

December 18, 2025

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VIA RESS

Mr. Ritchie Murray
Acting Registrar
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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Dear Mr. Murray:

Re: EB-2025-0065: Enbridge Gas Inc. (EGI) 5 Year Gas Supply Plan
IGUA Submissions

On behalf of IGUA we have reviewed EGI's 2025-2030 Gas Supply Plan filing. Other parties will have reviewed, and will comment on, EGIs plan in detail, and IGUA largely defers to those parties. We do wish to offer brief comment in three areas.

First, the pre-filed material is clear, comprehensive and well organized. This has facilitated our review and consideration of EGI's gas supply, transportation and storage planning principles, approach and results. We commend EGI for the quality and transparency of its Gas Supply Plan filing.

Second, as IGUA has in the past, we note, and endorse, EGI's approach to considering and describing the impacts of gas supply planning on its own transmission system.¹

For example, EGI notes that customer deliveries obligated to Parkway are considered for design day planning purposes, and reduce the need for expansion of facilities to meet design day requirements. IGUA members are among those with Parkway obligated deliveries.

EGI further describes contracting for temporary assignment of transmission capacity from Niagara to the Enbridge CDA on TCPL for four months of the winter, further offsetting the need for additional facilities on the Dawn Parkway system.

EGI also discusses reliance on natural gas supplies flowing past the Sarnia Industrial Line (SIL) system on the way to Dawn, and the ability of EGI to rely on these flows to address design day requirements for Sarnia area customers and thus defer the need for reinforcement from the Dawn Hub to the SIL system. Some IGUA members, who are among the largest gas consumers in the

¹ See Gas Supply Plan, pages 67-68.

province, are served by the SIL. We further note EGI's renewal of St. Clair River Crossing capacity, which provides a path for Appalachian supply via the NEXUS pipeline and thus can provide for design day supply to the SIL as noted above.²

These are all good examples of inclusion in EGI's gas supply planning of consideration, and contracting for, "supply side alternatives" that have, and continue to, offset facilities requirements. IGUA endorses these gas supply plan considerations.

Third, we observe in particular EGI's discussion on the topic of "achieving public policy".³ EGI's plan describes the impact of policy developments on its forecasts and supply costs, and provides updates on "policy related" initiatives approved by the OEB in other proceedings such as procurement of renewable natural gas (RNG) and hydrogen blending. As details regarding these initiatives are reviewed in other proceedings (for example, EGI's RNG program modification was the subject of Phase 2 of EGI's 2024 rate rebasing and harmonization application; EB-2024-0111), EGI's Gas Supply Plan presentation of its consideration, and treatment, of public policy matters is appropriate.

Finally, we have one comment on EGI's Argument in Chief (AIC). At paragraphs 60 and 61 of the AIC EGI asserts a default assumption that gas supply plans, and annual updates, should not be subject to what EGI refers to as an "expanded adjudicative process being employed in this case".

Reference to the *Framework for the Assessment of Distributor Gas Supply Plans (Framework)*⁴ indicates a process for review of both gas supply plans and updates⁵ thereto which:

1. Provides stakeholders with an opportunity to submit written questions.
2. Includes a transcribed "stakeholder conference" providing EGI with an opportunity to address questions from stakeholders (about the manner in which the guiding planning principles are achieved).
3. Provides EGI with an opportunity to provide written comments or revise their plans based on feedback from stakeholders.
4. Following the foregoing, the preparation of an OEB Staff report assessing the gas supply plan.
5. Consideration of that report by the OEB and determination whether a proceeding to consider all or portions of the plan is required.

The current proceeding effectively included items 1 and 2, and will include items 3 and 5, from the list above, but displaces item 4. In some ways, then, the current proceeding is in fact simpler than the process set out in the *Framework*. It is not clear what further simplification EGI is suggesting.

² Gas Supply Plan, pages 43-44.

³ Gas Supply Plan section 6, pages 63-72.

⁴ *Framework*, pages 14-15.

⁵ The *Framework* indicates that assessment of updates will be carried out in a manner similar to the five-year gas supply plan. See page 14, last full paragraph.

The *Framework* addresses the importance of the gas supply plan review process as follows⁶ (our emphasis):

The Framework outlines a robust process for review of distributors' gas supply plans, in particular to achieve the transparency that has been endorsed by the OEB. Given the importance of gas supply-related costs to natural gas customers, the process must ensure adequate participation and engagement. Gas supply plans play an important role in a number of different OEB processes, discussed further below. Therefore, it is important to consider how the process for the review of the plans can contribute to these other proceedings to deliver greater value to customers.

The *Framework* goes on to call for a “robust review”, noting that “[t]his review will provide the main OEB assessment of the cost consequences using the criteria set out in the *Framework*”.⁷

While the particulars and focus of the gas supply plan review process may vary depending on the nature of the plan, or plan update, filed, in any event the *Framework* recognizes the importance and broad customer cost impact of gas supply planning, and contemplates a “robust review” which includes written questions and answers, a transcribed conference for further clarification, and written submissions from interested and impacted parties. The current process meets these expectations, and is completely appropriate.

Yours truly,



Ian A. Mondrow

- c. Nazim Sebaa, IGUA
Richard Wathy, EGI
David Stevens, Counsel to EGI
Intervenors of Record

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⁶ *Framework*, page 13, first paragraph.

⁷ *Framework*, page 13, second full paragraph.