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December 15, 2025

**EB-2025-0065 Enbridge 2025 Gas Supply Plan
Pollution Probe Submission**

Dear Mr. Murray:

In accordance with Ontario Energy Board (OEB) direction, please find attached the written submission from Pollution Probe. This is being provided in advance of the December 18, 2025 deadline to further enhance coordination.

Respectfully submitted on behalf of Pollution Probe.



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ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
2025 Five-Year Gas Supply Plan**

POLLUTION PROBE SUBMISSION

December 15, 2025

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1. Introduction and Overview

Enbridge Gas Inc. (Enbridge) filed a five-year gas supply plan with the Ontario Energy Board (OEB) on May 1, 2025. The five-year gas supply plan covers the period of November 1, 2025 to October 31, 2030. The application also includes Enbridge's annual gas supply plan update for the 2024/2025 gas year.

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 plan¹. The preceding five years of annual rolling five-year gas supply plans represent the first five years since the OEB established the Gas Supply Framework (Framework)². This proceeding represents an appropriate opportunity to reflect on what is working or not working, and to make adjustments as appropriate. In the intended spirit of continuous improvement and better results for ratepayers, the OEB can make enhancements or improvements to gas supply planning through an adjudicated approach at any time and also update the Framework in the future, as appropriate.

Enbridge's gas supply related activities represent one of the largest regulated utility activities by total ratepayer cost. Gas supply portfolio activities also have a broad impact across the full range of regulated utility activities, from system demand/supply planning to integrated resource planning options analysis, to alternative energy procurement (including renewable natural gas and hydrogen). Enbridge's gas supply function also manages one of North America's largest set of gas storage assets which are used for regulated and unregulated purposes. The 2025 gas supply plan alone relates to annual costs of over \$5 billion, and over \$2 billion in pure commodity costs³. Due to the significance and importance of the gas supply plan, the OEB Staff developed hearing schedule for this proceeding aligned with a 'Greater than \$500 million revenue requirement performance standard' (i.e., a decision within 355 days of determining the application is complete)⁴. The OEB has decided to leverage a typical written hearing format for this proceeding.

Gas supply issues and related costs are relevant to several regulatory proceedings, including rates cases, quarterly rate adjustment mechanism (QRAM) applications, Integrated Resource Plan (IRP) projects, Variance and Deferral Account applications, etc. This illustrates the broad and significant impact and cost related to the gas supply function, which includes gas transportation arrangements and gas contracting. Enbridge provided a sample list in their evidence of related proceedings⁵ and there are certainly

¹ EB-2024-0067 OEB Staff Report Enbridge 2024 GSP_20250115, Section 3.2.

² EB-2017-0129 Report of the Board_Gas Supply Plan Framework_20181025.

³ Exhibit I.6-PP-26, Attachment 1, Page 24.

⁴ <https://www.rds.oeb.ca/CMWebDrawer/Record/897875/File/document>

⁵ EGI_5-Year Gas Supply Plan_updated 20250904, Table 22, page 80.

more that can be added to that list⁶. There is currently no OEB proceeding that looks at all the gas supply issues collectively. This has resulted in gas supply issues being scattered across a variety of proceedings without an overarching view to consider how these elements fit together in a cost-effective manner. Given the broad impacts of gas supply activities and the significant scale of related ratepayer costs, it is important that gas supply is considered (when possible) in a holistic manner and not segmented into disparate siloed parts. Within each proceeding is a limited set of evidence that is considered and evidence filed can be contradictory when compared across proceedings⁷.

What governance, approach and process(es) are required to ensure an objective and transparent approach is used to connect all these gas supply issues and that appropriate adjustments are made to meet the evolving needs of Ontario's energy future in a cost-effective manner? What is the role and linkage between each of these proceeding that includes gas supply related issues and the annual gas supply plan review proceeding? What approach is needed to ensure that the review of gas supply issues are not conducted in a siloed manner and how can the OEB ensure that the sum of the parts optimizes ratepayer value and policy outcomes aligned with the public interest? What measurable progress has been made over the past five years and how is the increased value for ratepayers measured by the gas supply scorecard results? These are just a few questions that the OEB will needs to think about as it reflects on the previous five years of annual gas supply plan reviews, the 2025 gas supply plan and as the OEB considers appropriate improvements needed for annual gas supply plans and for the Framework.

The OEB approved Issues List in this proceeding includes an appropriately 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 better consider and include supply-side IRP considerations where those could be impacted by gas transportation arrangements and/or gas contracting. Other relevant topics have been discussed during the discovery phase of the proceeding. For example, Enbridge provided modeling of customer

⁶ Including IRP related proceedings which include supply side alternatives. Also, the current 2026 AMP (filed in EB-2020-0091) specifically includes a connection to the Gas Supply Plan and includes a number of gas supply projects in the Capital plan. Those projects are often reviewed in rates cases and/or Leave to Construct applications and were not included in Enbridge's gas supply plan.

⁷ For example, Enbridge evidence submitted in the EB-2022-0200 Rebasing proceeding suggested that the natural gas system is in decline (e.g. death spiral) and that risks to the utility were growing. This was noted in EB-2022-0200 dec_order_EGI_2024 Rebasing_Phase I_20231221, page 10. Enbridge evidence in other proceedings suggests the opposite. The 2026 Asset Management Plan Update filed in EB-2020-0091 includes incremental gas supply projects without any analysis of them becoming stranded prior to full depreciation. Many more examples exist of direct links to the gas supply portfolio.

disconnections from the system⁸ and Enbridge noted that updates to this modelling and its impact on natural gas system will need to be done as part of the future gas supply plan analysis⁹. Enbridge also filed a new IRP process flow (developed in August 2025) to represent how gas supply connects to its current IRP processes¹⁰. Comments related this new proposed approach are included under Issue 8, below.

The OEB's requirement for Enbridge to file their Argument in advance of intervenors and OEB Staff has been helpful and informative¹¹. Enbridge did not state any positions or preferences during the Technical Conference, but in its Argument Enbridge notes that it does not propose any changes to the current Framework. Enbridge notes 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. However, Enbridge concludes that it is not clear to them 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 suggests that it will address any such items in their Reply Argument¹². It seems peculiar that the process that the OEB put in place for this proceeding, coupled with the previous five years of gas supply plan stakeholder input, has not provided insight on the issues important to stakeholders and areas for improvement. It is always better when the process enables Enbridge to consider stakeholder feedback prior to developing the gas supply plan, rather than leaving that to Reply Argument.

In cases where Enbridge is not aware of stakeholder issues and opportunities to improve the gas supply plan and related Framework, the best approach is to discuss that early in the process so that the plan can be adjusted to bridge those gaps. Leaving that to the final step of the proceeding has the potential to strand the opportunity for contiguous improvement that the process was intended to enable. This identifies a clear opportunity to improve the process going forward.

⁸ Exhibit I.2-PP-2, Attachment 1, Page 9.

⁹ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 149, line 1 to page152, line 16.

¹⁰ Exhibit I.6-PP-15, Attachment 1 and OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 148, lines 6 to 11.

¹¹ PO 2_EGI GSP_20251105.

¹² EGI_ARG_20251125, paragraph 37.

2. Summary of Recommendations

This section provides a summary of recommendations which should be read in conjunction with the broader document. Pollution Probe thought that it would be helpful to the OEB to provide this summary up front and prior to delving into the specifics of each issue.

Issue 7 in this proceeding indicates: *“Should the OEB review and/or amend the Framework and/or annual review process (including timing)?”*. If the OEB agrees that the Framework should be reviewed and/or amended, then Pollution Probe has assumed that would be conducted through a separate generic proceeding. However, the OEB does not need to wait to make certain improvements through this proceeding. This is similar to what the OEB has done with the IRP Framework, where clarifications, enhancements and adjustments have been made through several OEB proceeding decisions. It is assumed that those will be integrated into the Framework when the Framework is updated. Implementing certain improvements now enables these to be applied to future gas supply plans, starting with the 2026 gas supply plan.

It is recommended that the OEB:

- Include adjustments and improvements identified through this proceeding as part of the Decision in this proceeding and applicable starting with the 2026 gas supply plan. If appropriate, the OEB can merge continuous improvement updates if the Framework is issued in an updated format in the future.
- Plan a more detailed review and update of the Framework as part of a future generic proceeding. An adjudicated review of the 2026 gas supply plan would help the OEB understand how the improvements included from this proceeding have been applied and what the appropriate timing should be for the formal Framework review.
- Consider adding a procedural step early in the annual gas supply plan procedural process to solicit input on the level of appropriate adjudication required based on the details and gaps of each annual gas supply plan filed. Given the amount of updates required to be applied for the 2026 gas supply plan, it is recommended that the OEB plan for that reviewed to be conducted in an adjudicated manner.
- Require Enbridge as part of their 2026 gas supply plan to include an analysis of the progress, customer value and scorecard quantitative improvements applied to gas supply plans. The results should be grouped by topic under the Framework’s three guiding principle categories. If any improvements have not yet been applied, Enbridge should indicate how and when they will be applied.
- Direct Enbridge to update its gas supply related manual and guidelines to reflect all the elements required in the Gas Supply Framework and outcomes of this

proceeding, including all the guiding principles, measurement using scorecards aligned with Framework requirements, and elements of continuous improvements to enhance ratepayer value. Updated materials should be filed with the 2026 gas supply plan for review.

- Reiterate the need for Enbridge to include multiple demand scenarios aligned with policy and the energy transition in order to plan appropriately for the future. One example is the Provincial scenario including the Ontario Pathways Report¹³.
- Require a full review and refresh of gas supply scorecard metrics and targets be undertaken as part of the 2026 gas supply plan development. This refresh should include a review of all previous stakeholder comments provided and include an opportunity for stakeholder review of the updated draft scorecard prior to filing the 2026 gas supply plan. Enbridge should also indicate how each scorecard metric aligns with the OEB's requirements.
- Require that the full 10-year Enbridge forecast be included when developing the annual gas supply plan. Currently the 10-year forecast is truncated to five years for gas supply plan development. Using the full forecast would provide greater alignment with Enbridge's planning process and provide greater ability to assess longer term trends and opportunities to leverage cost-effective solutions.
- Require Enbridge to file the strategy within which gas supply portfolio planning and execution is conducted. Currently, Enbridge does not have a gas supply strategy¹⁴.
- Require Enbridge as part of its 2026 gas supply plan filing to catalogue all the OEB directions from relevant proceedings (including Rebasing Phases 2 and 3) and map what changes have been made to the 2026 gas supply plan to address them.
- In alignment with standard practice, it is recommended that the OEB include in the procedural orders for the annual gas supply plan proceeding a deadline following the stakeholder conference for Enbridge to file undertaking responses. This will help ensure that the annual process is normalised to what occurred in this proceeding and what is typical for similar proceedings.
- Indicate that the Framework represents the minimum requirements and that a broader gas supply portfolio assessment is recommended to ensure that ratepayer and policy value is enhanced over time. This includes, but is not limited to leveraging the gas supply function to achieve cost-effective ratepayer and policy outcomes as part of the broader integrated utility portfolio.
- Reaffirm the importance of IRP and supply side option consideration as part of the gas supply function in working with other related utility functional areas.

¹³ Ontario Ministry of Energy and Electrification's Cost Effective Energy Pathways Study for Ontario

¹⁴ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 164.

- Note that the updated IRP process flow diagram¹⁵ submitted in this proceeding was not reviewed as part of this proceeding and will need to be reviewed in a future proceeding (perhaps the IRP Framework review, if appropriate).

3. Submissions by Issue

The following are the submissions by issue in accordance with the Issues List.

Enbridge Gas's 5-Year Gas Supply Plan

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?

The Gas Supply Framework sets out the OEB's approach for the assessment of the rate-regulated natural gas distributors' (distributors) supply plans. It identifies three guiding principles to be used in assessing the distributors' GSPs:

- **Cost-effectiveness** – The GSP will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and executing the supply plan in an economically efficient manner.
- **Reliability and security of supply** – The GSP will ensure the reliable and secure supply of natural gas. Reliability and security of supply is achieved by ensuring gas supply to various receipt points to meet planned peak day and seasonal gas delivery requirements.
- **Public policy** – The GSP will be developed to ensure that it supports and is aligned with public policy where appropriate.

Pollution Probe submits that the 5-year gas supply plan does not appropriately reflect and balance the three OEB gas supply guiding principles in a way that is prudent and delivers value to customers.

This proceeding provides the appropriate opportunity to start closing those gaps for the future and enhance the value from the gas supply plan. It appears that there is a gap between what has been included in the gas supply plan and the requirements outlined in the Framework. Issues are outlined under each relevant issue and examples include scorecard effectiveness and gaps related to the public policy principle.

The public policy principle has the least fulsome and objective analysis and the gas supply plan fails to provide tangible measurement of any actual progress (via the

¹⁵ Per Exhibit I.6-PP-16 and discussed in greater detail under Issue 8.

scorecard), despite this being flagged as an opportunity for improvement over the past five years. It appears that other Enbridge adjudicated proceedings¹⁶ receive more focus and attention to address related policy issues, but that this analysis was not carried over to the gas supply plan. It is not clear why relevant information that was filed in other proceedings was not included in this gas supply plan, even though the information was already available.

Enbridge confirmed that the current Framework does not provide much detailed guidance to Enbridge related to public policy¹⁷. As noted, Pollution Probe believes that the OEB's Gas Supply Framework requires Enbridge to identify and include all relevant policy considerations when developing its gas supply plan. This was not done for the 2025 gas supply plan. Additional information specific to this issue are included under Issue 2d/e.

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

Pollution Probe includes issues that impact demand forecast and supply side analysis under other sections in this submission, and Pollution Probe is aware that additional relevant considerations will be included in other submissions, including supply side alternatives. The gas supply plan is a forward looking document, which would provide more robust and cost-effective options if the full set of tools were included in the gas supply plan. Examples, include alternate demand scenarios, IRP alternatives and interruptible rate options analysis. The absence of these tools in any meaningful manner suggests that they are not as important as traditional gas supply and capital solutions. Avoiding incremental and costly supply not only is the most cost-effective option, but can mitigate incremental capital expenditures and related stranded asset risks.

Additionally, Enbridge has been assessing its system capacity as part of the hydrogen system feasibility study it discussed in the Rebasing Phase 1 proceeding¹⁸. An initial report was recently filed with the 2026 Asset Management Plan Addendum¹⁹. Considering the results of that interim study to inform system capacity options could be of value.

¹⁶ For example, the concurrent Phase 3 Rebasing proceeding under EB-2025-0064.

¹⁷ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 144, lines 6-7.

¹⁸ EB-2022-0200.

¹⁹ EB-2020-0091 EGI_AMP_2026 Addendum_20251030.

c. Risk mitigation analysis

As noted below, the metrics and scorecard used by Enbridge in this gas supply plan and over the past five years is not sufficient to measure the avoided risk and quantitative tangible value for ratepayers. Improvements to the scorecard will help measure and improve the actual outcome measurements and risk mitigation. Including the other supply/demand management alternatives noted will also help ensure that the most cost-effective options are considered to mitigate risk.

d. Achieving public policy objectives

As noted above, there are gaps in the 2026 gas supply plan identification and consideration of public policy. Enbridge has not included a fulsome consideration of public policy issues and objectives in its gas supply plan. This could be in part due to the gaps in engagement and consultation when the gas supply plan is developed²⁰. It is important to integrate the broader range of policy issues than only those internally important to Enbridge. In order to accurately reflect the current and evolving policy environment, it will be necessary for the gas supply plan to identify and include a more fulsome policy inventory and analysis. This issue has been raised by the OEB in other related proceedings, with appropriate OEB direction to close those gaps²¹.

It is interesting to note that although the other two Framework guiding principles are included in Enbridge's Gas Supply Procurement Policies and Practices manual, the public policy element is absent²². The gas supply manual also has no reference to scorecards, metrics or the principles on annual continuous improvement. There appears to be a lack of connection between the Framework requirements and Enbridge's internal guidance documents. Enbridge's gas supply guidance manual has not been updated since July 2021²³. It should not be surprising that some of the areas (like public policy and scorecard measurement) have not been aligned over the past five years since they are not part of Enbridge's documented processes²⁴. Updates to reflect current requirements should be made prior to filing of the 2026 gas supply plan.

Additional comments and considerations related to public policy are included under Issue 2e, below.

e. Procurement process and policy analysis

²⁰ Enbridge confirmed that no external consultation or third-party review is conducted when developing the annual gas supply plan.

²¹ E.g. the range of policy and energy transition issues covered in EB-2022-0200.

²² Exhibit I.2-PP-1.

²³ Exhibit I.1-SEC-1, Attachment 1, Page 1.

²⁴ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 156.

Pollution Probe understands that other stakeholders intend to include details related to commodity procurement and options. However, there are some elements where Pollution Probe has specific comments incremental to those we understand will already be covered.

One area relates to the relatively recent addition of certified natural gas in the gas storage procurement and also in the gas supply scorecard. There is no reference of certified natural gas in Enbridge's Gas Supply Procurement Policies and Practices manual and it is unclear how this became part of Enbridge's procurement approach²⁵. Enbridge indicates that procuring certified natural gas is not part of its strategy and also confirmed that there is no strategy document related to gas supply²⁶.

Certified natural gas does not pass along any credits or benefits to Enbridge customers, but is simply a label applied to natural gas purchased if production meets any number of a broad range of criteria developed by two organisations that undertake the certifications²⁷. The OEB has not assessed the credibility or value related to "certified natural gas". It is not clear what the purpose and value of procuring certified gas is.

Enbridge indicated that "Percentage of certified gas in the portfolio" was added to the performance metrics as part of the 2023 Annual Update in response to stakeholder interest and that this metric does not quantify customer benefit because customers cannot directly achieve emissions reduction by using certified gas²⁸. On further investigation, Enbridge confirmed that it did not have a record of any stakeholder request to include certified gas to the portfolio or scorecard²⁹. The actual amount of gas purchased that comes with the certification is also very small (approximately 4.5%) and there is no plan to increase those volumes³⁰. It is important that customers and stakeholders are clear that certified gas does not result in any actual environmental benefits that can be measured or reported by Enbridge as part of the gas supply plan, so that the public is not misled.

Since there are no objectives to buy certified gas above non-certified natural gas and that no actual benefits flow to Enbridge customers³¹, it does not appear to make sense to include it in the scorecard. It is recommended that this metric be removed. If the scorecard is a tool crowded with other information that is not related to performance and customer benefits, it will dilute the purpose and value of the scorecard.

²⁵ Exhibit I.1-SEC-1, Attachment 1.

²⁶ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 164.

²⁷ Exhibit I.2-ED-10c and Exhibit I.2-TFG/M-3.

²⁸ Exhibit I.2-PP-5d.

²⁹ Exhibit JT1.15.

³⁰ Exhibit I.2-ED-10.

³¹ Exhibit I.2-STAFF-14.

Recently, the Province released two policy documents to inform the energy policy and energy pathways in Ontario. The first was the Ontario's Energy for Generations (Integrated Energy) Plan³². Enbridge refused to answer certain questions on how the shifting Ontario energy policy landscape was considered or applied to Enbridge's 2025 Gas Supply Plan³³. Enbridge claimed that consideration of this core policy information was out of scope, although Enbridge does note that the Integrated Energy Plan suggests that hydrogen and/or renewable natural gas (RNG) may play larger roles in the future³⁴. Separately, Enbridge acknowledged that it has not actually considered the impacts of the Integrated Energy Plan and is waiting to act only after it receives direction from the OEB³⁵. Enbridge indicates that it does not have a plan to incorporate the objectives, priorities, and direction outlined in the Integrated Energy Plan into its future gas supply planning at this time. Given that it is already a requirement for Enbridge to include relevant policy considerations in the annual gas supply plan, it is not clear why Enbridge is waiting for additional OEB direction.

The evidence in this proceeding contradicts Enbridge's evidence in other proceedings, including the Phase 3 Rebasing proceeding (occurring in parallel) where Enbridge does analyse the Integrated Energy Plan and extrapolates its analysis to conclude that the document provides clear policy direction from the Ontario Government for future strong growth of natural gas³⁶. Enbridge's analysis of the Integrated Energy Plan and opinions filed in the Rebasing proceeding occurred on or before July 2025 and then in September 2025, the interrogatory responses in this gas supply proceeding were filed to indicate that no review of the Province's Integrated Energy Plan had been conducted. It would be of value to understand how this gap occurred, but it is of significantly more value to bridge those gaps for the future gas supply plans to ensure that a more fulsome evaluation of policy is included in the gas supply plan. Failure to include current information reduces the ability for the gas supply plan to deliver real time customer value in alignment with policy objectives.

The second policy document released in parallel with Ontario's Energy for Generations Plan is the Ontario Ministry of Energy and Electrification's Cost-Effective Energy Pathways Study for Ontario³⁷. Enbridge notes that it was aware of this policy document. Figure ES-1 of this report included an Ontario scenario aligned with the energy transition, per below.

³² See Exhibit I.6-PP-10 and [Energy for Generations | ontario.ca](#)

³³ Exhibit I.6-PP-10.

³⁴ Exhibit I.6-PP-12.

³⁵ Exhibit I.2-STAFF-11a.

³⁶ EB-2025-0064 Exhibit I.2.5-STAFF-5.

³⁷ Exhibit I.6-PP-12 and [Cost Effective Energy Pathways Study for Ontario](#)

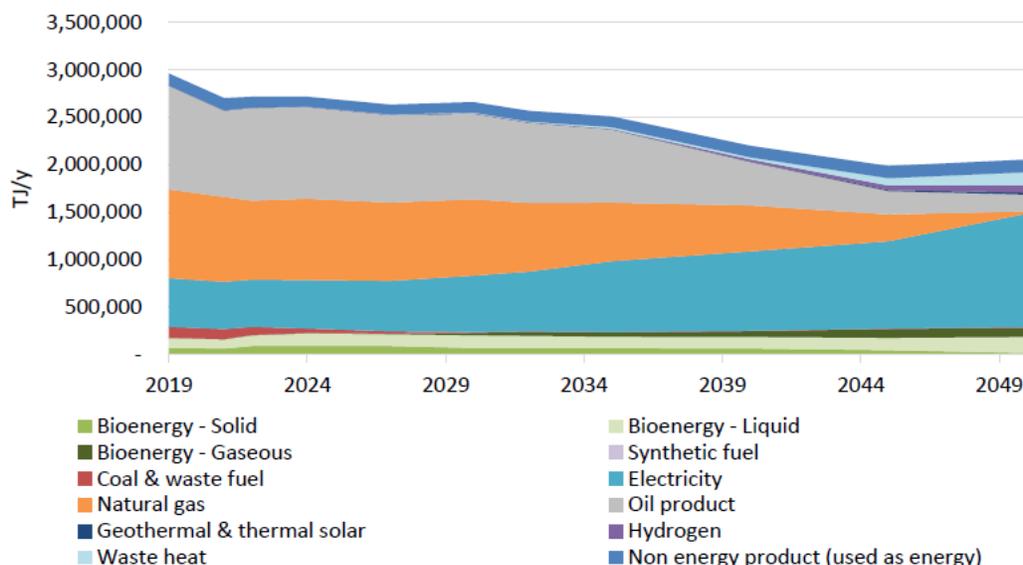


Figure ES-1. Final energy consumption (TJ/y) by fuel type from 2019 to 2050 for the NZ50 IP

The gas supply plan does not consider the potential impacts of net zero scenarios such as that included in the Provincial Pathways Study. Enbridge indicates that doing scenario analysis using a scenario like that outlined in the Provincial study is not in scope for their demand planning and gas supply plans. The OEB has identified previously the need and importance for Enbridge to consider objective scenarios aligned with the energy transition in order to plan appropriately for the future³⁸. Furthermore, there is an additional requirements flowing from the Integrated Energy Plan for Enbridge to consider multiple demand scenarios for its analysis.

f. Performance measurement

Enbridge indicates that it has created performance metrics to monitor the effectiveness of the gas supply plan. Enbridge indicates that 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 suggests that it 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 required³⁹. It appears that the Enbridge evidence does not actually provide any specific details on the specific enhancements, innovation, updates or other improvements it believes have been achieved by since the annual gas supply plan process was established in 2018. Enbridge's annual plan approach has been largely static, with minimal plan improvements⁴⁰ including those related to the gas supply scorecard.

³⁸ EB-2022-0200 dec_order_EGI_2024 Rebasing_Phase I_20231221.

³⁹ EGI_ARG_20251125, paragraph 36.

⁴⁰ Transcript EB-2024-0067 Stakeholder Conference, Page 7 lines 14-15.

The metrics and scorecard used over the past five years fails to measure quantitative improvements that result in ratepayer value. Many of the metrics included have no real ability to measure value the way they are stated and measured. Stakeholder recommendations over the past five years to improve the scorecard metrics to become more meaningful, current and relevant have not been implemented.

The Framework indicates that:

“...it is expected that a distributor will develop performance metrics that reflect the criteria the OEB has established to demonstrate how the principles have been achieved. The measures should demonstrate the value proposition for customers and how it balanced the Framework’s guiding principles. Effective metrics will allow the OEB to focus its assessment on results that deliver value for customers and not a line-by-line review of expenditures”⁴¹.

Furthermore, the Framework also indicates⁴²:

In reviewing distributors’ performance metrics, the OEB’s considerations are:

- *A focus on strategy and results, not activities.*
- *Demonstration that distributors consider opportunities for continuous improvement in their planning.*
- *Demonstration of value to customers.*
- *Performance metrics that will accurately measure whether the plans are cost effective and reliable and support public policy.*
- *As noted above, Enbridge’s Gas Supply Procurement Policies and Practices manual includes no focus on effective scorecard measurement or continuous improvement of results.*

The scorecard metrics created and used by Enbridge provide little value in meeting these intended objectives. Additionally, many of the metrics indicate N/A or C for results, which is not transparent or informative. For the RNG metric added, the results have been noted as zero in the scorecard for the entire period. Does that mean that progress is occurring?

When reviewing the scorecard and results over the past five years, it is not possible to determine if value is being created for customers or what specific outcomes are occurring to align with policy objectives. Pollution Probe understands that this is the first time that an OEB panel is having a chance to review the effectiveness of the gas supply scorecard in accordance with the Framework requirements. It is recommended that a

⁴¹ EB-2017-0129 Report of the Board_Gas Supply Plan Framework_20181025, page 11.

⁴² Ibid, page 12.

full review and refresh of gas supply scorecard metrics and targets be undertaken and filed as part of the 2026 gas supply plan. This refresh should include a review of all previous stakeholder comments provided and include an opportunity for stakeholder input and review of the updated Enbridge draft scorecard prior to filing of the 2026 gas supply plan.

Enbridge has also included metrics related to RNG and hydrogen on the gas supply scorecard, but these metrics don't actually track policy progress against emission reductions related to the carbon intensity of the RNG and hydrogen procured⁴³. The only reason why Enbridge customers would pay significantly more for RNG or hydrogen, is if the lifecycle emissions were significantly lower than that of natural gas (i.e. real emissions are going down). These issues have been covered in detail during the Rebasing proceeding (Phases 1 and 2). Charging ratepayers more without being able to attribute emission credits associated with emission reductions is illogical. A more useful scorecard metric could be the annual and rolling total emission intensity of RNG and hydrogen purchased. Recently Enbridge requested OEB approval to increase the blending subsidy to customers in the hydrogen blending pilot project⁴⁴. The gas supply function at Enbridge would need to procure more (clean?) hydrogen if the OEB were to approved this request. If Enbridge is proposing to increase hydrogen purchases over the gas supply term, it should include the details on the estimated lifecycle carbon intensity benefits related to those proposed hydrogen purchases. This kind of analysis is prudent if Enbridge believes that increasing purchases of hydrogen will occur over the gas supply plan term.

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

Enbridge indicates that there is no suggestion that Enbridge's gas supply plan outlook evidence is insufficient or otherwise lacking⁴⁵. It is not clear what specific references on the proceeding record Enbridge is referring to when it makes this conclusion. The OEB is aware that there has been and continues to be a large discrepancy in the factors Enbridge uses to define its outlook for natural gas demand in Ontario, including but not limited to the energy transition impacts. The OEB is aware that the energy transition is real and continues to accelerate and that there are numerous policy initiatives underway in Ontario to support this transition and the trend toward electrification.

Enbridge indicated that it develops Energy Transition Adjustments (the Adjustments) based on the most up-to-date information available at the time of forecasting. Each

⁴³ Exhibit I.6-PP-21.

⁴⁴ EB-2019-0294 EGI_LCEP Blend Increase_20251015.

⁴⁵ EGI_ARG_20251125, paragraph 40.

year, Enbridge conducts a review of external signals, such as energy policy signals, market trends, stakeholder feedback, and internal data to assess potential impacts on natural gas demand for Enbridge Gas's business and system planning over a 10-year forecast period. Enbridge Gas reviews the Adjustments annually and determines if changes are warranted based on the foregoing⁴⁶. However, there is additional information required to validate if the outlook included in the gas supply plan is reasonable. For example, Enbridge provided its probability of customers disconnecting based on number of appliances⁴⁷. Enbridge confirmed that this assumption is simply based on internal Enbridge opinion after interpreting information from a customer survey. There was no actual analysis done that could be provided to the OEB or stakeholders⁴⁸. Enbridge indicated that it has updated its assumption and will provide that for OEB and stakeholder consideration in the 2026 gas supply plan⁴⁹. These are important assumptions related to the energy transition and the gas supply plan.

External consultation and input is important to ground Enbridge's gas supply plan in reality. Enbridge operates in more than 300 municipalities and more than 20 First Nations throughout Ontario⁵⁰. Enbridge refused to provide energy transition impacts and analysis related to community energy and emissions planning across Ontario⁵¹. Enbridge also refused to explain heating degree day (HDD) variance driver between gas supply plan assumptions and actual trend results⁵². An overly narrow focus creates a gap in the assumptions and transparency needed to ensure that the gas supply plan meets requirements under the Framework.

Enbridge confirmed that its demand forecast, and gas supply plan modelling is prepared on the basis of a 10-year horizon. The five-year gas supply plan uses truncated information from that process⁵³. It would be more valuable and informative to include the full 10-year information in the annual gas supply plan. Even though information may be less accurate the further out the forecast goes, considering the 10-year period would provide greater alignment with Enbridge's planning process and greater ability to assess future trends. Capital projects to provide gas supply are amortized and collected from ratepayers over a period of 40 years or longer. It is appropriate that the Gas Supply Plan include the longest forecast period available, which is currently 10 years.

⁴⁶ Exhibit I.2-PP-2.

⁴⁷ Exhibit I.2-PP-2, Attachment 1, Page 9.

⁴⁸ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, pages 149-150.

⁴⁹ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 150.

⁵⁰ EGI_5-Year Gas Supply Plan updated 20250904, page 5.

⁵¹ Exhibit I.2-PP-3b.

⁵² Exhibit I.2-PP-4.

⁵³ Exhibit I.2-PP-3a.

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?

Enbridge indicates that the Company’s planned approach to execution of the 5-Year Gas Supply Plan, including implementing changes resulting from Phases 2 and 3 of the Rebasing Proceeding, is appropriate⁵⁴. Enbridge has not actually included any updates to its 2025 gas supply plan based on Phases 2 and 3 of the 2024 Rebasing proceeding and Enbridge notes that the changes are expected to impact the gas supply plan, once included. The Phase 3 proceeding is ongoing as of the time of this submission and any OEB direction or decision is pending. The demand forecast Enbridge used for the purposes of the 2025 Five-Year Gas Supply Plan is based on the approach reviewed in Phase 1 of the 2024 Rebasing Application⁵⁵.

As noted, there are many other proceedings outcomes which relate to gas supply planning. It is recommended that the OEB require Enbridge as part of its 2026 gas supply plan filing to catalogue all the OEB directions from relevant proceedings and map what changes have been made to the gas supply plan and which remain outstanding.

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?

Enbridge notes that Appendix F to the pre-filed 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.

As noted above, changes related to the Phase 2 Rebasing Decision are outstanding. Phase 3 is still pending and expected to be complete prior to the 2026 gas supply plan. There are additional related requirements that will need to be added to the gas supply plan, such as demand scenario analysis. Pollution Probe has also noted various areas of the gas supply plan which do not appear to be aligned with the detailed requirements in the Framework (e.g. scorecards). The OEB will need to determine what direction to provide Enbridge to close those gaps. Enbridge should incorporate all these outstanding elements into the 2026 gas supply plan for OEB review.

⁵⁴ EGI_ARG_20251125, paragraph 41.

⁵⁵ Exhibit I.2-PP-3b.

Enbridge Gas's 2025 Annual Update

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

Enbridge did not include all the appropriate evidence and explanation to support its 2025 Annual Update to the previous 5-year gas supply plan. Gaps have been identified in other sections and included in the recommendations section above. As noted, in some cases Enbridge refused to provide information and analysis requested. This has been a limiting factor for annual gas supply plans. In order to achieve meaningful and measurable continuous improvement and value for ratepayers, the gas supply plan review process needs to be a comprehensive, open and transparent process, and not be seen as simply an administrative check box to check annually. As noted, the gas supply portfolio represents one of the largest ratepayer costs and is significantly impacted by the energy transition.

OEB Gas Supply Framework

7) Should the OEB review and/or amend the Framework and/or annual review process (including timing)?

The Framework is intended to ensure that there is transparency, accountability and measurability regarding the distributors' gas supply plans to assure they deliver value to consumers⁵⁶. Given that the current OEB Gas Supply Framework represents the first generation approach, it has done a good job over the first five years of annual gas supply plans, but improvements are needed and recommended. Some of the recommendations relate to proposed continuous improvement and some comments relate to misalignment between the gas supply plans and the Framework requirements. It is recommended that the OEB include direction in the Decision for this proceeding to close those gaps and implement relevant recommendations, starting with the 2026 gas supply plan. If the OEB determines that the Framework needs to be updated, OEB direction can be consolidated and included in the update at that time. It is recommended that the OEB plan a more detailed review and update of the Framework as part of a future generic proceeding, ideally following the review Enbridge's 2026 gas supply plan. An adjudicated review of the 2026 gas supply plan would help the OEB understand how the improvements included from this proceeding have been applied and what the appropriate timing should be for the formal Framework review.

Enbridge notes that it understands the basis to have an adjudicative process for this current 5-Year GSP, but Enbridge suggests that that using an adjudicated process be

⁵⁶ EB-2017-0129 Report of the Board_Gas Supply Plan Framework_20181025, page 1.

an exception. Enbridge also suggests that for future 5-year plans, the OEB should assess whether an adjudicative process is efficient and required⁵⁷.

It is important to note that the ability to leverage an adjudicated process is not new, and that the Gas Supply Framework included the ability for adjudication by the OEB to ensure that the gas supply plan is compliant and meeting the intended purpose annually. This is an important and core part of the annual process. For the first five annual gas supply plan reviews, a light touch approach was used and it is now appropriate to reflect on that period and the appropriateness of how OEB panel adjudication fits for the future. The annual OEB process for the gas supply plan is the only consultation and review that occurs for this important plan⁵⁸. There has been no stakeholder input or review in development of the gas supply plans, including engagement and consultation with First Nations or the stakeholders representing those served by Enbridge. Enbridge confirmed that the OEB process is the only opportunity for engagement and consultation⁵⁹. Without the OEB annual process, there would be no process for consultation or review of the gas supply plan. The importance of this annual OEB process should not be underestimated.

As noted previously, the OEB is aware that the gas supply portfolio represents one of the largest utility activities by total ratepayer impact, estimated at over \$5 billion of this plan term. This adjudicated process has already exhibited some benefits above the annual process used previously for the past five years. The level of information provided and responsiveness of Enbridge to questions has been greater than what has occurred previously. In previous annual plan reviews, Enbridge has refused to provide information requested and has even suggested that providing undertakings from the Technical Conference is not part of the OEB's intended process for the annual gas supply plan⁶⁰. It is recommended that the OEB include in the procedural orders for the annual gas supply plan proceeding a deadline following the stakeholder conference for Enbridge to file undertaking responses. This will help ensure that the annual process is normalised to what occurred in this proceeding and what is typical for similar proceedings.

Progress in alignment with Ontario's transitioning energy needs required modern and continuous improvement that has been missing in the annual gas supply plan updates. Although this proceeding provides a five-year checkpoint to assess progress and start the changes needed, it would be more responsive to policy and customer needs if the process ensure that improvements occurred on a continuous annual basis. Pollution

⁵⁷ EGI_ARG_20251125, paragraph 60.

⁵⁸ Exhibit I.6-PP-8 and OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 144, line 28.

⁵⁹ Exhibit I.1-GFN-1c.

⁶⁰ EB-2024-0067 2024-07-02 Transcript EB-2024-0067 Stakeholder Conference, page 6, lines 10-12.

Probe recommends that the OEB consider adding a procedural step early in the annual gas supply plan procedural process to solicit input on the level of appropriate adjudication required based on the details and gaps of each annual gas supply plan filed. Given the volume of updates required for the 2026 gas supply plan, it is recommended that the OEB plan for this review to be conducted in an adjudicated manner.

Enbridge has been using a rolling five-year GSP approach for its annual five-year gas supply plan⁶¹. This is appropriate and represents best practice since it enables a five year future view for each plan generation, rather than the plan becoming stale each successive year before it is renewed. As noted, above, it is recommended that each annual gas supply plan include the full 10-year forecast, rather than truncating the information in half for the gas supply plan.

Enbridge Gas owns and contracts for storage capacity to further improve the diversity of its gas supply portfolio⁶². As noted, Enbridge does not have a gas supply strategy document⁶³ which would have provided clarity to the OEB and stakeholders on the direction the portfolio needs to take for the future and how it integrates with other functions. This also mean that the gas supply plan does not currently provide the holistic understanding of the gas supply portfolio. Regulated and unregulated gas supply planning and execution occurs within Enbridge's gas supply function, but the more holistic view is lost when information is siloed for creation of the annual gas supply plan. Requiring Enbridge to file a comprehensive gas supply strategy document would provide a better understanding on how the consolidated elements can function to enhance ratepayer value over time.

Enbridge outlines that this 5-Year gas supply plan is prepared and filed to align with the OEB's Framework requirements. Pollution Probe observes that the way the Framework has been applied by Enbridge appears more narrow than intended. It is recommended that the OEB indicate that the Framework is a minimum set of requirements and that a broader gas supply portfolio assessment is recommended to ensure that ratepayer and policy value is enhanced over time. This includes, but is not limited to leveraging the gas supply function to achieve cost-effective ratepayer and policy outcomes as part of the broader integrated utility portfolio. A more comprehensive view of the role and contribution of the gas supply function in coordination with other Enbridge functions (e.g. IRP and asset planning) would help achieve better outcomes.

⁶¹ Exhibit I.6-PP-7.

⁶² EGI_ARG_20251125, paragraph 32.

⁶³ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 164.

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?

Yes, the gas supply plan should consider and include supply-side IRP options where those could be impacted by gas transportation arrangements and/or gas contracting.

As the OEB is aware, gas supply and related supply side options has been an ongoing focus since establishment of the IRP Framework. In fact, the only IRP project which Enbridge has brought forward for OEB consideration was predicated on a gas supply solution, per the East Kingston Project⁶⁴. The supply side IRP project was implemented, but ended up not being required due to customer confirmation of their actual demand requirements⁶⁵. In fact all supply side IRP options relate to the gas supply portfolio which includes gas transportation arrangements and/or gas contracting. Unfortunately, there has been limited consideration of supply side IRP alternatives which has been one of the limiting factors resulting in little to no IRP results being achieved.

Enbridge has requested that the OEB deliver a finding in this proceeding 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)⁶⁶. Although it should be clear that gas supply needs to be an integrated part of IRP options, this element has been materially absent from annual gas plans. Integrated energy planning is a policy objective supported by the Province and OEB⁶⁷. Under the current Framework, Enbridge should be proactively identifying gas supply tools and options that can be applied to meet demand needs that feed into the Asset Management Plan process. Currently that link appears to be broken and needs to be fixed.

It is recommended that the OEB reaffirm the importance of IRP considerations as part of the gas supply function. It is also recommended that the OEB require Enbridge to develop and include a comprehensive catalogue of detailed supply side IRP tools which can be considered for use as an alternative to incremental supply procurement. This should include, but not be limited to consideration of supply side alternatives and peak demand reduction leveraging interruptible rate options.

Finally, Enbridge included a new process diagram it created in the later half of August 2025⁶⁸ in response to questions on the connections between gas supply and IRP in this

⁶⁴ EB-2024-0125 EGI_APPL_updated 20240702, pages 19-20.

⁶⁵ EB-2024-0125 Exhibit I.STAFF-3

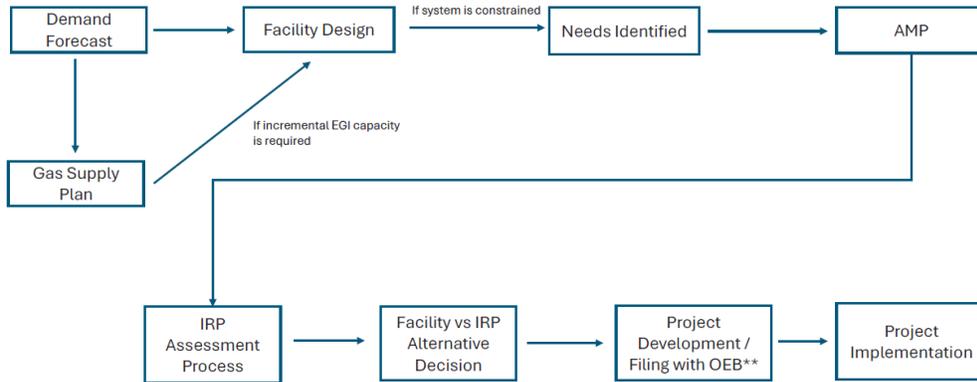
⁶⁶ EGI_ARG_20251125, paragraph 13.

⁶⁷ Exhibit I.6-PP-16.

⁶⁸ OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, page 145, line 19.

proceeding. The new process Enbridge has moved to is represented by the following diagram⁶⁹.

Diagram 1
Linkage between Gas Supply Planning and Integrated Resource Planning*



The new diagram represents a different process than that considered and used since the OEB IRP Decision and Framework was established (see below).

EB-2020-0091 Exhibit I.Staff.2



Both the original and the new diagrams start with the first block being the gas supply function, but adjustment not specific to the gas supply plan are made later in the process diagram. Enbridge has not requested that the OEB consider the specific impacts of this change or approve Enbridge’s new process approach. The new diagram may be in conflict with the IRP Framework and recent OEB direction to ensure that IRP assessment is completed in advance of the Asset Management Plan completion⁷⁰. Although this issue impacts gas supply, this proceeding does not seem to be the best place for the OEB to consider the proposed process change impacts on IRP. It is

⁶⁹ Exhibit I.6-PP-15

⁷⁰ EB-2022-0200.

recommended that the OEB note that those impacts will need to be reviewed in a future proceeding, perhaps the IRP Framework review⁷¹.

⁷¹ EB-2025-0125.