

BY EMAIL and RESS

August 26, 2026

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

Dear Mr. Murray:

EB-2025-0064 Enbridge Gas Inc. (Enbridge Gas) 2024 Rebasing Phase 3 – Building Owners and Managers Association Toronto (BOMA Toronto) Submission on Unsettled Issues

Pursuant to Procedural Order No. 7, issued August 10, 2026, BOMA Toronto files this submission on the unsettled issues in the above noted proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Clement Li", written in a cursive style.

Clement Li

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EB-2025-0064 Enbridge Gas Inc.

2024 Rebasing Phase 3

Building Owners and Managers Association Toronto

Submission on Unsettled Issues

INTRODUCTION

In its Procedural Order No. 3, issued August 1, 2025, the Ontario Energy Board (OEB) has decided that Issues 13 (a) through (d) of the Issues List will proceed directly to hearing and will not be canvassed in the settlement conference. Subsequently, in its Procedural Orders No. 5 and No. 7, the OEB has determined that it will proceed by way of a written hearing for these remaining issues and set out the timeline for written argument from parties. The Unsettled Issues are:

Issue 13: 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;

BOMA TORONTO SUBMISSION

Issue 13 (a) – Advanced Metering Infrastructure (AMI)

In the Phase 1 Decision, the OEB directed Enbridge Gas to provide an update on its AMI pilot project in Phase 3, in the context of denying Enbridge Gas's request to relax its Meter Reading Performance Measurement standard. The OEB observed that “the Advanced Metering Infrastructure pilot project is a positive step in managing this metric in the future.” In Phase 3 Exhibit 2, Tab 7, Schedule 2, Enbridge Gas confirmed that it is undertaking an AMI Proof of Concept (POC), and stated that “it is anticipated that the POC will be completed in Q4 2025” and that once the POC's preparatory investigations and analysis are complete, Enbridge Gas “will consider all results and findings in developing a plan for large scale AMI implementation in Ontario.”

BOMA Toronto agrees with Enbridge Gas that AMI technology, once deployed, offers significant benefits, including that it will “enable energy management” and “facilitate integrated planning.” Interval consumption data from AMI is a foundational input to effective demand side management (DSM) programming. BOMA Toronto's members, as large-volume commercial customers, have a

direct interest in this benefit specifically: interval data is a foundational input to the kind of building-level energy management, benchmarking, and DSM participation that BOMA Toronto's members already pursue on the electricity side, and that the commercial sector could pursue on the gas side once AMI is available.

BOMA Toronto's concern is not with the AMI POC itself, but with the pace and specificity of Enbridge Gas's reporting on it. The AIC confirms only that Enbridge Gas “is undertaking” the POC and that it will consider the results “once” they are complete; it does not confirm whether the POC's anticipated Q4 2025 completion date was met, what the results showed, or when a sector-specific cost-benefit analysis will be available. The AIC itself is dated more than eight months after the POC's own targeted completion date, yet it provides no update on that milestone.

Enbridge Gas submits in its AIC that it will “continue to provide information to regulatory stakeholders as the Company proceeds with AMI implementation.” through the asset management plan, earnings sharing mechanism applications, and “the upcoming 2029 Rebasing Application.”¹ BOMA Toronto recommends a more defined, near-term reporting commitment as natural gas AMI is a crucial enabler of large-scale, cost-effective DSM.

BOMA Toronto therefore respectfully submits that the OEB should not simply confirm, without qualification, that Enbridge Gas has appropriately responded to the AMI-related direction in the Phase 1 Decision. Rather, BOMA Toronto requests that the OEB direct Enbridge Gas to file, no later than Q2 2027, a dedicated AMI status update addressing: (i) whether the POC has been completed and, if so, its key findings; (ii) the results of the cost-benefit analysis broken out by customer sector and rate class, including the commercial sector; and (iii) if the cost-benefit analysis is positive, a timeline toward a large-scale AMI implementation plan and associated OEB approval process.

Issue 13 (b) – Capital Budget Reduction

BOMA Toronto submits that in general Enbridge Gas has identified and responded appropriately to relevant OEB directions and Enbridge Gas commitments related to capital budget reduction set out in the Phase 1 Decision.

Issue 13 (c) – Integrated Resource Planning

In the Phase 2 Decision, Enbridge Gas agreed to file a report in Phase 3 setting out its response to, and compliance with, the OEB's IRP-related directions. Enbridge Gas's evidence in this proceeding addresses 10 areas, including Pilot Projects, and includes its 2023 and 2024 IRP Annual Reports.²

BOMA Toronto agrees with the OEB's finding in PO. 7, and with Enbridge Gas's position in the AIC, that Issue 13(c) is properly confined to whether Enbridge Gas has identified and responded appropriately to existing OEB directions and commitments, and is not the occasion for a

¹ Page 3 of AIC

² Phase 3 Exhibit 1, Tab 13, Schedule 5

reassessment of the IRP Framework. That broader assessment is, and should remain, the subject of the EB-2025-0125 Framework Review, in which BOMA Toronto has also participated. Given this narrow context, BOMA Toronto submits that in general Enbridge Gas has identified and responded appropriately to all relevant OEB directions and Enbridge Gas commitments related to IRP, set out in the Phase 2 Decision.

BOMA Toronto notes, however, that the AIC's summary of the IRP evidence does not address the substance of BOMA Toronto's interrogatory 1.13-BOMA-1, concerning whether the design of a second IRP pilot has been, or will be, informed by the findings of the AMI POC. BOMA Toronto considers this a natural and practical point of integration: both initiatives are, at their core, about improving Enbridge Gas's visibility into customer-level demand, and a second IRP pilot designed without regard to AMI's potential contribution risks duplicating effort or missing an opportunity to design a more data-driven pilot for the commercial sector.

Given that the linkage between AMI and future IRP pilot design remains an open question that Enbridge Gas has not yet addressed, BOMA Toronto respectfully submits that the OEB should direct Enbridge Gas to specifically address whether and how AMI capabilities and data will inform the design of any further IRP pilot(s) in its updated IRP Framework application (to be filed within the next month, as stated by Enbridge Gas in its AIC).

Finally, BOMA Toronto reiterates the position it advanced in EB-2025-0333, in response to Enbridge Gas's motion to review and vary the OEB's decision on Enbridge Gas's first IRP pilot: that Enbridge Gas's approved IRP pilot activity is already years behind the timeline the OEB originally set in EB-2020-0091, and that the design of a second pilot exploring creative solutions for the commercial sector "should be well underway." BOMA Toronto submits that nothing in the OEB's disposition of Issue 13(c) in this proceeding should be read as sanctioning further delay to that work, and BOMA Toronto will continue to advocate, in the IRP Framework Review and otherwise, for the second pilot to proceed without further delay.

Issue 13 (d) – Written Marketing Materials

BOMA Toronto has no submissions with respect to this issue.