

May 22, 2026

VIA RESS AND EMAIL

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)
EB-2025-0064 - 2024 Rebasing and IRM – Phase 3
Enbridge Gas Submissions on Cost Claims**

The Ontario Energy Board (OEB) issued its Decision on rate making matters for Phase 3 of the Rebasing Application (EB-2025-0064) on March 26, 2026. On April 28, 2026, the OEB issued Procedural Order No. 6 which established a process for final cost awards for costs incurred to the end of the Settlement Proposal Presentation Day on February 17, 2026. The OEB also directed Enbridge Gas to file and forward to intervenors any objections to cost claims by May 22, 2026.

The following parties submitted cost claims for Phase 3 of the proceeding: the Association of Power Producers of Ontario (APPRO); Building Owners and Managers Association (BOMA); Canadian Biogas Association (CBA); Consumers Council of Canada (CCC); Canadian Manufacturers & Exporters (CME); Energy Probe Research Foundation (Energy Probe); Environmental Defence (ED); Federation of Rental-housing Providers of Ontario (FRPO); Ginoogaming First Nation (GFN); Industrial Gas Users Association (IGUA); London Property Management Association (LPMA); Minogi Corp. (Minogi); Ontario Association of Physical Plant Administrators (OAPPA), Ontario Greenhouse Vegetable Growers (OGVG); Ontario Home Builders' Association (OHBA); Pollution Probe (PP); Quinte Manufacturers Association (QMA); School Energy Coalition (SEC); Three Fires Group Inc. (Three Fires) and Vulnerable Energy Consumers Coalition (VECC).

Overview

The total of the cost claims filed is approximately \$1.1 million as shown in Table 1. This total includes approximately \$66,000 for expert support in review and analysis of Enbridge Gas's Phase 3 rate design and cost allocation proposals.

Table 1

Intervenor	Cost Claim		Hours	Hours	
	Including Expert Support	Excluding Expert Support		Including Expert Support	Excluding Expert Support
APPRO	\$65,693	\$65,693	220		220
BOMA	\$52,737	\$52,737	130		130
CBA	\$5,679	\$5,679	14		14
CCC	\$68,649	\$68,649	201		201
CME	\$45,457	\$45,457	159		159
Energy Probe	\$49,897	\$49,897	123		123
Environmental Defence	\$20,183	\$20,183	65		65
FRPO	\$109,824	\$109,824	268		268
GFN	\$34,451	\$34,451	123		123
IGUA	\$156,596	\$91,519	386		226
LPMA	\$69,775	\$69,775	172		172
OAPPA	\$43,407	\$43,407	107		107
OGVG	\$90,383	\$90,383	223		223
OHBA	\$20,219	\$20,219	74		74
QMA	\$22,318	\$22,318	99		99
Pollution Probe	\$57,707	\$57,707	142		142
SEC	\$94,181	\$94,181	275		275
Three Fires	\$19,798	\$19,798	87		87
Minogji	\$16,992	\$16,992	74		74
VECC	\$62,782	\$62,782	168		168
TOTAL	\$1,106,728	\$1,041,651	3,110		2,949

Submissions

Enbridge Gas has reviewed the cost claims and noted that the majority of the hours submitted by intervenors (over 60%) are for the settlement conference, with the remaining hours for the discovery process and other procedural steps up to February 17, 2026. The apportionment of costs is consistent with the time invested during the three-month settlement conference to reach agreement on all issues eligible for settlement.

In review of the submissions, Enbridge Gas has two observations for the OEB to consider regarding the costs claimed by intervenors.

First, IGUA has submitted approximately 160 hours (or approximately \$66,000) for expert support from Mr. Dustin Madsen of Emrydia Consulting Corporation to assist in the review and analysis of Enbridge Gas's proposals and the alternative scenarios¹. IGUA submitted a letter on May 30, 2025, that informed the OEB that it was retaining Mr. Madsen for expert support and potentially leave to file evidence. IGUA noted that the cost to prepare and present the evidence from Mr. Madsen would be approximately \$50,000. In a subsequent letter submitted on July 18, 2025, IGUA informed the OEB that it would not seek leave to file evidence but would continue to work with Mr. Madsen to refine its understanding of Enbridge Gas's proposals. Enbridge Gas is surprised by the amount of the cost claim as there was no intervenor evidence filed in the proceeding. The ultimate cost for background support provided by Mr. Madsen is higher than what was estimated for him to prepare evidence.

¹ EB-2022-0200 Settlement Proposal.

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Second, Enbridge Gas has observed that the hours submitted by FRPO for the discovery process are relatively higher than other intervenor submissions. Of the total 268 hours (or \$110,000) submitted by FRPO, approximately 138 hours (or \$56,000) relate to the discovery process, including read and research the application and evidence, prepare and review interrogatories and technical conference preparation, attendance and follow-up. By comparison, the next three highest intervenor claims for the discovery process range between 80 to 86 hours, and the average of all intervenors is approximately 54 hours.

Should you have any questions, please let us know.

Sincerely,

Robin Stevenson

Robin Stevenson
Technical Manager, Strategic Applications – Rate Rebasing