Joel Denomy
Technical Manager
Strategic Applications – Rate Rebasing
Regulatory Affairs

tel 416-495-5499
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, ON
M1K 5E3
Canada

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VIA RESS AND EMAIL

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

Dear Ritchie Murray:

Re: EB-2025-0227 Enbridge Gas Inc. (Enbridge Gas) Comments on Ontario Energy Board (OEB) Staff Discussion Paper: Gas-Electric Co-ordination Information Sharing

Enclosed please find the comments of Enbridge Gas on OEB Staff's discussion paper related to the co-ordination of information sharing between natural gas and electric utilities.

If you have any questions, please contact the undersigned.

Sincerely,

Joel Denomy

Joel Denomy
Technical Manager, Strategic Applications – Rate Rebasing

ENBRIDGE GAS INC. RESPONSE TO OEB STAFF DISCUSSION PAPER "GAS-ELECTRIC CO-ORDINATION INFORMATION SHARING" (EB-2025-0227)

Enbridge Gas (Enbridge Gas or the Company) appreciates the opportunity to provide feedback on the Ontario Energy Board (OEB) Staff Discussion Paper, *Gas-Electric Co-ordination Information Sharing* (EB-2025-0227) (Discussion Paper). The Discussion Paper outlines OEB staff's perspectives on section 1 of the Minister of Energy and Mines' (Minister) directive (Directive) to the OEB regarding implementation of the government's Integrated Energy Plan (IEP).

Enbridge Gas supports the Minister's and OEB's policy direction to strengthen gas-electric information sharing and co-ordination.

The Discussion Paper frames the outcome of co-ordination as 'rightsizing'[1] the energy system. Enbridge Gas takes exception to the notion of natural gas-electric co-ordination resulting in 'rightsizing' across sectors, as 'rightsizing' can be interpreted as limiting expansion in one sector for the benefit of another. Rather, consistent with the IEP and the Directive, *Enbridge Gas believes that the intended outcome of this work is to ensure the timely, cost-effective build-out of infrastructure by each sector – gas and electric – at a pace that enables growth, preserves affordability, supports reliability and resiliency, and upholds consumer choice*.

Enbridge Gas does not believe that a central repository for data is needed and suggests a simpler approach should be taken. The near-term objectives should be to identify what data and information is the most valuable to share, and where sharing is already happening. Rather than creating new processes, existing processes can be formalized and enhanced to increase transparency. This should include developing common definitions for data and information to be shared and templates that can facilitate comparability and consistency of sharing. Enbridge Gas believes that direct bilateral/multilateral information sharing in high-growth areas[2] is where gas-electric co-ordination has the highest value. The Company has already begun coordinating with electric distributors (LDCs) in several areas of high growth. This approach prioritizes resources and allows for more efficient and effective comparability of information where it is most valuable.

Should the OEB decide to proceed with a central repository, Enbridge Gas recommends that service-territory and provincial-level aggregated data and information is the most appropriate approach for gas data. Because gas and electricity planning geographies do not align, requiring gas data at electricity regional planning boundaries would impose administrative burden and risk misinterpretation without commensurate benefit. Enbridge Gas recommends a fixed annual submission deadline that begins at least six months after framework finalization, with annual updates thereafter where data materially changes.

Finally, Enbridge Gas emphasizes that the activities required to fulfil the Directive requirements as proposed by the OEB in the Discussion Paper are significant and resource intensive. For Enbridge Gas to engage in information sharing and co-ordination at its service-territory-level, potentially involving participation in the Independent Electricity System Operator (IESO)'s 21

[1] EB-2025-0227, Staff Discussion Paper: Gas-Electric Co-ordination Information Sharing, December 17, 2025, p. 16 and 19.

[2] High-growth areas are areas that are expecting or have potential for more significant increases in housing development and/or major commercial, industrial, institutional and other load growth.

regional planning meetings and direct engagement with LDCs in high-growth areas requires substantial time and effort. These challenges are compounded by the misalignment between gas and electric planning regions and the presence of more than 60 LDCs across Ontario. Enbridge Gas has proposed a less resource intensive method of information sharing, which will require less resources than would be required to support the OEB's proposal; however, may still require incremental resources. Enbridge Gas highlights that the IESO has resources to support this work; therefore, Enbridge Gas must also be afforded the same flexibility to fund dedicated resources for gas-electric information sharing and co-ordination. Absent this capability, Enbridge Gas expects that both the effectiveness of its efforts and the achievement of the intended outcomes would be negatively impacted.

This submission provides a structured set of clarifications, alternatives, and recommendations to support the OEB in designing a framework that avoids regulatory inefficiency, unnecessary administrative burden, and any compromise to achieving the desired outcomes. Enbridge Gas has focused its feedback on the OEB's near-term objectives of information sharing. The Company would be happy to provide additional specific suggestions on the scope and content of the framework throughout the OEB's consultation process. The Company intends to provide additional input on any medium-term objectives related to aligning assumptions and scenarios once further direction is received from the Minister or OEB.

Responses to OEB Staff Discussion Questions

OEB Staff Question #1 – Current State

What are your views on the successes and limitations of existing gas-electric information sharing and co-ordination?

Enbridge Gas has participated in regional electricity planning, contributed natural gas perspectives to province-wide advisory groups, and has proactively engaged with LDCs in areas of high growth. Although a formal framework has not yet been established, there has been meaningful discussion and collaboration between the gas and electricity sectors. Enbridge Gas provides specific successes and limitations from its experiences below.

Successes

Enbridge Gas has proactively engaged directly with select LDCs and the IESO in high-growth areas to share information and improve mutual understanding of planning processes and key planning inputs (e.g., growth forecasts). This work is intended to enhance the comparability and clarity of key planning inputs and support more effective co-ordination going forward.

Enbridge Gas has also participated in broader cross-sector regional planning engagements, including:

- The 2025 London Integrated Regional Resource Plan (IRRP) technical working group (TWG) - highlighted the value of information sharing and discussion, particularly among electric LDCs in developing a regional electricity demand forecast.
- The 2023-2024 Ottawa IRRP TWG scenario sub-group meetings - supported early information exchange, and consideration of gas system perspective in scenario modelling, improving cross sector dialogue.

- The 2021 Regional Planning Process Advisory Group - supported early cross-sector dialogue and helped elevate natural gas considerations within provincial discussions on regional planning.
- The 2019 Windsor-Essex IRRP meetings - shared and reviewed information, and provided feedback, allowing for the consideration of the gas system perspective.

The insights from these engagements have informed Enbridge Gas's view of how co-ordination can drive the most value and has shaped the responses provided below on current limitations.

Current Limitations

There are limitations that the OEB's framework could help address. These include facilitating:

- Better understanding of each other's planning processes. To aid in resolving this limitation, Enbridge Gas would be willing to provide an overview of gas system planning at an upcoming Gas-Electric Co-ordination Forum meeting.
- Development of a defined list of information that is valuable to be shared.
- Determination of common definitions for key planning inputs (e.g., customer classes, weather metrics such as heating degree day (HDD)/cooling degree day (CDD) and design conditions). The lack of aligned definition could inhibit comparability and increase the risk of misinterpretation when information is shared.
- Creation of information sharing templates for utility use when working directly with each other. Enbridge Gas has already begun to work with some LDCs to develop templates that could be used to support the OEB's work.

In addition, the large number of LDCs in Ontario could create resourcing challenges associated with information sharing and co-ordination for Enbridge Gas, depending on how the framework is structured.

OEB Staff Question #2 – Outcomes and Objectives

What feedback do you have on the OEB's proposed outcomes and objectives for gas-electric information sharing and co-ordination?

Enbridge Gas does not agree that the outcome of information sharing should be framed as 'rightsizing' the buildout of energy systems, as 'rightsizing' can be interpreted as limiting expansion in one sector for the benefit of another. The IEP states "Avoiding risks of higher costs due to overbuilding or underbuilding of energy infrastructure"[3] is an objective; however, neither the IEP nor the Directive to the OEB from the Minister mention 'rightsizing' energy systems between sectors as an outcome or objective of integrated energy planning. Enbridge Gas agrees with the Minister that over and underbuilding risks should be considered in both gas and electricity planning; however, the Company does not equate minimization of that risk to 'rightsizing' across sectors.

In Enbridge Gas's view, the intended outcome of the Minister's short-term and medium-term information sharing and co-ordination directives is the timely, cost-effective build-out of infrastructure by each sector – gas and electric – at a pace that enables growth, preserves

[3] Government of Ontario. (June 2025). Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7. p. 120.

affordability, supports reliability and resiliency, and upholds consumer choice. This aligns with the IEPs objectives of planning for growth while avoiding the risk of under or overbuilding, as well as reducing the risk of energy shortages and associated lost economic opportunities.[4]

Enbridge Gas disagrees with the OEB's objective of data comparability – which states that greater planning data comparability would allow for identification of distribution level synergies, constraints and redundancies between the gas and electricity sectors. Enbridge Gas believes that this objective should be reframed to align with the broader proposed outcome of information sharing, as outlined above.

Enbridge Gas provides comments on the objectives of the OEB's medium-term goals in the response to Question #10.

OEB Staff Question #3 – Information Sharing

How should planning information be shared, stored and accessed?

Enbridge Gas believes that the best approach for increasing co-ordination of energy planning in Ontario is to enhance existing processes, where necessary, rather than creating new processes.

From a provincial standpoint Enbridge Gas and the IESO are discussing scenarios and assumptions. Formalization of this existing dialogue at the provincial level could be helpful to ground more granular planning in a common provincial policy context.

In high-growth areas, Enbridge Gas is already and plans to continue working directly with relevant and willing LDCs and the IESO, to share and discuss planning information, and is open to doing so using OEB-approved approaches (i.e., templates), which could be formalized through the gas-electric information sharing forum. This prioritizes resources and allows for more efficient and effective comparability of information where it is most valuable. It is Enbridge Gas's view that each party be required to sign a non-disclosure agreement or undertaking (NDA) prior to receiving shared planning information to mitigate commercial, operational and security risks, including the potential misinterpretation or misuse of preliminary planning assumptions.

Enbridge Gas does not believe that a central repository is needed. However, if a central repository was established, Enbridge Gas proposes that centrally stored data and information should be:

- Provided at a service territory or provincial level.
- Only be provided by utilities and the IESO, because encouraging municipalities, urban and transportation planners and Indigenous communities to provide data into a database could lead to unnecessary complexity, confusion and/or misinterpretation. This data could be shared in other ways.
- Accessible only to utilities, the IESO and the OEB because these entities would be using it for planning purposes and have the context and skillsets to appropriately use the

[4] Government of Ontario. (June 2025). Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7, p. 120.

information. The planning information that is shared should not be publicly accessible to mitigate commercial, operational and security risks.

Please see the response to question 9 for Enbridge Gas's comments on the timing of entries.

OEB Staff Question #4 – Information Type

What gas and electricity planning information should be shared?

General Comments

Enbridge Gas is open to sharing the type of information the OEB has identified but notes further discussion is required to confirm the relevancy and value for the data points chosen. Enbridge Gas emphasizes that common definitions for each agreed-upon data element are required to ensure consistent understanding, application and interpretation.

Sharing electricity information/data at the IESO's regional planning level could assist electricity system planning by supporting the OEB's assessment of application reasonableness (i.e., demand, electric vehicles, and customer forecasts) and by promoting alignment of assumptions used in regional electricity planning.

Enbridge Gas notes, however, that providing gas information at the IESO regional planning level will not be valuable as gas and electricity planning areas are not aligned. In addition, many of the proposed items (e.g., demand, customer load forecasts, electric vehicles, CDM/DSM) would be limited in their usefulness for comparing gas and electricity applications. Instead, information sharing should focus on data and information that can provide the greatest value to natural gas and electric utilities, such as assumptions and data used to develop customer load forecasts.

Further feedback on data type, geography and granularity, time period, and time frame (horizon) is provided below. Enbridge Gas suggests that further discussion on each of the elements below is required and should occur at an upcoming forum meeting.

1. Types of Proposed Data

From Enbridge Gas's perspective, in the short term, the primary objective of information sharing should be the exchange of factual planning inputs such as annual housing counts and their anticipated locations. Sharing projections for residential, commercial, & industrial buildings, together with a common understanding of where and when growth will occur supports both gas and electricity system planning.

Enbridge Gas suggests that common definitions for the data and assumptions are necessary to ensure accurate understanding and comparability between utilities, as well as clarity in communications with municipalities, Indigenous communities, and other stakeholders. Absent common definitions, there is a risk of confusion regarding shared information and its implications for customer and demand forecasts. Examples where common definitions would be particularly helpful include:

- Customer types, whether defined by broad sector (i.e., residential, commercial, industrial), or by more granular sub-sectors (i.e., greenhouse, mining, data centres)
- Weather data (i.e., definitions of HDD and CDD), noting that design-condition weather is most relevant for system planning. While extreme weather events and climate trends

may inform gas supply planning and system resiliency, they are less directly relevant to peak capacity design.

2. Geography & Granularity of Proposed Data

Enbridge Gas disagrees with the proposal to provide gas system information aggregated by regional electricity planning area because gas and electricity planning regions do not align. Enbridge Gas is concerned that such misalignment would lead to data being misinterpreted and would divert resources toward activities that are not valuable.

Requiring Enbridge Gas to provide data in the construct of regional electricity planning geography would create significant administrative burden to translate the Company's service territory-level forecasts to regional electricity planning areas and vice versa. The level of work that would be required to fulfil this would not be valuable for gas system planning, for gas-electricity co-ordination, for the OEB in reviewing natural gas applications, and would not deliver the intended benefits, such as improved data comparability.

Should the OEB move forward with a central repository, Enbridge Gas could provide service territory-level and provincial-level information. This would include information/data that has already been provided within the Company's OEB applications as this would be the most current information. Examples include economic growth indicators, population forecasts, annual volumes, customer attachment projections, and annual peak hour or peak day demand. Making this information available for IESO regional electricity planning would help ground planning in a consistent provincial context—sharing trends, data, and policy assumptions—while avoiding the use of misaligned geographies.

Consistent with its *Gas Distribution Access Rule* (GDAR) obligations, Enbridge Gas will not provide customer specific information, or any information that could reasonably be used to identify a customer, or prospective customer – as part of any information sharing that occurs.

Enbridge Gas proposes that the granularity of the information provided should align with the purpose of the information provided (e.g., forecasted peak demands inform infrastructure planning).

3. Time Period of Proposed Data

Enbridge Gas proposes that sharing service territory information with an annual time period could be reasonable, (i.e., number of customers or forecasted demand per year). The units should align to the forecast (i.e., m^3/year or TJ/year for annual gas volumes, or m^3/hr by year or TJ/day by year for peak hour or peak day demands). Information shared directly with LDCs in high-growth areas would also use an annual time period.

4. Time Frame of Proposed Data

Regarding historical information, Enbridge Gas suggests that the information the OEB has collected annually from utilities for the natural gas distributor and electricity distributor yearbooks be used to avoid unnecessary duplication.

Regarding forecasted information, Enbridge Gas proposes a forecast horizon (time frame) aligned to what a utility uses in their respective Cost of Service applications to the OEB.

OEB Staff Question #5 – Data Comparability

How should planning data be converted for comparability?

Planning data like Gross Domestic Product (GDP), population growth, or forecasted customer counts, would not require numerical conversion, but methodological differences should be documented to avoid misinterpretation. Given differing planning geographies and limited overlap in the energy end uses driving peak and annual demands, most cross-sector comparability would be at the provincial level; local comparability should be addressed bilaterally in high-growth areas.

Enbridge Gas suggests that if this data is shared, the following should occur to enable comparison:

- Gas and electricity demand and conservation data should be provided on an energetic basis (i.e., joules), to characterize peak demand, annual throughput or conservation efforts on the same basis. However, comparability would be limited to the *magnitude* of peak demands, annual throughput, or conservation efforts by service territory.
- A common understanding of how each utility determines and uses weather data in their planning is required. For example, how a utility determines annual heating degrees days or low and high temperatures. For low temperatures, conversion is required between heating degree days and degrees Celsius to enhance comparability.[5]

OEB Staff Question #6 – Information Discussion

How should planning information be discussed among utilities, Indigenous communities and other participants?

Enbridge Gas suggests that the regional electricity planning process and the existing engagements with the broader public, could be used to share summaries of the outcomes of TWG discussions regarding shared planning information with municipalities and indigenous communities. In addition, this approach would be most efficient for an already lengthy process.

Enbridge Gas suggests that for areas of high growth the outcomes of bilateral/multilateral information sharing could be shared or discussed where appropriate through other existing and planned engagements with municipalities, Indigenous communities and urban planners outside of regional electricity planning. Summaries of the information sharing could be provided in relevant applications to the OEB.

OEB Staff Question #7 – Information Application

How should the shared planning information be used?

Outcomes of information sharing should be documented within existing planning documents rather than creating a new coordinated planning report. For electricity, relevant considerations can be captured in RIP or IRRP reports and reflected in LDC Distribution System Planning

[5] For example, Enbridge Gas uses 15°C as the base temperature to convert between degrees Celsius and HDD in system planning.

(DSP) reports. However, Enbridge Gas notes that because the OEB's proposal suggests that shared information is aligned to IESO electricity regional planning areas, there will be limited value derived from a RIP or IRRP report for the OEB when reviewing gas applications.

For Enbridge Gas, the Utility System Plan (USP) draws on Cost of Service application components that already incorporate much of the data the OEB proposes to share, with outcomes reflected in the asset management plan. Enbridge Gas disagrees that a new USP section is required. Instead, discussion of how relevant information was considered could be integrated into existing USP sections or the parts of a Cost of Service application, where it can be assessed in the appropriate context.

Enbridge Gas disagrees with the OEB's alternative approach to create a new coordinated planning report to be filed as evidence. The same outcome can be achieved through existing utility planning documents that already describe what information was shared and how it was used. This approach avoids significant additional reporting and administrative burden for all parties.

OEB Staff Question #8 – Roles

What should be the roles and responsibilities of the OEB, utilities, the IESO, Indigenous communities and other participants in the sharing, discussion and application of planning information?

Clear terms of reference are essential to delineate roles and responsibilities. Further, the terms of reference must clearly articulate the objective of the information sharing forum, which Enbridge Gas understands to be fulfilling the Minister's short-term directive on information sharing. The OEB should facilitate the forum to discuss sharing, discussion and use of planning information, and design the framework to ensure participants remain aligned and focused on achieving this initial deliverable.

In general, Enbridge Gas agrees with the OEB's proposal for the roles of utilities and the IESO.

Non-utility participants and Indigenous communities should have voluntary roles in participation and utilization of shared information; they should not be required to contribute data to the central repository, if one was established, to avoid complexity and potential misinterpretation.

OEB Staff Question #9 – Timing

When should planning information be shared, discussed and applied, and how often?

Enbridge Gas suggests that sharing of planning information should begin at least 6 months after finalization of the framework to allow utilities and the IESO to gather, validate, and prepare data for sharing.

Should the OEB decide to proceed with a central repository, planning information could be updated annually, with resubmissions only when material changes occur or as part of subsequent Cost of Service applications. Given uncertainty and variability in the IESO regional TWG schedules across 21 electricity planning regions, Enbridge Gas proposes a fixed annual submission deadline rather than linking to regional TWG meetings. Discussions could occur at the regional electricity TWG meetings; however, the discussion should remain focused on

shared electricity system information. The gas data shared in these forums would primarily be service territory level information and provincial-level assumptions. Direct discussion between utilities in areas of high growth should occur on an as-needed basis to support timely co-ordination.

Discussions regarding how shared information was considered in planning could be included in Cost of Service applications, and in high-growth areas (in leave-to-construct applications). Given the significant, resource-intensive nature of this work and long planning lead times, utilities will need at least six months to incorporate shared data into system planning, particularly as forecasts filed in Cost of Service applications are often prepared more than 1 year in advance of filing.

OEB Staff Question #10 – Other Issues

What other issues should the OEB consider, including issues related to the OEB's medium-term objective of setting expectations to establish consistent planning assumptions and scenarios?

Enbridge Gas disagrees that the goal of the OEB's medium-term work should be having gas and electric utilities using consistent or identical scenarios (i.e., same supply and demand forecasts) for system planning. This is not appropriate, as aligning on scenarios would not be valuable given that the sectors have different time frames and are required to address different risks. Enbridge Gas believes that "consistent" should be defined as aligning on facts (i.e., building counts/year and location), principles (e.g., safety and reliability first), and evidence (i.e., trends based on measured data). For assumptions made within scenarios, they do not need to be identical.

Enbridge Gas reiterates that an adequate amount of time must be taken to consider feedback from utilities, the IESO, and other participants in the gas-electric forum, and to thoughtfully build the framework that will establish how, what, and on what cadence planning information is shared. Moving too quickly could result in inaccurate information being shared and increased administrative and regulatory burden without commensurate value and foundation for future mid-term objective discussions. Enbridge Gas also reiterates its views on what the ultimate outcome of coordinated planning should be – which is to ensure the timely, cost-effective build-out of infrastructure by each sector – gas and electric – at a pace that enables growth, preserves affordability, supports reliability and resiliency, and upholds consumer choice.

Finally, Enbridge Gas emphasizes that the activities required to satisfy sections 1 and 2 of the Directive are significant and resource-intensive for all parties, and particularly for Enbridge Gas. For Enbridge Gas to engage in information sharing and co-ordination at its service-territory-level, potentially involving participation in the IESO's 21 annual regional planning meetings, TWG meetings for the 5-6 areas with active regional electricity planning, and direct engagement with LDCs in high-growth areas will require substantial time and effort. These challenges are compounded by the misalignment between gas and electric planning regions and the presence of more than 60 LDCs across Ontario. Enbridge Gas highlights that the IESO already has resources to support regional electricity planning as part of their ongoing course of business. Enbridge Gas must be afforded the ability to fund dedicated resources for gas-electric information sharing and co-ordination, including in high-growth areas. Absent this capability,

Enbridge Gas expects that both the effectiveness of its efforts and the achievement of the intended outcomes would be negatively impacted.