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**Enbridge Gas Inc.**  
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**VIA EMAIL and RESS**

March 6, 2026

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)  
Ontario Energy Board (“OEB”) File No. EB-2023-0125  
Consultation for Benefit-Cost Analysis Framework for Addressing Electricity  
System Needs (“BCA Framework”) – Phase Two  
Comments on Draft Revisions to the BCA Framework**

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Pursuant to the OEB’s letter dated February 6, 2026 in the above-noted proceeding, enclosed please find Enbridge Gas’s comments on the draft Phase Two revisions to the BCA Framework.

If you have any questions, please contact the undersigned.

Sincerely,

*Haris Ginis*

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Technical Manager, Regulatory Applications

cc: James Smith (OEB Staff)

## **A. BACKGROUND**

1. On February 6, 2026, the OEB released draft revisions to the Benefit-Cost Analysis Framework for Addressing Electricity System Needs (“BCA Framework”) and invited registered participants to submit written comments on the draft revisions by March 6, 2026. Enbridge Gas’s comments are provided below.

## **2. ENBRIDGE GAS COMMENTS**

### **General Comments**

3. Enbridge Gas understands that the BCA Framework is intended to support the assessment of non-wires solutions (“NWS”) to address electricity system needs and reflects electricity-sector policy considerations. On that basis, as a natural gas distributor, Enbridge Gas does not take any substantive positions on the draft revisions to the BCA Framework and limits its comments to promoting regulatory clarity/efficiency and avoiding unintended implications for the natural gas sector.
4. Enbridge Gas expects that natural gas sector cost-effectiveness issues will be addressed in natural gas proceedings (for example, in the Company’s 2027-2030 Demand-Side Management (“DSM”) Plan proceeding<sup>1</sup> and the OEB’s Integrated Resource Planning (“IRP”) Framework Review proceeding<sup>2</sup>). These proceedings provide the appropriate forum to consider these issues as they relate to the natural gas sector specifically. Accordingly, any determinations in this electricity proceeding should not be presumed to apply to the natural gas sector nor be relied upon in natural gas proceedings.
5. To promote regulatory clarity and efficiency, Enbridge Gas submits that the BCA Framework should avoid references that could be read as importing natural gas DSM or IRP concepts into the electricity BCA Framework. Including such references risks creating confusion as to the applicability and appropriateness of natural

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<sup>1</sup> EB-2025-0295.

<sup>2</sup> EB-2025-0125.

gas-specific concepts to electricity frameworks, and vice versa, given their differing policy contexts and objectives.

#### **Section 4.2 – Consideration of Societal and Non-Energy Benefits (*New Section*)**

6. Consistent with Enbridge Gas’s submissions in other proceedings,<sup>3,4</sup> the Company reiterates the principle that where the OEB establishes or updates regulatory frameworks, those frameworks must be consistent with Government of Ontario policy, including but not limited to the Integrated Energy Plan.<sup>5</sup> OEB regulatory frameworks should not be used to advance objectives or outcomes that have not been adopted (or have been expressly rejected) by government policy.

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<sup>3</sup> EB-2025-0125 OEB IRP Framework Review, Enbridge Gas Comments on OEB Staff Discussion Paper, November 19, 2025, pp. 4-7 ([link](#)).

<sup>4</sup> EB-2025-0295 Enbridge Gas 2027-2030 DSM Plan Application, December 18, 2025, Exhibit C, Tab 1, Schedule 2 ([link](#)).

<sup>5</sup> Government of Ontario, *Energy for Generations: Ontario’s Integrated Plan to Power the Strongest Economy in the G7* (“Integrated Energy Plan” or the “IEP”), June 2025 ([link](#)).