

Scott Pollock
T: 613-787-3541
spollock@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen Street, Suite 1300
Ottawa ON K1P 1J9
Canada
T 613-237-5160
F 613-230-8842 / F 613-787-3558 (IP)
blg.com



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

Dear Mr. Murray,

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

On or about May 1, 2025, EGI submitted its 5-Year Gas Supply Plan (the “GSP”) covering the period from November 1, 2025, to October 31, 2030,¹ pursuant to the Framework for the Assessment of Distributor Gas Supply Plans (EB-2017-0129).

In Procedural Order No. 1, the Board determined that there would be an issues conference, interrogatories, and a technical conference, which took place between September 16 and 17, 2025. The Board’s approved issues list provided eight issues were within scope of this proceeding. What follows is CME’s submissions on some, but not all of the issues on the issues list. Where these submissions do not touch on an issue, CME takes no position with respect to that issue.

In general, CME submits that EGI’s GSP appropriately reflects and balances the three gas supply principles set out by the OEB, namely cost effectiveness, reliability and security of supply, and public policy. However, CME has additional comments with respect to certain components of EGI’s GSP, which are as follows:

- 1) CME has had the benefit of reviewing the Federation of Rental Housing Providers’ (“FRPO”) final argument in this proceeding. CME agrees with FRPO that the use of fixed-price winter gas deliveries at Dawn for load balancing could be an economical tool for EGI to use in its gas supply portfolio, and has the added benefit of reducing price risks, thereby furthering the Board’s cost effectiveness and reliability/security of supply principles. In EB-2024-0111, the Board approved a settlement agreement that expressly provided that EGI would “consider” the

¹ EB-2025-0065, EGI Application and Evidence, p. 1.

use of forward contracts for winter gas purchases.² CME submits that the Board should require EGI to begin to contract for fixed-price winter deliveries at Dawn. EGI's witness panel expressed reservations about the use of fixed price winter gas deliveries, given the potential for cost disallowance.³ However, CME submits that with proper regulatory guidance, such contracting could be completed by EGI without an undue amount of additional cost recovery risk. Accordingly, CME submits that the Board should direct EGI to transact for a modest amount of fixed-price winter deliveries to Dawn to demonstrate the strategy's potential. All parties could then consider the impacts and potential of use fixed price winter deliveries as a tool going forward in EGI's gas supply planning.

- 2) In an interrogatory response to CME, EGI stated that none of EGI's gas supply plan, planning practices, and related decisions were "influenced by threats or the imposition of U.S. tariffs or reciprocal Canadian tariffs."⁴ EGI also stated that it would essentially adopt a wait and see approach to tariffs, relying on cost recovery from ratepayers through the Purchased Gas Variance Account for any tariff costs.⁵ Tariffs have a significant impact on CME's members' businesses. Tariffs on CME's members' products or inputs could likely be applied at the same time or very close together with tariffs or reciprocal tariffs on energy, thereby significantly increasing the cost of energy on its members as well. As a result, CME submits that EGI should not simply take a wait and see approach and rely on cost recovery from its ratepayers before evaluating potential tariff impacts on gas supply options. CME submits that EGI should take a pro-active approach to monitoring potential tariffs and reciprocal tariffs when evaluating gas supply options. To be clear, CME is not suggesting that EGI should only choose those supply options with the lowest sensitivity to tariff impacts. However, CME submits that EGI should proactively evaluate the likelihood and consequence of tariffs when reviewing gas supply options and choose cost-effective and secure alternatives which incorporate EGI's evaluation of tariff related risks, in addition to all other risks they currently evaluate.

Yours very truly



Scott Pollock

cc. Pratik Bhalerao

² EB-2024-0111, Decision on Settlement Proposal and Interim Rate Order, November 29, 2024, Exhibit N, Tab 1, Schedule 1, p. 23 of 44.

³ EB-2025-0065, Transcript Volume 2, p. 9.

⁴ EB-2025-0065, Exhibit I.1 CME-4

⁵ EB-2025-0065, Application and Evidence, p. 64.