

# Elson Advocacy

December 12, 2025

**Ritchie Murray**

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

Dear Mr. Murray,

**Re: EB-2025-0065 Enbridge Gas Inc. 5-Year Gas Supply Plan**

I am writing to provide submissions on behalf of Environmental Defence regarding Enbridge Gas Inc.'s proposed 5-Year Gas Supply Plan ("GSP"). Environmental Defence's primary submission is that the gas supply plan should explicitly consider the impact of gas supply decisions on the viability of future supply-side Integrated Resource Planning ("IRP") alternatives. This is particularly important to maintain the viability of IRP alternatives to reinforcements of the Dawn-Parkway system. If these factors are not considered, Enbridge may fail to acquire capacity when it is available, or allow existing contracts to expire, and therein lose an opportunity to cost-effectively avoid a reinforcement project.

In addition, public communications and marketing regarding certified gas should be monitored to ensure gas customers are not misled. However, Environmental Defence is not seeking an order in relation to this topic.

The submissions relate to Issues 1, 2 (d) and 8 of the OEB's approved Issues List. Those Issues ask:

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?

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):

d. Achieving public policy objectives

Issue 8: 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?

Each submission is addressed below.

## 1. Supply-side IRP Considerations

The gas supply plan should explicitly consider the impact of gas supply decisions on the viability of future supply-side IRP alternatives. For example, Enbridge should be encouraged to explicitly consider the impact of contracting decisions on the Mainline insofar as they could impact the viability or cost-effectiveness of supply-side IRP alternatives to reinforcing the Dawn-Parkway system.

Increased use of the Mainline for gas supply to Enbridge's northern, central and eastern distribution areas could reduce pressure on the Dawn-Parkway system. This, in turn could reduce or eliminate the need for the proposed expansion projects on the Dawn-Parkway system (Kirkwall-Hamilton NPS 48 and Dawn Enniskillen NPS 48). The current estimated costs of those projects are \$209.5 million and \$298.3 million respectively.<sup>1</sup> If capacity becomes available on the Mainline, it is critical that Enbridge consider whether to contract for that capacity to maintain the viability of a supply-side alternative as part of an overall IRP alternative. If that analysis is not undertaken and is not reviewed by the OEB, it is possible that an opportunity could be lost to another purchaser.

This approach aligns with the OEB's gas supply guiding principles by prioritizing long-term cost efficiency for customers. It further aligns with the government's new integrated energy plan, "Energy for Generations," in which cost avoidance related to overbuilding is specifically identified as a goal and positive outcome of integrated energy planning.<sup>2</sup>

This will require that Enbridge further incorporate facilities impacts into its gas supply planning process instead of maintaining strict boundaries between GSP, asset management planning and integrated resource planning.<sup>3</sup> While we were happy to see that some information about facilities avoidance was included in the GSP,<sup>4</sup> Enbridge also took the position that questions regarding the potential impact of gas supply decisions on the Dawn-Parkway expansion projects were out of scope for the GSP proceeding.<sup>5</sup>

Moreover, in response to interrogatories on this topic, Enbridge stated that there were no infrastructure projects "resulting directly and solely" from the GSP.<sup>6</sup> This answer obscures the reality, which is that gas supply decisions and infrastructure decisions work in tandem to respond to customer demand. Enbridge's answer also suggests that gas supply decisions do in fact impact infrastructure needs, despite not being the direct and sole cause. Again, an approach that unnecessarily siloes the various planning processes will fail to prioritize cost-effectiveness in its

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<sup>1</sup> Enbridge Gas Inc., Asset Management Plan 2026 Addendum, October 30, 2025, Appendix A, p. 24 ([Link](#)).

<sup>2</sup> Energy for Generations, Ontario's Integrated Plan to Power the Strongest Economy in the G7, June 2025, p. 120 ([Link](#)).

<sup>3</sup> Exhibit I.2-STAFF-12; Exhibit. I.2-ED-7.

<sup>4</sup> EGI, 5-Year Gas Supply Plan, May 1, 2025, pp. 66-68.

<sup>5</sup> Exhibit I.2-ED-7.

<sup>6</sup> Exhibit I.2-ED-5.

totality. This is implicit in the OEB Staff's previous recommendation that Enbridge include potential facilities impacts in its GSP going forward.<sup>7</sup>

Enbridge may argue that it is sufficient to wait to until leave-to-construct proceedings for Dawn-Parkway reinforcements to conduct IRP assessments and submit IRP evidence to the OEB. However, this could be too late and result in missed opportunities. An IRP alternative could involve a mixture of supply-side and demand-side measures. Again, Enbridge may lose opportunities to meet demand via supply-side alternatives to the Dawn-Parkway pathway (e.g. via the Mainline or purchases at Niagara) by allowing contracts to expire or by declining to purchase capacity that opens up. By the time a leave-to-construct proceeding takes place, it will be too late.

As it relates to the Mainline specifically, we understand that Enbridge has identified increased scarcity as a challenge and has indicated that they will continue participating in TCPL open seasons.<sup>8</sup> Any associated costs should be balanced against the potential \$400 million investment that could be required in Dawn-Parkway system reinforcements if alternatives cannot be secured.

Based on Enbridge's evidence, a number of contracts are set to expire during the GSP term, including in October 2026.<sup>9</sup> We further understand, based on their evidence that a number of factors impacting capacity on the Mainline are transient (ex: operational and maintenance issues on alternative routes).<sup>10</sup> This supports the need to remain vigilant in capturing opportunities as they arise to contract for capacity on the Mainline, including through permanent assignments of existing capacity.

### **Transparency in marketing**

As the 5-year GSP is implemented, Enbridge should ensure that all marketing and customer communications provide full transparency regarding the gas supply portfolio. Although we are not asking for an OEB order in this regard, we believe it is important to flag the issue. In particular, it is important that all communications clearly delineate between Certified Natural Gas/Responsibly Sourced Gas (CNG/RSG) and Renewable Natural Gas. As the Board is aware, these seemingly related gas sources have major differences in their environmental impacts. Renewable Natural Gas is created from biogenic sources and can even have a net negative carbon footprint by avoiding direct emissions of methane to the atmosphere (e.g. capturing biogenic methane that would otherwise be lost to the atmosphere). In contrast, Certified Natural Gas is 100% a fossil fuel and therefore has the exact same combustion emissions as non-certified gas.

In our comments on Enbridge's 2022 GSP update, Environmental Defence highlighted some of the key limitations of CNG/RSG in relation to potential upstream emissions reductions:

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<sup>7</sup> EB-2024-0067, OEB Staff Report, Review of 2024 Annual Update to Enbridge Gas Inc. Natural Gas Supply Plan, p. 35.

<sup>8</sup> Exhibit I.2-ED-9.

<sup>9</sup> Exhibit I.2-ED-6, Attachment 1.

<sup>10</sup> Exhibit I.2-ED-9.

- **No improvements required:** RSG certifications do not require suppliers to invest additional time or funds into improving their processes with respect to the environmental impact or any other aspect of their business. Therefore, certification cannot be said to actually result in any measurable carbon reductions or behaviour improvements. Instead, it simply reflects pre-existing differences in extraction practices.
- **Non-stringent criteria:** RSG certifications do not include stringent criteria, particularly when it comes to the environment. For instance, MiQ provides different grades for different levels of carbon emitted during extraction. However, gas with an “F” grade is nevertheless still “certified.”
- **Carbon-intense:** The only responsibly sourced gas is gas that is sourced from bio-waste (renewable natural gas) or electrolysis (green hydrogen). Fossil gas is never responsibly sourced because it remains a fossil fuel with a high carbon footprint when burned. Fossil gas contributes roughly one-third of Ontario’s carbon emissions. This would remain exactly the same even if 100% of that gas was so-called RSG as there would be no impact on the carbon arising from combustion.
- **No investments in improvements:** The limitations of RSG are highlighted by its extremely low cost. Enbridge is planning to purchase RSG for *no* incremental cost. Enbridge will be getting what it pays for – nothing.<sup>11</sup>

Past marketing by Enbridge has not reflected these limitations. In one press release, Enbridge stated as follows:

“The natural gas currently purchased by Enbridge Gas, must meet strict industry-wide criteria for quality, and the addition of RSG exceeds the current standards to ensure sustainability across the entire value chain. The RSG process includes independent, third-party certification, and the natural gas is produced under specified best practices that aim to minimize environmental and community impacts.”<sup>12</sup>

It is not accurate to say that CNG/RSG ensures sustainability across the entire value chain nor that it minimizes environmental impacts. Again, CNG/RSG has 100% of the combustion emissions as non-certified gas and may have limited or no impacts on the upstream carbon emissions from extraction and transportation. These limitations were recognized in this proceeding when Enbridge stated that CNG/RSG “cannot directly achieve emissions reduction”<sup>13</sup> for customers and that “topic areas covered by certification programs differ between programs as does supplier performance... which creates difficulty in establishing relevant performance metrics and procurement targets.”<sup>14</sup>

<sup>11</sup> EB-2022-0072, Comments of Environmental Defence, May 24, 2022 ([Link](#)) EB-2022-0072, EGI Compendium, May 3, 2022, pp. 20-23 ([Link](#)); EB-2022-0072, Stakeholder Conference, May 5, 2022, Transcript, pp. 111-126 ([Link](#)).

<sup>12</sup> “Enbridge Gas partners with EQT Corporation to purchase and deliver responsibly sourced natural gas” Toronto, Nov. 10, 2022 ([Link](#)).

<sup>13</sup> Exhibit I.2-PP-5.

<sup>14</sup> Exhibit I.2-STAFF-14.

Unclear messaging could mislead customers, which in turn could deter them from undertaking energy efficiency or electrification measures. In order to avoid any potential confusion, Enbridge should limit future marketing that includes CNG/RSG or at least ensure that CNG/RSG's limitations and qualifications are clearly identified.

### **Conclusion**

For the reasons outlined above, Environmental Defence asks that the OEB direct Enbridge to ensure that the gas supply plan explicitly considers the impact of gas supply decisions on the viability of future supply-side IRP alternatives, particularly for Dawn-Parkway reinforcement projects. This is necessary to ensure we do not lose opportunities to cost-effectively avoid or defer some of the most expensive infrastructure projects planned by Enbridge in the coming years.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', written over a faint horizontal line.

Kent Elson