



BY EMAIL and RESS

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2300 Yonge Street
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August 26, 2026
Our File: EB20250064

Attn: Ritchie Murray, Registrar

Dear Mr. Murray:

Re: EB-2025-0064 – Enbridge Gas Inc. Phase 3 – SEC Submissions

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 7, these are SEC’s brief submissions on issues not eligible to be settled (Issues 13, (a)-(d)).

AMI Pilot

Enbridge was required to provide an update on its Automated Metering Infrastructure (“AMI”) pilot project, which it has done. SEC’s concern is not with the pilot project or Enbridge’s fulfillment of the requirement in the Phase 1 decision, but rather with Enbridge’s position regarding possible widespread deployment before the OEB has an opportunity to approve the associated expenditures through an ICM or rebasing application.¹

Although Enbridge would be at risk of a finding of imprudence, as a practical matter, such a finding is often treated as a measure of last resort, because it involves disallowing utility costs that have already been incurred.

Given the magnitude of the project, the cost of which Enbridge said will be “certainly in the hundreds of millions”², the OEB should make clear that the company should not make any significant financial commitments, including entering into contracts with vendors, let alone begin work on a system-wide deployment of AMI meters, without prior OEB approval. The costs and benefits of AMI meters are also tied to a number of broader issues which Enbridge is required to report at rebasing pursuant to the Phase 1 decision.³

Integrated Resource Planning

SEC has been critical of Enbridge’s commitment to and implementation of the IRP Framework.⁴ A number of the IRP commitments on which Enbridge is required to report as part of Phase 3 are

¹ Technical Conference, Tr.1, p.42; Interrogatory Response 2.7-CCC-2

² Technical Conference, Tr.1, p.43

³ For example, the requirement to file a revised Asset Management Plan that links capital spending and energy transition risk (See [Decision and Order \(EB-2020-0200\), December 21, 2023](#), p.140

⁴ For example, see EB-2022-0200 [SEC Phase 1 Final Argument](#), p.82-85; EB-2025-0125, [SEC Submissions on IRP Framework Review](#) (November 19, 2025)



intertwined with those concerns. The deficiencies have been identified in the IRP Technical Working Group's Annual Reports by numerous non-utility members⁵, including SEC's senior counsel, Jay Shepherd, whose comments SEC agrees with.

However, since the initial discovery phase of this proceeding, the OEB has undertaken an IRP Framework Review, and Enbridge has been directed to file an updated Framework for full adjudication by the end of the month. Considering these developments, SEC submits that the upcoming IRP Framework proceeding is the most efficient forum in which to address these issues.

Yours very truly,

Shepherd Rubenstein P.C.

A handwritten signature in black ink, appearing to read 'MR', with a long horizontal stroke extending to the right.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

⁵ For example, see [2025 IRP TWG IRP Annual Report](#) EB-2026-0108, G-2-1, p.66-73); [2024 IRP TWG Annual Report](#) (EB-2025-0155, G-2-1, p.67-75); [2023 IRP TWG Annual Report](#) (EB-2024-0125, H-1-1, p.57-66)