



Richard Wathy
Technical Manager
Regulatory Applications
Regulatory Affairs

Cell: 519-365-5376
Email: Richard.wathy@enbridge.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive N.
Chatham, Ontario, N7M 5M1
Canada

VIA EMAIL

March 12, 2026

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No. EB-2022-0192
Green Button Extension of Time to Comply**

Enbridge Gas is hereby applying to the OEB for a further extension to comply with s. 25.35.8 of the *Electricity Act, 1998* (Act), and sections 2 and 4 of O. Reg. 633/21, Energy Data (Regulation), made under the Act (together, the Green Button implementation requirements).

Background

On July 5, 2022, the OEB approved Enbridge Gas's application for an extension of the date by which it must comply with the Green Button implementation requirements for its large volume distribution customers (LVDCs) and unbundled customers. The OEB granted an extension to December 31, 2026.

Extension Request

Enbridge Gas hereby requests, pursuant to section 5 of the Regulation, an extension of the time period to implement Green Button for its 515 LVDCs and 4 unbundled customers. Specifically, Enbridge Gas seeks to extend the compliance date from December 31, 2026, to no later than December 31, 2027 to align with the replacement of the Enerline system as outlined below:

- 1) Currently, the LVDCs have direct access to their account information (or "energy data", as defined in the Regulation) through Enerline, which is the existing self-serve system that Enbridge Gas uses for these LVDCs. Enerline also allows LVDCs to provide approval for a third-party to access the LVDC's account information. Enerline is a secure, self-serve transaction and information tool that provides customers and any third-party they authorize with the ability to connect online and download information in a manner similar to Green Button.

For instance, Enerline provides access to daily and hourly consumption data. Up to 65 days of historical consumption can be retrieved automatically through Enerline Direct Connect (similar to Green Button's Connect My Data). Additional historical daily data can also be retrieved through Enerline's Distribution Measurement download feature (similar to Green Button's Download My Data).

All LVDCs have access to Enerline, and approximately 94% of them are active users. This suggests that the vast majority of LVDCs consider Enerline to be useful for the intended purpose of providing access to account information.

- 2) The 4 unbundled customers referenced are primarily power generators. These are highly sophisticated customers who contract for their own upstream services (gas transportation and supply) and track their own gas consumption on a continuous basis. These customers have direct access to their own daily consumption data because they must balance their supply and consumption on a daily basis.
- 3) Commencing in 2023, Enbridge Gas has started work to replace Enerline and associated systems (for contracting, gas management and billing), including the systems used for the 4 unbundled customers, with new systems. These system changes are being planned to go into service by the end of 2027 to allow time to align the changes with the timing outlined in the Rebasing Phase 3 Settlement Proposal.¹

Enbridge Gas is developing the new systems with required functionality to ensure Green Button compliance.

- 4) Because Enbridge Gas plans to decommission Enerline and the associated systems in the near term, it would not be prudent for Enbridge Gas to incur incremental costs (that are difficult to estimate but may be up to \$2 million for the 519 customers) to modify the existing systems for Green Button compliance. This is especially true given that these 519 customers already have access to their own consumption information and can provide third parties with access to it.

Enbridge Gas implemented Green Button for all of its customers (with the exception of the LVDCs and unbundled customers noted above) by the November 2023 deadline.

In summary, for the reasons cited above, Enbridge Gas seeks a further extension of the Green Button implementation timeline for its 515 LVDCs and 4 unbundled customers to no later than December 31, 2027.

Enbridge Gas would be pleased to answer any questions about this request.

We look forward to the OEB's further directions in respect of this matter.

¹ EB-2025-0064, Settlement Proposal, Exhibit N1, Tab 1, Schedule 1, updated January 21, 2026, p. 45.

Should you have any questions on this matter please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Richard Wathy".

Richard Wathy
Technical Manager, Regulatory Applications

cc: Eamon O'Riordan, Case Manager, Consumer Protection & Industry Performance (OEB)
Tania Persad (Enbridge Gas Counsel)
Victoria Wang, Manager Digital Channels & Analytics (Enbridge Gas)