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December 18, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

**RE: EB-2025-0065 Enbridge Gas Inc. - Review of Five-year Gas Supply Plan
Argument Submissions of Energy Probe**

Attached are the argument submissions of Energy Probe Research Foundation (Energy Probe) in the EB-2025-0065 Enbridge Gas Inc. Application to Review Five-year Gas Supply Plan. Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)
Regulatory Proceedings (Enbridge Gas Inc.)
Intervenors of Record

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EGI 5-year Gas Supply Plan

EB-2025-0065

Energy Probe Argument Submissions

Regulatory Background

Enbridge Gas Inc. filed a 5-year gas supply plan with the Ontario Energy Board on May 1, 2025. The five-year gas supply plan covers the period of November 1, 2025, to October 31, 2030. The application also included Enbridge Gas's annual gas supply plan update for the 2024/2025 gas year. In PO No.1 of June 17, 2025, the OEB set procedural steps for the Proceeding. Issues Conference was on July 22; the Interrogatory process started with interrogatory questions on August 14 and ended with responses on by September 4. The Technical Conference was on September 16 and 17. In PO No.2 of November 5, the OEB decided to proceed to written hearing. Enbridge Gas filed its Argument-in-Chief on November 25, and intervenors were to file their argument submissions by December 12. The following are the submissions of Energy Probe.

Energy Probe Submissions

The submissions of Energy Probe follow the Issues List for this proceeding.

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?

Energy Probe Submission

The following are the three OEB gas supply planning principles.¹

“1) Cost-effectiveness – The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.

2) Reliability and security of supply – The gas supply plans will ensure the reliable and secure supply of 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.

3) Public policy – The gas supply plan will be developed to ensure that it supports and is aligned with public policy where appropriate.”

Energy Probe submits that the 5-year gas supply plan appropriately reflects and balances the three OEB gas supply guiding principles in a way that is prudent and delivers value to customers.²

¹ EB-2017-0129 Framework for the Assessment of Distributor Gas Supply Plans, Report of the Board, October 25, 2018, pages 6 and 7

² Exhibit I.1 FRPO-1: Exhibit I.1-FRPO-7

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**

Energy Probe Submission

Yes. Energy Probe submits that the 5-year gas supply plan appropriately addresses the six gas supply plan criteria set out in the OEB’s Framework for the Assessment of Gas Distributor Gas Supply Plans: demand forecast analysis, supply option analysis, risk mitigation analysis, achieving public policy objectives, procurement process and policy analysis, and performance measurement.³

Some parties may argue that indigenous reconciliation is one of the public policy objectives that should be addressed by the gas supply plan⁴. Energy Probe submits that indigenous reconciliation is a social policy objective that is outside the scope of the gas supply planning process. It should be achieved through a political process and not the OEB energy regulatory process.

The Minister of Energy and Electrification (now Minister of Energy, Northern Development and Mines) issued his renewed Letter of Direction to the OEB on December 19, 2024, which included a number of expectations and directives. The OEB, as of the time of filing had 32 active policy initiatives and consultations. Many of these will require electricity distributors to make large expenditures with no offsetting increases in revenues, such as investments in system hardening, and in facilitating connections of customers with residential rooftop solar generators and home batteries. Similar initiatives have resulted in large electricity cost increases in other jurisdictions.

“According to the Electricity Distributors Association, between \$103 and \$120 billion in cumulative capital additions will be needed in the distribution system to support moderate to high electrification scenarios, including significant capital investments in substations, transformers, and digital grid management tools.”⁵

Energy Probe believes that due to the above large expenditures, home heating with electricity will become even more costly in comparison with natural gas over the forecast period, and that the decline that Enbridge Gas expects will not happen.

³ Exhibit I.5-EP-2

⁴ Exhibit I.1-GFN-1; Exhibit I.1-GFN-2; Exhibit I.1-GFN-3

⁵ Ministry of Energy and Mines, [Energy for Generations](#), (published June 12, 2025; updated October 10, 2025), page 93

Energy Probe submits that Enbridge Gas should be able to manage its gas supply if the decline does not happen.⁶

Energy Probe is concerned that Enbridge Gas may be relying too much on peaking services, and the increasing costs of such services due to the lack of availability of TCPL pipeline capacity. However, Energy Probe is confident that Enbridge Gas will be able to deal with this problem.⁷

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

Energy Probe Submission

Yes. Energy Probe submits that the 5-year gas supply plan provides appropriate gas supply plan outlook information.

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?

Energy Probe Submission

Yes. Energy Probe submits that Enbridge Gas’s planned approach to execution of the 5-year gas supply plan is appropriate, including implementing changes resulting from Phases 2 and 3 of the 2024 Rebasing Proceeding in future Annual Updates.

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?

Energy Probe Submission

Yes. Energy Probe submits that Enbridge Gas responded appropriately to previous commitments, OEB staff reports and OEB decisions as they relate to the 5-year gas supply plan.

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?

Energy Probe Submission

Yes, Energy Probe submits that Enbridge Gas has filed appropriate evidence and explanation to support its 2025 Annual Update to the previous 5-year gas supply plan.

⁶ Exhibit I.4-EP-1 b

⁷ Exhibit I.5-EP-2; Exhibit I.2-STAFF-5.

OEB Gas Supply Framework

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

Energy Probe Submission

No. Energy Probe submits that there is no need to review and amend the Framework and/or annual review process or timing. Energy Probe believes that the current Framework has worked well so far.

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?

Energy Probe Submission

No. Energy Probe submits that the gas supply plan should not consider and include supply-side IRP options where those could be impacted by gas transportation arrangements and/or gas contracting. As Enbridge Gas pointed out gas supply planning and IRP occur at different times and on separate schedules.⁸ Energy Probe submits that including IRP in gas supply planning or gas supply planning in IRP would result in duplication of effort.⁹

⁸ AIC page 15

⁹ Exhibit I.2-Staff-12: Exhibit I.6-PP-15