

VIA RESS and EMAIL

August 23, 2026

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc.
2024 Rebasing – Phase 3
Consumers Council of Canada (CCC) Submission on Unsettled Issues
OEB File No. EB-2025-0064**

In accordance with Procedural Order No. 7, dated August 10, 2026, please find attached CCC's submission with respect to the unsettled issues in Phase 3 of Enbridge Gas Inc.'s 2024 rebasing proceeding.

Yours truly,



Lawrie Gluck
Consultant for the Consumers Council of Canada

cc: All parties in EB-2025-0064

Enbridge Gas Inc.

2024 Rebasing – Phase 3

EB-2025-0064

Consumers Council of Canada Submission on Unsettled Issues

August 23, 2026

Introduction

Enbridge Gas Inc. (Enbridge Gas) filed an application on February 28, 2025, with respect to certain cost allocation and rate harmonization issues associated with its 2024 rebasing proceeding (Phase 3 Application). The Phase 3 Application also includes evidence regarding Enbridge Gas's responses to certain OEB directions and commitments made in previous OEB proceedings.

On March 26, 2026, the OEB issued a Decision on Settlement Proposal and Rate Order, which approved a settlement proposal covering all the immediate ratemaking issues in the current proceeding. Issue 13 (sub-parts (a) through (d)) did not form part of the OEB-approved settlement proposal. Issue 13 (sub-parts (a) through (d)) is copied below.

Has Enbridge Gas identified and responded appropriately to all relevant OEB directions and Enbridge Gas commitments made in OEB proceedings (inclusive of any relevant directions arising from the OEB's pending decision on Phase 2), including those relating to:

- a) an update on the Automated Metering Infrastructure pilot project;
- b) a report on the steps that it has taken to achieve the capital reduction set out in the Phase 1 Decision;
- c) reporting on the status of its responses to previous Integrated Resource Planning directions;
- d) filing updated written marketing materials or reference materials aimed at customers, potential customers, HVAC contractors or builders that include or previously included energy comparison information.¹

The Consumers Council of Canada (CCC) submits that Enbridge Gas has generally responded appropriately to each of the above noted directions and commitments. We have specific comments about the Automated Metering Infrastructure pilot project (Issue 13(a)) and the written marketing materials (Issue 13(d)), which are set out in the sections that follow.

¹ Decision on Issues List and Procedural Order No. 2, May 16, 2025, Schedule A, p. 2.

Automated Metering Infrastructure Pilot Project

Enbridge Gas filed the necessary information regarding the Advanced Metering Infrastructure (AMI) pilot project in the current proceeding to satisfy the requirement set out in Issue 13(a). However, CCC is concerned with Enbridge Gas's position regarding large-scale deployment of AMI.²

Enbridge Gas's position appears to be that it will provide more information to the OEB regarding large-scale deployment of AMI, but it may not seek OEB approval of the costs of this work in advance of the costs being incurred.³ In this regard, Enbridge Gas could begin large-scale deployment in the current incentive ratemaking term in the absence of OEB approval.⁴

CCC notes that large-scale deployment of AMI will be very expensive⁵ and have material impacts on consumers' natural gas bills. On this basis, we submit that Enbridge Gas should not move forward with more widespread AMI deployment until the OEB has an opportunity to consider the costs and benefits of this activity. Given that Enbridge Gas will be filing a 2029 rebasing application (likely towards the end of 2027), we submit that any proposal for large-scale deployment of AMI be included in that application and subject to the OEB's review prior to further AMI deployment (beyond the existing proof of concept) occurring.

Marketing Materials with Energy Comparison Information

CCC submits that consumers can only make sound energy decisions if the information before them is accurate, complete, balanced and timely. It is of the utmost importance that consumers have the necessary information to make informed decisions. Ensuring that Enbridge Gas meets that standard is fundamental to both consumer protection and a well-functioning energy marketplace.

Enbridge Gas confirmed that, except for certain information provided with respect to Enbridge Gas sponsored demand-side management (DSM) and Integrated Resource Planning (IRP) pilot programs, it has ceased providing energy cost comparison information

² Argument-in-Chief, August 17, 2026, p. 3.

³ Exhibit I.2.7-CCC-2.

⁴ Technical Conference Transcripts, Vol. 1, July 16, 2025, pp. 41-44.

⁵ Ibid., p. 44. Enbridge Gas stated that the cost of large-scale AMI deployment is certainly in the range of hundreds of millions of dollars.

in its general marketing materials targeted at its broad customer base as attested to in its statutory declaration.⁶ For certain DSM and IRP-related consumer-facing materials, Enbridge Gas does provide energy comparison information, which includes comparisons related to electric cold climate heat pumps⁷ in accordance with the Phase 2 settlement proposal.⁸

CCC accepts that Enbridge Gas has complied with the requirements of Issue 13(d) and the commitment set out in the Phase 2 settlement proposal. However, compliance with the relevant commitment does not mean that the energy comparison information cannot be improved for the benefit of consumers' understanding of their energy choices. CCC notes that Enbridge Gas currently has no plans to update its energy cost comparison information that is provided in the limited circumstances of certain DSM programming and IRP-related pilot programs.⁹ Enbridge Gas also stated that it will consider any relevant direction arising from the OEB's decision in the current proceeding on its DSM-related programming (and presumably, the related marketing materials) at the appropriate time.¹⁰

CCC submits that certain changes should be made to the energy cost comparison information to improve the usefulness to consumers when they are making decisions regarding home heating options. In this regard, we submit that the OEB should direct Enbridge Gas to make the targeted improvements set out below to improve the accuracy and completeness of the relevant marketing materials.¹¹

Fixed Charges

We do not believe that fixed charges should be added to the energy cost comparison directly as the evidence is clear that most customers maintain gas service for space heating even when installing a cold climate heat pump (and therefore, will continue to pay the monthly charge).¹² However, instead of a disclaimer that states only that fixed charges are excluded from the comparison¹³, the disclaimer should also note that, if a customer

⁶ Argument-in-Chief, August 17, 2026, pp. 9-11 and Statutory Declaration.

⁷ Enbridge Gas Letter, May 1, 2026, Attachment 1.

⁸ EB-2024-0111, Settlement Proposal, Exhibit N, Tab 1, Schedule 1, p. 34.

⁹ Exhibit I.Staff.EGIReply-1, p. 2.

¹⁰ Exhibit I.Staff.EGIReply-1, Attachment 1, p. 3.

¹¹ We note that our suggested improvements are with respect to the energy comparison information that is currently being used by Enbridge Gas with respect to certain DSM-related programming and IRP-related pilot programs. CCC intends to make submissions on Enbridge Gas's proposed DSM plan (and related budgets) in the EB-2025-0295 proceeding.

¹² Enbridge Gas Reply Evidence, pp. 7-8.

¹³ For example, see Enbridge Gas Letter, May 1, 2026, Attachment 1, p. 2.

were to fully disconnect from the gas system, the Enbridge Gas monthly charge¹⁴ would be eliminated.

Annual Illustrative Comparison

In addition to the monthly illustrative comparison that is already provided, which is based on January heating requirements¹⁵, an annualized view of energy costs/savings should also be provided. This will provide a more comprehensive view of the cost differences between heating systems over a full year of operation, rather than only at the highest heating load point of the year. CCC is not suggesting that the January illustrative comparison be removed as it does provide useful information for the most expensive heating month, which is useful on its own for household budgeting purposes.

Furnace Fan Electricity Use

It appears that the energy cost comparison information reflects the costs of defrost cycles for cold climate heat pumps.¹⁶ In contrast, the costs associated with the electricity use to power furnace fans appear to be excluded from the cost comparison.¹⁷ The comparison should be designed in a consistent manner. Therefore, the noted ancillary electricity consumption (and associated cost) should either be: (i) included for both cold climate heat pumps and natural gas furnaces; or (ii) excluded for both cold climate heat pumps and natural gas furnaces.

Neutral Language

There are a few statements in the energy cost comparison materials that should be made in a more neutral manner.

For example, the Home Renovation Savings (HRS) program-related materials state that “[y]our total energy bill will depend on these settings and local rates. Your **total energy bill may go up** where electricity is more expensive than natural gas (per equivalent unit of heating after accounting for your realized equipment efficiency), and vice versa.”¹⁸ This can

¹⁴ The dollar amount of the monthly charge (updated annually) should also be included in the disclaimer.

¹⁵ For example, see Enbridge Gas Letter, May 1, 2026, Attachment 1, p. 2 and footnote (a).

¹⁶ Enbridge Gas Letter, May 1, 2026, pp. 3-4.

¹⁷ Energy Futures Group Evidence, May 15, 2026, p. 7.

¹⁸ Enbridge Gas Letter, May 1, 2026, Attachment 1, p. 2. The emphasis is included in the original.

be revised to state that “...your total energy bill may go up or down depending on the price of electricity relative to natural gas after accounting for your realized equipment efficiency.”

In addition, the materials state that “[n]atural gas and electricity have different costs per unit of energy. As of January 2026, electricity costs are more than 4 times higher per energy unit than natural gas, however heat pumps are more efficient than gas furnaces.”¹⁹ To the extent that the fuel cost differential value is provided (i.e., electricity is 4 times more expensive than natural gas per unit of energy), the efficiency ratio (i.e., cold climate heat pumps are 2x-4x more efficient than natural gas furnaces) should also be provided in the same sentence.

~ All of which is respectfully submitted ~

¹⁹ Ibid., p. 3.