

VIA EMAIL and RESS

June 11, 2026

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

Dear Ritchie Murray:

**Re: EB-2025-0065 - Enbridge Gas Inc. (Enbridge Gas)
2025 Annual Update to the 5 Year Gas Supply Plan
Comments on Cost Claims**

In accordance with the Ontario Energy Board's (OEB) Decision and Order issued on May 21, 2026, Enbridge Gas has reviewed the requests for cost claims received from the following:

- Building Owners and Managers Association's (BOMA),
- Consumers Council of Canada (CCC),
- Canadian Manufacturers & Exporters (CME)
- Energy Probe (EP),
- Environmental Defence (ED),
- Federation of Rental-housing Providers of Ontario (FRPO),
- Ginoogaming First Nation (GFN),
- Industrial Gas Users Association (IGUA),
- Pollution Probe (PP),
- School Energy Coalition (SEC),
- Minogi Corp. (Minogi), and
- Vulnerable Energy Consumers Coalition (VECC).

Enbridge Gas has no concerns with the cost claims submitted by intervenors, aside from the claim filed by FRPO.

Upon review, Enbridge Gas notes that FRPO has claimed a total of approximately 133 hours in relation to this proceeding. This level of time claimed is significantly higher than that of other intervenors, as illustrated below:

Table 1
Comparison of Intervenor Hours

Intervenor	Hours Claimed
FRPO	133
Minogi	40.30
CCC	40
GFN	36.80
SEC	34.70
PP	32.75
ED	31.20
EP	28
BOMA	27.75
CME	25.40
VECC	23
IGUA	22.10

As shown above, other intervenor claims ranged between 22 and 40 hours, whereas the FRPO claim of 133 hours, significantly exceeds the range of time observed across other parties.

Enbridge Gas acknowledges that FRPO takes a particular interest in gas supply matters and acknowledges FRPO's statement that other parties rely upon the work done by FRPO in this area. However, even taking that into account, Enbridge Gas believes that the time and cost for FRPO's work on this matter is unreasonable.

This is seen in two areas.

First, under the topic of "Discovery", which includes reviewing the evidence, preparing and reviewing interrogatories, and preparing for and attending and follow-up from the technical conference, FRPO claims 69.5 hours. The next highest claim for these activities is 25 hours from CCC. Enbridge Gas submits that the time spent by FRPO on these discovery activities is excessive and disproportionately high.

Second, under the topic of "Written Argument", FRPO claims 37 hours where the next highest claim from another party is 13 hours from GFN. Again, this time is excessive and disproportionately high. Of particular concern here is the fact that most of FRPO's argument (at least 11 pages of FRPO's 20 page submission) is a proposal that Enbridge Gas should be directed to purchase more than 33% of its winter gas supply by entering into fixed-price purchase contracts more than four months in advance of delivery of the gas during the winter season, in order to increase price stability. FRPO had the opportunity to file evidence, which would have allowed its proposal to be tested.

It did not do that. Instead, FRPO introduced the detailed proposal for the first time in argument, which went far beyond the level of comments or suggestions normally made in the argument phase. This required Enbridge Gas to prepare and file a detailed Reply Argument in response. Enbridge Gas set out many reasons why FRPO's proposal should not be accepted, starting with the fact that FRPO's fixed-price purchase proposal is an evidentiary filing that has not been tested. In its Decision and Order, the OEB agreed with Enbridge Gas, finding that *"[t]he proposal presented in this proceeding is not sufficiently developed or tested to support implementation. The proposal was not supported by any evidence, was not subject to discovery, and does not include analysis of alternative structures, risk implications, operational considerations or cost impacts."*¹

Enbridge Gas submits that FRPO's claimed hours should be assessed accordingly.

While Enbridge Gas acknowledges the level of effort reflected in FRPO's participation, the time claimed is excessive compared with other intervenors, including those who considered or relied upon aspects of FRPO's work, and the resulting proposal presented did not follow the procedural steps outlined by the OEB. Accordingly, Enbridge Gas submits that a reduced award would strike an appropriate balance between recognizing FRPO's contribution and engagement with other parties, and reflecting a reasonable level of time for this proceeding.

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

Yours truly,



Richard Wathy
Technical Manager, Regulatory Applications

cc: David Stevens, Aird & Berlis
BOMA, CCC, CME, EP, ED, FRPO, GFN, IGUA, PP, SEC, Minogi, and VECC

¹ EB-2025-0065, OEB Decision and Order, May 21, 2025, p.15.