

December 10, 2025

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

Dear Mr. Murray:

**Re: Enbridge Gas Inc.
Application for Approval of Franchise Agreement and New Certificate of
Convenience and Necessity - City of Guelph
Ontario Energy Board File No. EB-2025-0058**

Enbridge Gas Inc. (Enbridge Gas) writes in response to the request by the City of Guelph and eMERGE Guelph Sustainability (eMERGE Guelph) to again delay the hearing of this application.

On December 4, 2025, the OEB determined that it was more efficient to proceed with hearing the current application and to proceed with submissions from the parties and OEB Staff on the timelines established by the OEB and on the narrow scope of issues relevant to this proceeding. Enbridge Gas submits that the original timelines should remain in place.

Enbridge Gas urges the OEB to proceed with adjudicating this application without further delay because:

- 1) There has not been any new relevant evidence put on the record of this proceeding since the City of Guelph responded to information requests on July 30, 2025;
- 2) The issues raised by the City of Guelph and eMERGE Guelph are outside of the OEB's jurisdiction;
- 3) Further delay is contrary to regulatory efficiency and prejudicial to Enbridge Gas.

All parties have had required information for months

There is nothing preventing this current proceeding from continuing on the established timelines. The parties have provided voluminous evidence and submissions on the various issues raised but nothing relevant has been added to the evidence record since July 30, 2025.

The City of Guelph and eMERGE Guelph were given adequate time to compile and submit their final submissions based on the limited scope of this proceeding.

It would be unproductive and procedurally unreasonable to delay this proceeding further, when the OEB has attempted to keep focused on issues specific to the renewal of the existing franchise agreement and any issues unique to the City of Guelph.

Further delay is contrary to regulatory efficiency and prejudicial to Enbridge Gas

As noted previously, Enbridge Gas anticipates filing more than 20 applications for franchise agreement renewals between now and the end of 2026. Delaying this proceeding may invite similar requests in other proceedings, risking a bottleneck that would be difficult for Enbridge Gas and the OEB to manage. In addition, Enbridge Gas has continued to file other matters such as leave to construct applications related to the remaining Natural Gas Expansion Program Phase 2 projects that will compete for limited resources at Enbridge Gas and the OEB in the early part of 2026. The ability to prepare for and manage regulatory proceedings based on a predictable workplan over time is essential. In this regard, the practical effects and implications of delays in otherwise routine proceedings is prejudicial to Enbridge Gas and any customers impacted by these proceedings.

Enbridge Gas reminds the OEB that this application is simply for purposes of renewing a specific, existing franchise agreement in the form of the OEB's current Model Franchise Agreement and updating the applicable CPCN to continue to provide efficient and cost-effective service to almost 50,000 natural gas customers within the City of Guelph. Given the already very complete record in this proceeding and the OEB's ability to amend any decision and order issued in this proceeding at a future date if required, there is no reason to delay adjudication of this application any further. Enbridge Gas respectfully submits that the OEB should maintain the existing procedural schedule to which Enbridge Gas has already committed resources.

Finally, in the event the OEB grants any extension for intervenor submissions, Enbridge Gas may require additional time to submit its reply argument, noting the obvious inequity of intervenors having almost 500% more time to prepare submissions than Enbridge Gas. We will make that assessment at the appropriate time and file an additional extension request if required, despite our reluctance to see this proceeding delayed any further.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

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