



PUBLIC INTEREST ADVOCACY CENTRE
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Review of Enbridge Gas Inc.

Five-Year Gas Supply Plan

EB-2025-0065

Submission of the
Vulnerable Energy Consumers Coalition
(VECC)

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Vulnerable Energy Consumers Coalition

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Overview

1. Our submissions on the matter of Enbridge Gas Inc.'s (EGI) gas supply planning are similar to those made with respect to its prior plans. Overall, we believe EGI carries out prudent gas planning. As noted by EGI¹ this process is not expected to result in an order of the Board but rather an assessment as to whether the Utility is adhering to the Framework for the Assessment of Distributor Gas Supply Plans (Framework)². We believe EGI is adhering to the Framework
2. Below we address each issue set out in the Board's Decision on Issues List of August 8, 2025. However, our main observation is with the OEB Framework. Our observation is that while significant time and effort is put into EGI's gas supply planning review no effort is made by the Board to consider the ongoing nature or impact of the direct purchase gas supply market for low volume general service customers.
3. This is interesting given that theoretically (if not in practice) a benefit of private market competition with regulated gas supply is that consumers have an attractive alternative in the face of any monopoly supply malpractice. Given the moribund disfunction of the retail general service direct purchase market it is unlikely that Ontario's competitive gas supply market actual does provide any value or check on the alternative of regulated supply. If true, this begs the question as to what the energy regulator should be doing in respect to non regulated gas supply offers and what advice it might be provide the Ontario Legislature that would a give better choice to small volume consumers.

Does the 5-year gas supply plan appropriately reflect and balance the three OEB gas supply guiding principles in a way that is prudent and delivers value to customers

4. Yes, it is evident that EGI has considered cost-effectiveness, reliability and security of supply and public policy as set out in the OEB's Framework.

¹ EGI Argument-in-Chief (AIC), November 25, 2025

² EB-2017-0129 Report of the Ontario Energy Board, Framework for the Assessment of Distributor Gas Supply Plans (Framework).

Does the 5-year gas supply plan appropriately address the gas supply plan criteria set out in the OEB’s Framework for the Assessment of Gas Distributor Gas Supply Plans (Framework):

- a. Demand forecast analysis**
 - b. Supply option analysis**
 - c. Risk mitigation analysis**
 - d. Achieving public policy objectives**
 - e. Procurement process and policy analysis**
 - f. Performance measurement**
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- 5. In general, we believe that EGI has adequately addressed these criteria.
- 6. With respect to risk mitigation we note EGI has discussed the issue of U.S. trade policy. Natural gas sourced or transported through the U.S. is vulnerable to the current capriciousness of U.S. trade policy. No specific actions, other than a plan to record incremental costs of such actions are noted in the plan.
- 7. It is not clear to us what contingency plans could be made given the limited “Canadian only” supply and transportation options currently available. However, in the event, EGI would be challenged by parties as to what efforts it had made to limit gas cost increases attributable to changes in U.S. trade policy. We suggest a lack of specific contingency plan could be a reason for future disallowance of some gas costs.

Does the 5-year gas supply plan provide appropriate gas supply plan outlook information?

- 8. Yes, with the proviso above that EGI does not appear to have done any formal risk analysis or risk mitigation resulting from U.S. sourced or transported natural gas.

Is Enbridge Gas’s planned approach to execution of the 5-year gas supply plan appropriate, including implementing changes resulting from Phases 2 and 3 of the 2024 Rebasing Proceeding in future Annual Updates?

9. *“The current Gas Supply Plan does not reflect changes that result or will result from Phase 2 or 3 of the Rebasing Proceeding”*³. Ergo the above issue cannot be answered at this time. Having said that we have no outstanding concerns at this time and expect future proceedings to address this issue in detail.

Has Enbridge Gas responded appropriately to previous commitments, OEB staff reports and OEB decisions as they relate to the 5-year gas supply plan?

10. Yes

Has Enbridge Gas filed appropriate evidence and explanation to support its 2025 Annual Update to the previous 5-year gas supply plan?

11. Yes. Natural gas transactions with affiliated or related companies generally come under the most scrutiny. In this case, as in the past, the renewal of Vector pipeline capacity has been of particular interest. In our view EGI has provided adequate rationale for continuing to contract on this pathway.

Should the OEB review and/or amend the Framework and/or annual review process (including timing)?

12. Mostly. We have two comments with respect to the Framework and annual process. Generally, we continue to think the process is effective and EGI participates in it fully.
13. With respect to process. It is not always clear to us it needs to be as exhaustive as was the case here. Specifically, we question the need for a separate “issues list” process in a matter that is being judged against an already explicit set of issues (i.e. against the Framework).
14. Similarly, we observe that even for adjudicated cost of service rate applications a technical conference is not always required. It may be worth considering combining a technical conference and a settlement process. In order to not turn this into a lengthier alternative the Board would need to be specific as to the time allocated to such a process so as to ensure a quick decision can be made to move to written submission in the absence of a settled alternative.
15. With respect to merits of the Framework. As said at the outset it is striking to us the amount of scrutiny placed on EGI’s gas supply planning given there exists an

³ AIC November 25, 2025, page 11

alternative of retail gas supply (direct purchase). If the competitive natural gas market was functioning efficiently in Ontario then the competitive alternative would be a natural check on the offering of the regulated utility. For the general service low volume market this is clearly not the case.

16. It would appear that the competitive market for low volume customers exists as only one product - long-term fixed price contracts. The premiums of which are so high, and the questionability of the vendor to meet its commitment in the case of gas price stress so uncertain, that only the uninformed seem willing to enter into such arrangements. Since the banning of door-to-door sales this market is (deservedly) a tiny fraction of the gas sales in the low volume general service market.
17. Nevertheless, one might assume the regulator would be interested in this alternative market as part of its examination of EGI's gas planning. This would require information as to whether what we say above has any veracity and if so what might be done about it. Should EGI be able to offer term fixed price contracts to consumers? If not, why not. Presumably competitors can offer monthly priced products in competition to the regulated supply. Why is that? What is so special or sacrosanct about a term fixed price gas contract for a residential consumer that it can only be offered, apparently unsuccessfully, by this moribund retail market?
18. These comments are not made to advocate for any changes in the gas supply planning of EGI in this proceeding. Nor do we have specific recommendations regarding the low volume retail gas market. What we are suggesting is that the Board consider expanding the Framework so as to have a "snapshot" of the competitive gas supply alternatives which, in theory at least, form an alternative to regulated gas supply. This might include information provided by EGI. This might include information they collect to be able to accommodate the low volume direct purchase market, and other relevant matters they gather on the nature and extent of the market as required to interact with as the monopoly distributor.
19. This type of information might be helpful to policy makers as they consider the future of how natural gas is purchased by low-volume consumers. We recognize that the issue of the interaction of the retail market and EGI's regulated gas supply which serves the monthly priced market is not an issue specifically identified in this proceeding. As such we do not expect EGI to be in the position to respond to the issue of the nature of the retail market. We do think it might be worthwhile to understand in future gas supply proceedings what information on the low volume retail market EGI's possesses and which could be made publicly available. This might help the Board better understand the nature of the low volume retail market and how it influences (or not) EGI's own gas supply planning.

Should the gas supply plan consider and include supply-side IRP options where those could be impacted by gas transportation arrangements and/or gas contracting?

20. No, the gas supply plan should not consider IRP options specifically. We accept EGI's explanation that IRP options are inherent in gas supply planning⁴. In our view the gas supply plan is provided on the basis of assets that are either immediately available, or are planned to be available and in accordance with prior decisions of the Board. The merits, or lack thereof, of asset planning by the Utility should not be revisited in this process. Specifically, we believe that this is not a forum in which to reassess the capital planning strategies of the Utility.

These are our submissions

VECC submits that it has acted responsibly and efficiently during this proceeding and requests that it be allowed to recover 100% of its reasonably incurred costs.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

⁴ AIC, page 15