly comparable supply/service options exist as this service was negotiated directly with a third-party.

*The new third-party TCPL assignment capacity is a cost-effective alternative that supports Enbridge Gas's objective of structuring a portfolio with a diversity of contract terms and supply purchase points and is consistent with the gas supply principle of ensuring secure and reliable gas supply at a reasonable and competitive cost.*⁵³

57. As can be seen, the assignment of TCPL capacity is a creative, cost-effective way to meet design day requirements without the immediate need to enter into a new long-term contract or build new facilities.

58. Enbridge Gas answered follow-up questions about the 2025 Annual Update components through interrogatories and at the Technical Conference.⁵⁴ Enbridge Gas is not aware that there are significant outstanding concerns but will address any items raised in Reply Argument.

⁵² See also Exhibit I.2-CCC-5 to 9; and Exhibit JT1.12.

⁵³ Prefiled evidence, pp. 39-40.

⁵⁴ See, for example, Exhibit I.2-CCC-5 to 9; Exhibit I.2-FRPO-35; and Exhibit I.2-FRPO-37 (all re. Vector renewal); and Exhibit I.2-FRPO-16 to 19 (re. TCPL capacity assignment). See also 1 TC Tr. 89-93 (Vector renewal) and 2 TC Tr. 13-22 and 53-56 (TCPL capacity assignment).

F. NO NEED FOR SUBSTANTIAL CHANGES TO GSP FRAMEWORK OR REVIEW PROCESS

59. Issue 7 asks “***Should the OEB review and/or amend the Framework and/or annual review process (including timing)?***”

60. Enbridge Gas has no concerns with the Framework in its current form. While Enbridge Gas understands that the OEB wants to have an adjudicative process for this current 5-Year GSP, that should remain the exception. For future 5-year plans, the OEB should assess whether the expanded adjudicative process being employed in this case (which goes beyond the expectations in the Framework⁵⁵) is efficient and required.

61. For annual updates, an adjudication should only be needed where OEB staff identifies a disputed issue or item that is significant enough to warrant OEB review.

62. As explained in response to interrogatories⁵⁶, the Company believes that the OEB should proceed cautiously when considering any proposed changes to the Framework to ensure that any such decisions are made with a full understanding of their practical implications to Enbridge Gas’s established business and planning processes. For example, proposals to adjust the timing of future annual updates or 5-Year gas supply plans must be considered in the context of Enbridge Gas’s annual demand forecasting and gas planning processes.

G. CONSIDERATION OF SUPPLY-SIDE IRP OPTIONS

63. Issue 8, which was added at the Stakeholder Conference, asks “***Should the gas supply plan consider and include supply-side IRP options where those could be impacted by gas transportation arrangements and/or gas contracting?***”

64. Enbridge Gas submits that its current approach is working well, and no changes are needed.⁵⁷

65. Enbridge Gas’s annual gas supply planning process provides an inherent benefit of avoided or reduced facilities in that it seeks to leverage available third-party alternative options to

⁵⁵ Framework, Section 4.1 to 4.3 (pp. 13-14).

⁵⁶ See Exhibit I.7-STAFF-1; and Exhibit I.7-VECC-1.

⁵⁷ A process diagram showing how the gas supply planning process and IRP interact was provided at Exhibit I.6-PP-15, Attachment 1. This was discussed at 1TC Tr. 145-148.

address capacity shortfalls identified, maximizing utilization of existing Company-owned facilities.⁵⁸ This is seen, for example, in the third-party assignment of TCPL capacity from Niagara to the Enbridge CDA. Other examples of gas supply arrangements that reduce or potentially reduce facility requirements relate to the Panhandle Transmission System (PEPL supply) and the Sarnia Industrial Line (Vector, Great Lakes, NEXUS supply).⁵⁹

66. As explained in response at Exhibit I.2-Staff-12, the gas supply planning and IRP processes are distinct, but inter-related:

If the gas supply planning process determines that there is forecast demand for which there are no viable gas supply alternatives (including commercial/third-party options), then the Company may take steps to commence development of a facility project, including consideration of a baseline facility project within the Company's Asset Management Plan (AMP), and related IRP assessment(s). As part of that subsequent process, the Company may evaluate additional supply-side alternatives, including but not limited to those previously considered for gas supply planning purposes, to reduce or avoid the need for such facilities but would do so distinctly as part of the IRP process (as IRP alternatives). Where novel operational constraints are forecasted to result in capacity shortfalls the Company now addresses them through the evaluation of both facility and non-facility (IRP) alternatives, not as part of the gas supply planning process. Development of baseline facility projects, asset management planning, and integrated resource planning are each distinct and significant processes managed by different departments in co-ordination across the organization that occur after the gas supply planning process.⁶⁰

67. There is, therefore, no need to include additional or separate IRP analysis within the gas supply plan. Relevant IRP consideration of supply-side alternatives happens before (gas supply planning)⁶¹ and after (IRP)⁶² a facility requirement is identified.

⁵⁸ Exhibit I.2-STAFF-12.

⁵⁹ Prefiled evidence, pp. 67-68.

⁶⁰ Exhibit I.2-STAFF-12.

⁶¹ Exhibit I.2-STAFF-12.

⁶² Exhibit I.6-PP-16(c) and (d).

H. RELIEF REQUESTED

68. As noted, Enbridge Gas is not requesting any specific Order from the OEB in this proceeding. Instead, Enbridge Gas requests that the OEB's Decision reflect the answers to each of the issues from the Issues List as set out in this AIC.

All of which is respectfully submitted this 25th day of November 2025.

A handwritten signature in blue ink, appearing to read "David Stevens", is written above a horizontal line.

David Stevens, Aird & Berlis LLP
Counsel to Enbridge Gas