

BY EMAIL and RESS

December 18, 2025

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

Dear Mr. Murray:

EB-2025-0065: Enbridge Gas Inc. 5-Year Gas Supply Plan - Building Owners and Managers Association Toronto (BOMA Toronto) Submissions

Introduction

Enbridge Gas Inc. (EGI) filed a five-year gas supply plan with the Ontario Energy Board (OEB) on May 1, 2025. The five-year gas supply plan (5-Year GSP) covers the period of November 1, 2025 to October 31, 2030. The application also includes EGI's 2025 annual update for its gas supply plan.

In its November 15, 2025 Argument in Chief, EGI stated that this 5-Year GSP sets out how EGI will meet gas supply requirements over the next five years in a way that is prudent and delivers value to customers. It also stated that this 5-Year GSP sets out how EGI balances the OEB Framework gas supply planning principles of cost-effectiveness, reliability and security of supply in a measured and considered fashion (taking into account the need for flexibility and diversity of supply), such that future changes in demand or supply can be managed appropriately.

In general, BOMA Toronto has no substantial concerns with EGI's 5-Year GSP. We are providing additional comments on a number of specific issues.

BOMA Toronto Submissions

1. Gas Supply Plan Outlook – Demand Forecast

In general, BOMA Toronto believes EGI's demand forecast is reasonable. The annual demand forecast was developed using the same methodologies as those utilized to establish EGI's OEB-approved annual demand forecast for the 2024 Rebasing proceeding. BOMA submits that assumptions used to derive the impact of demand side management and energy transition activities in EGI's demand forecast are reasonable and appropriate. EGI's assumptions and methodology to determine design day demand are also reasonable and appropriate.

2. Linkage between Integrated Resource Planning (IRP) and Gas Supply Planning

As part of its interrogatory responses, EGI provided an updated diagram¹, showing the linkage between gas supply planning and Integrated Resource Planning. Based on this diagram and the evidence filed in this proceeding so far, it is still unclear to BOMA Toronto whether EGI's gas supply plan is sufficiently and directly linked to supply-side IRP options. As such, BOMA Toronto submits that this linkage should be thoroughly reviewed and examined in EB-202-0125 - Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas.

3. Should the OEB review and/or amend the Framework and/or annual review process?

BOMA Toronto submits that it is not necessary to review and/or amend the Framework and/or annual review process. The current process is appropriate and effective.

Respectfully submitted on behalf of BOMA Toronto,



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¹ Exhibit 1.6-PP-15 Attachment 1, Diagram 1