Integrated Resource Planning (IRP)

2025 Annual Report

May 29, 2026

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Section 1 – Introduction

This Enbridge Gas Inc. ("Enbridge Gas" or the "Company") 2025 IRP Annual Report ("Report") encompasses the period from January 1, 2025, through to December 31, 2025.

This Report complies and is consistent with the Ontario Energy Board ("OEB") Integrated Resource Planning ("IRP") Decision and Order dated July 22, 2021 ("IRP Decision") establishing an IRP Framework for Enbridge Gas ("IRP Framework"), where the OEB stated:[1]

> "Enbridge Gas shall file an annual IRP report with the OEB as part of its annual Non-Commodity Deferral Account Clearance and Earnings Sharing Mechanism application, the proceeding in which it may seek disposition of balances in the IRP Costs deferral accounts.
>
> The OEB does not intend to approve the annual IRP report, but it could impact the OEB's findings on the disposition of amounts in the IRP Costs deferral accounts or inform future proceedings.
>
> The annual IRP report and the report from the IRP Technical Working Group ("TWG") are to be filed for information regardless of whether Enbridge Gas is seeking approval to clear any balances in the IRP Costs deferral accounts.
>
> The annual IRP report should include the following information:
>
> - A summary of IRP stakeholdering activities from the past year
> - A summary of IRP engagement or consultation activities with Indigenous peoples
> - Updates on IRP pilot projects underway
> - Updates on incorporating IRP into asset management planning
> - Updates on status of potential IRP Plans
> - Updates on status of approved IRP Plans, including details of adjustments made by Enbridge Gas
> - Annual and cumulative summaries of actual peak demand reductions/energy savings generated by each IRP Plan to-date, including comparisons to the initial forecast reduction/energy savings and the actual amount of expenditure on each IRP Plan to-date
> - The most recent results of Enbridge Gas's IRP Assessment Process for system needs, including reporting on those system needs where a negative binary screening or technical/economic evaluation resulted in no further assessment of Integrated Resource Plan Alternatives ("IRPAs")
> - A summary of best available information on demand-side IRPAs, including types of IRPAs, estimates of cost, peak demand savings, status in Ontario, potential role and relevance to Enbridge Gas's system, and learnings from pilot projects and other jurisdictions
> - Efforts taken to explore the use of interruptible rates for meeting system needs, including how customers have been provided the opportunity to consider this option
> - Any other IRP-related matters established by the OEB."

[1] EB-2020-0091, OEB Decision and Order, Appendix A, p. 22.

Section 2 – IRP Integration Update

Enbridge Gas has integrated IRP cross-functionally by embedding resources within its Asset Management ("AM"), Distribution Optimization Engineering ("DOE"), financial analysis, Customer Policy and Strategy ("CP&S"), regulatory, municipal and stakeholder engagement departments, as well as within the IRP team. These resources directly support the implementation of the IRP Decision, which includes:

- Binary screening and technical evaluations of facility projects in the Asset Management Plan ("AMP") and optimization of the AMP to include IRP Plans;
- Economic analysis of those projects with a technically feasible IRP alternative ("IRPA");
- Support for the technical and economic evaluation of enhanced targeted energy efficiency ("ETEE") and demand response ("DR") IRPAs, as well as for the design, delivery, and ongoing monitoring and evaluation of OEB-approved IRP Plans, including IRP Pilot Projects;
- Development and implementation of regional, geo-targeted and pilot-specific IRP stakeholder engagement activities, as well as an increased level of direct engagement with a number of key IRP stakeholders; and,
- Regulatory support for IRP Plans and for Leave to Construct ("LTC") proceedings.

Enbridge Gas built upon the progress made in 2024 by continuing to enhance cross-functional processes, including the following:

- **Refinement of Technical and Economic Evaluation Process for IRPAs**
  Enbridge Gas continued to develop/refine the technical and economic evaluation process in 2025, including automating data population of the technical evaluation form, evolving the documented list of key inputs and assumptions to be used in the DCF+ model and developing templates to support the economic assessments, which will help to streamline the evaluation process. This included developing templates to be used when evaluating an IRPA's economic feasibility and to improve the process of gathering, consolidating and documenting inputs from various internal departments to support the assessments. This contributed to the streamlined technical evaluation of 77 investments and supported the subsequent economic evaluation of a total of 20 investments in the Enbridge Gas AMP Addendum 2026 filed on October 30, 2025. Further details on the IRP Evaluation are outlined in Section 3.

- **Development/Refinement of ETEE Model**[2]
  Enbridge Gas refined the ETEE model that supports assessment of savings potential and costs associated with the implementation of an ETEE program. This model scales down an Ontario-wide demand-side management ("DSM") forecast to estimate DSM participation in a specific geographic region by considering the region's customer base, prior participation in DSM programs and average consumption. The model subsequently estimates the increased participation, savings and costs associated with an ETEE program in that region, incremental to the regional estimated DSM participation. This incremental ETEE data is incorporated into the DCF+ model as an input. The ETEE model was used to support the economic evaluation of the 16 investments passing the technical evaluation and for which ETEE implementation had the potential to impact project scope.

- **Implementation of IRP Pilot Projects**
  In 2025 Enbridge Gas completed the hiring for the incremental resources required to lead the design, execution and evaluation of the Southern Lake Huron Pilot Project approved by the OEB in March 2025 (EB-2022-0335). A dedicated team of four was established within the IRP department, and incremental

[2] At TWG Meeting #56 on June 25, 2025, Enbridge Gas provided a walkthrough of the ETEE model, including the key assumptions considered in the model (link – slide 30). Enbridge Gas also provided a follow-up in TWG Meeting #59 to confirm the consistency of the forecasting approach, basis of the peak to annual savings factor, and how diversification of load is considered (link).

resources were embedded within the DOE and Marketing and Customer Insights departments to execute on the Pilot Project requirements. Additionally, a resource was hired to lead the requirements for the System Pruning Pilot Project which has proceeded in accordance with the Rebasing Phase 2 Settlement Agreement (EB-2024-0111). This resource works cross-functionally across departments to execute on the requirements for the System Pruning Pilot.

Section 3 – IRPA Evaluation and AMP Update

The AMP Addendum 2026 from 2025 to 2034 was filed on October 30, 2025.[3]

Investment project scopes in the capital plan are determined through Enbridge Gas's system analysis and optimization of all traditional facility alternatives to meet the forecasted system need in the most cost-effective manner to ensure the safety, reliability and affordability of the Company's operations.

As described in the AMP, Enbridge Gas follows the Asset Investment Planning & Management ("AIPM") process to initiate the IRP assessment process of investments within the capital plan. The status of the IRP assessment for investments is provided in Appendix B of the AMP.

The IRP assessment process is detailed below:

1. **Initial Screening**
   Non-gas-carrying asset investments are screened out from the list of 2025-2034 AMP investments that would proceed to the binary screening phase.

2. **Binary Screening**
   Investments are screened out as per Section 5.2 of the IRP Framework. Investments under the Asset Class of Customer Connections are also screened out at Binary Screening stage.

3. **Technical Screening & Evaluation**
   Investments undergo an initial technical screening to determine whether a detailed technical evaluation is required.

   Investments that have passed technical screening will be evaluated for whether an investment could have a technically feasible IRPA(s). To assess the technical potential of IRPAs to meet a system need, Enbridge Gas calculates the required demand reduction and/or incremental supply by determining the difference between the required and current system capacity. Where IRPAs have the technical potential to defer, reduce or offset the required capacity through either a reduction in the design hour/day demand or incremental supply within the required timeframe, and without compromising the safety and reliability of the system, these investments pass the technical evaluation.

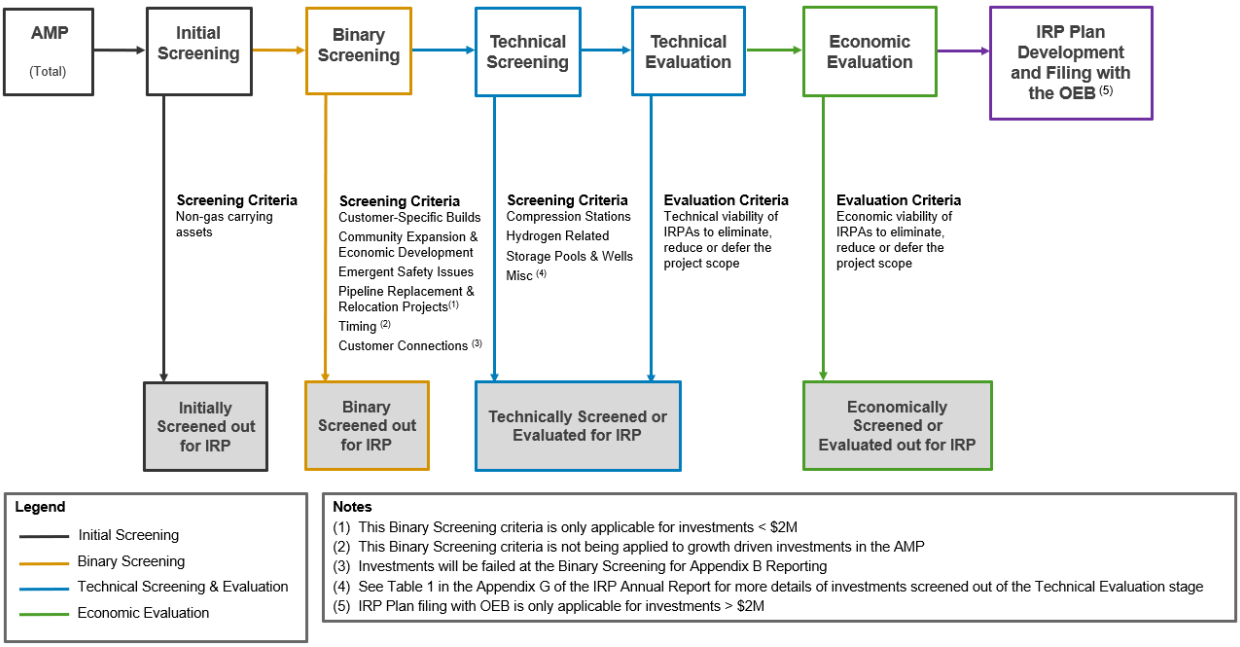
4. **Economic Evaluation**
   Investments that have passed technical evaluation are economically evaluated using the DCF+ test. The DCF+ test compares each technically feasible IRPA and the identified baseline facility project to a 'do nothing' scenario. The DCF+ results for the IRPAs and the baseline facility alternative are then compared to one another to determine the optimal alternative or combination of alternatives to meet the system need. If it is determined that the most optimal option includes one or more IRPAs, an IRP Plan will be developed where applicable.

   See Section 9 for updates on the DCF+ test used for economic evaluations. See Section 6 for Non–Pilot IRP Plan Updates.

[3] EB-2020-0091, Enbridge Gas AMP Addendum 2026, October 30, 2025 (link)

Further details on the IRP assessment screening and evaluation process can be found in Appendix F. The current IRP screening and evaluation process is outlined in Figure 3.1.

Figure 3.1 – IRP Assessment Process



2025 IRP Assessment Update

Enbridge Gas continually evolves its system models to improve the modelling methodology. This includes gathering and considering newly available and relevant information, data, and insights. This ensures that Enbridge Gas' system models reflect the best available information regarding Ontario's projected future demand for natural gas.

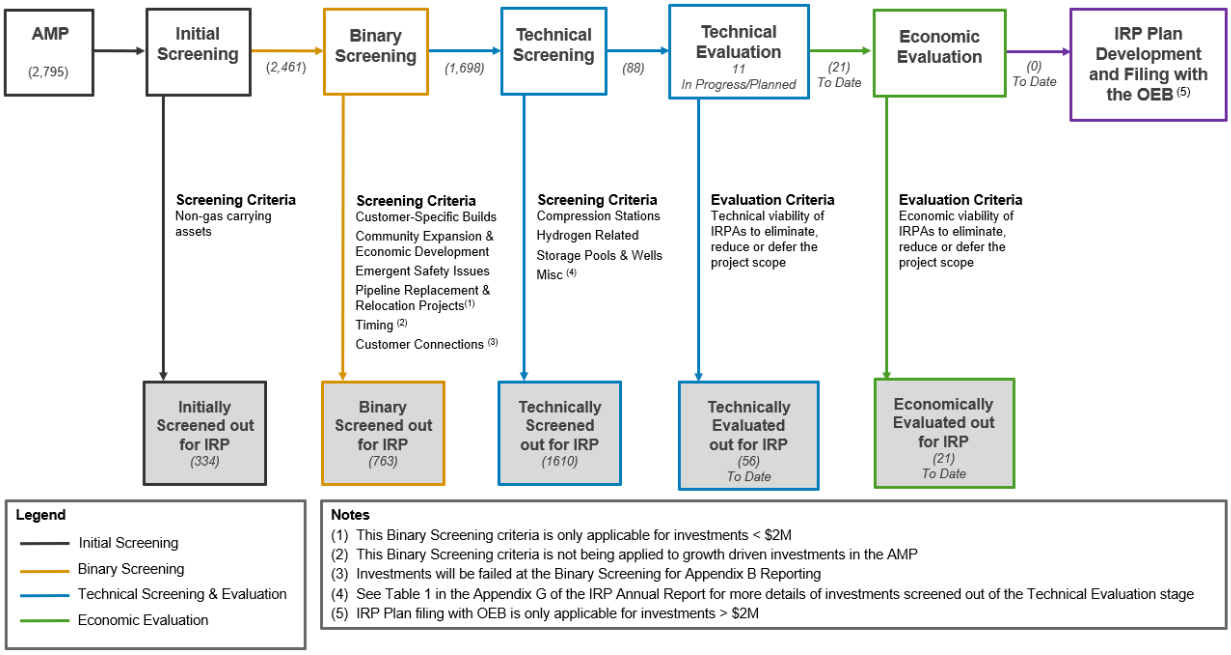
The 10-year forecast for the 2025-2034 AMP Appendix B incorporates the following key factors:

1. System Reinforcement Plan ("SRP") Update
    - A refresh to the SRP was completed in Q1 2025. The process included an update to the customer connection forecast, updates to customer load, new connections and new proposals with actuals, and updated customer load values for new customers.

2. Energy Policy and Market ("EP&M") Adjustments
    - As summarized in Enbridge Gas's 2024 Rebasing Application (EB-2022-0200), Enbridge Gas introduced adjustments to its demand forecasts (for existing customers, customer additions and average annual use) and design elements (design hour and design day) to account for potential changes to natural gas demand in the 10-year forecast period. These demand forecasts and design elements are routinely used in various business planning processes such as the SRP, AMP, Gas Supply Plan, etc. The adjustments are based on external factors related to policy signals (federal/provincial/municipal), market trends (builder and consumer preferences) and stakeholder feedback (customer, municipal and Indigenous). Annually Enbridge Gas will review and update, as needed, the adjustments to account for new and/or updated external signals and/or development.

A summary of the number of investments at each stage of the IRP screening and evaluation process is outlined in Figure 3.2

Figure 3.2 – Overview of IRP Evaluation Results – 2025-2034 AMP



In 2025, Enbridge Gas completed the IRP screening and evaluation of all investments in the AMP that had a defined scope. A summary of the IRP screening and evaluation process on the 2,795 investments in the AMP Addendum 2026 is provided below:

- 334 investments were screened out using initial screening.
- 763 investments were screened out using binary screening.
- 1610 investments were screened out using technical screening.
- 77 investments underwent a complete technical evaluation, including all investments under the Asset Class of Growth and Distribution Pipe.
    - 56 investments did not pass technical evaluation.
    - 21 investments passed technical evaluation.
- 11 investments remain to undergo technical evaluation or have the evaluation currently in progress as of the time of filing.
    - 5 investments under the Asset Class of Transmission Pipe & Underground Storage have an IRP evaluation status of “In-Progress”. Due to the broad scope and scale of these investments, supply-side alternatives have a significant potential for technical feasibility but are inherently responsive to market conditions, and therefore, will be assessed closer to the forecasted in-service date. The assessment of demand-side alternatives is currently in progress. The corresponding IRP evaluation and results will be included in either an LTC application or IRP Plan.
    - 3 investments in the EDIMP have a technical evaluation status of “In Progress” and are awaiting further integrity assessment to confirm project scope and timing. The IRP evaluation will proceed once project scope and timing has been established. Based on the status of the integrity assessments, Enbridge Gas anticipates IRP evaluation will be conducted later in 2026.
    - 3 Investments under the Asset Class of Growth have an IRP evaluation stage of “In Progress” and are currently being rescoped. IRP evaluation will resume once the revised scope is confirmed.

- 21 investments passed the technical evaluation, where 20 have undergone an economic evaluation. There is 1 investment under the Asset Class of Growth for the IRP pilot project that is not applicable for economic evaluation.
    - 20 investments failed economic evaluation for an IRPA to be an optimal alternative.
        - 4 investments under the Asset Class of Growth with an in-service date ("ISD") of 2025 or 2026. The facility alternative has been identified as the optimal solution and will be implemented accordingly.
        - 10 investments under the Asset Class of Growth with an ISD of 2028 and beyond. The facility alternative has been identified as the optimal solution, and the project scope will be monitored. Annual review of the facility and IRP alternatives will be conducted to confirm the optimal solution prior to alternative implementation. Contract customer engagement within the area of benefit, where applicable, will be conducted closer to the forecasted ISD.
        - 6 investments under the Asset Class of Distribution Pipe with an ISD of 2028 and beyond. The facility alternative has been identified as the optimal solution, and the project scope will be monitored. Annual review of the facility and IRP alternatives will be conducted to confirm the optimal solution prior to alternative implementation. Contract customer engagement within the area of benefit, where applicable, will be conducted closer to the forecasted ISD.

Enbridge Gas has provided a high-level breakdown of the investments screened or evaluated out of the AMP Addendum 2026 for IRP including the associated 2025-2034 Forecast in Appendix C.

Section 4 – IRP Pilot Project Update

Southern Lake Huron Pilot Project

On March 27, 2025, the OEB issued its Decision and Order approving the Southern Lake Huron ("SLH") Pilot Project scope, contents, costs, and proposed accounting treatment of costs as filed by Enbridge Gas, subject to the various changes as detailed in the Decision and Order ("Pilot Decision").[4] The key changes in the Pilot Decision related to the delivery of the SLH Pilot Project are to:

- Reject funding for advanced gas technologies, namely hybrid heating, natural gas heat pumps and natural gas thermal energy storage. Recognizing that thermal energy storage can utilize electricity, the pilot funding was approved for thermal energy storage, on the condition that it utilizes electricity and does not require or incent the customer to install, modify, or upgrade gas-fired space heating or water heating equipment.
- Reallocate the funding for the denied advanced gas technologies (hybrid heating and gas heat pumps) to the budget for Limited Electrification Measures. Enbridge Gas was directed to increase the number of participants for its electrification offerings.
- Collect and include in the pilot's Evaluation, Measurement & Verification ("EM&V") plans the weather normalized gas consumption data from the estimated 320 customers that have Encoder Receiver Transmitter ("ERT") technology and cold climate air source heat pumps ("ccASHP") and compare this to their weather normalized gas consumption before the heat pumps were installed, to the extent that the data is available. Enbridge Gas was also directed to include the weather normalized consumption data from a representative sample of those customers in the SLH Pilot Project study area with the ERT technology who have not installed heat pumps.

On the same date, the OEB issued a Notice of Review on the OEB's own motion (EB-2025-0124), initiating a proceeding to review the Pilot Decision in respect of three questions relating to the findings on electricity IRPAs and the exclusion of funding for gas-fired technologies.

On April 15, 2025, Enbridge Gas filed a letter to the OEB to request clarification and expansion of the scope of the pending Review Motion. This letter outlined that Enbridge Gas does not believe that it is appropriate to proceed with the aspects of the proposal that are subject to the OEB's Review Motion. The letter requested that the OEB indicate that the following aspects of the Pilot Decision are stayed or suspended pending the outcome of the Review Motion: the direction to reallocate the IRP Pilot budget related to natural gas-based technologies to the expansion of electric solutions, any aspect of the Pilot Decision that purports to amend the IRP Framework and/or DSM Framework, the direction to analyze and develop potential additional IRP pilot projects, and the direction to consult with the IRP TWG on such potential opportunities.

On April 22, 2025, in response to a letter submitted by Pollution Probe, Enbridge Gas filed a letter confirming the Company was proceeding with the implementation of the IRP Pilot Project including the electrification measures at the limited participation levels proposed by Enbridge Gas in the Pilot Application. The stay request that specifically relates to the IRP Pilot Project is only in relation to the direction in the Pilot Decision to redirect funds relating to advanced natural gas technologies to electrification IRPAs as that item is clearly at issue in the Review Motion. Furthermore, Enbridge Gas confirmed that it will not include any advanced natural gas technology IRPAs (including thermal energy storage) without further direction from the OEB.

On July 4, 2025, Enbridge Gas filed its 2024 IRP Annual Report.[5] Within it, Enbridge Gas fulfilled the direction in the Pilot Decision to include a detailed Pilot project plan. The SLH Pilot Program Design and Implementation Plan ("SLH

[4] As per the OEB Decision on the IRP Pilot Project, Enbridge Gas engaged with the IRP Technical Working Group ("TWG") to file an updated detailed project plan and estimated unit rate, and bill impact associated with the forecast 2025 pilot costs for typical customers by rate class in the 2024 IRP Annual Report. See EB-2025-0155, 2024 Utility Earnings and Disposition of Deferral & Variance Account, Exhibit G, Tab 2, Schedule 1

[5] EB-2025-0064 Exhibit I.1.13-ED-4 Attachment 1

project plan") included all approved offers (ETEE offers, Limited Electrification offer, Demand Response offer) but not the Advanced Gas Technology offer at issue in the Review Motion. As directed, Enbridge Gas engaged with the IRP TWG to develop the SLH project plan and update it on a rolling basis.

On December 11, 2025, the OEB issued a decision indicating that it will not proceed on its own Review Motion as it did not consider the review to result in the most just, expeditious and efficient determination of the matters before the OEB. The OEB noted that the questions raised are best considered in the context of a broader review of IRP policies but acknowledged that its conclusion does not necessarily extend to a different review motion filed by a different party.

On December 22, 2025, Enbridge Gas filed its own Notice of Motion to Review (EB-2025-0333) requesting the following variation of the Pilot Decision:

- Approve the inclusion of advanced gas technologies in the SLH IRP Pilot Project;
- Remove the direction to re-allocate the budget for the denied advanced gas technologies to electrification measures;
- Remove or correct the broader statements in the Pilot Decision supporting the determination not to approve initiatives that would result in the adoption of gas fired appliances and continue the use of natural gas; and,
- Remove the direction to consult with the IRP TWG on a second IRP pilot project on specified proposed measures, pending further direction from the current and ongoing EB-2025-0125 IRP Framework Review.

On May 14, 2026, the OEB issued its Decision on the Motion to Review.[6] The OEB did not vary its original Decision to reject incentives for advanced gas technologies in the SLH Pilot Project. However, the OEB clarified that this component of the Decision is specific to the SLH Pilot Project. The role of gas technologies as IRP alternatives in IRP is a matter that can be addressed in the broader IRP Framework Review and the OEB does not consider the Decision in the SLH Pilot Project to have predetermined or prejudged the outcome of that proceeding. The OEB did vary the original Decision by not requiring reallocation of the $1.5 million advanced gas technologies budget to electrification measures. The Decision also found that it does not consider it efficient or cost-effective to have Enbridge Gas and TWG members begin discussions on a second pilot project in parallel with the IRP Framework Review. Matters related to a second IRP pilot project and any further IRP pilot projects will be addressed as part of the IRP Framework Review.

SLH Pilot Program Design and Implementation Updates

Enbridge Gas launched the SLH Pilot offers as described in the SLH project plan under the name "Sarnia Saves" on the following dates:

- July 31, 2025. Commercial and Industrial Custom Offer[7]
- September 22, 2025. Residential Whole Home Offer[8]
- September 22, 2025. Residential Single Measure Attic Insulation Offer
- September 22, 2025. Residential Limited Electrification Offer
- October 8, 2025. Commercial and Industrial Direct Install Offer
- October 8, 2025. Commercial and Industrial Prescriptive Downstream Offer
- February 20, 2026. Residential Demand Response Offer

The OEB's Pilot Decision states that the detailed SLH project plan should be updated on a rolling basis. The following section identifies the changes made to the design, delivery, marketing, stakeholdering, and EM&V efforts relative to

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[6] EB-2022-0333, OEB Decision and Order, May 14, 2026.
[7] The Sarnia Saves website for all SLH IRP Pilot commercial offers is accessible at www.enbridgegas.com/sarniasaves/business
[8] The Sarnia Saves website for all SLH IRP Pilot residential offers is accessible at www.enbridgegas.com/sarniasaves

the sections of the SLH project plan filed in the 2024 IRP Annual Report as Appendix H.[9] All other elements of the SLH project plan remain unchanged.

i. SLH Project Plan pilot area update

Section of Plan	As filed	Change	Justification
Overview (2024 IRP Annual Report, Appendix H, pp. 241)	• City of Sarnia and Village of Point Edward (N7S, N7T, N7V, N7W, N7X) • Brights Grove (N0N 1C0)	The pilot area was clarified by adding highway boundaries • City of Sarnia and Village of Point Edward (postal codes starting with N7S, N7T, N7V, N7W, N7X) that are north of Highway 25 and west of Highway 26 and Brights Grove (N0N 1C0)	Ensures consistency with the pilot area in the Pilot Project application.

ii. SLH Project Plan Offer updates

Commercial, Industrial Direct Install and Prescriptive Offers

Section of Plan	As filed	Change	Justification
Table 4 – SLH Pilot Direct Install Incentive Structure by Measure (2024 IRP Annual Report, Appendix H, pp. 247) Table 7 – SLH Pilot Prescriptive Downstream Incentive Structure by Measure (2024 IRP Annual Report, Appendix H, pp. 252)	Each measure has a unique maximum equipment and installation incentive.	Measures are no longer subject to specific equipment and installation incentive maximums. Measures are eligible to receive 100% of relevant project costs (equipment and installation), up to $100,000 per project.	This change was made to simplify the “free upgrade” messaging and promote the installation of larger more complex projects.
Commercial Direct Install offer – Delivery Approach (2024 IRP Annual Report, Appendix H, pp. 248)	The delivery agent will recruit and onboard local trade allies, coordinate outreach efforts, identify opportunities, connect customers with these trade allies, and provide support throughout the process from engagement to equipment installation.	The delivery agent will continue with these activities, but Enbridge Gas has expanded the recruitment of trade allies by leveraging its existing DSM trade ally relationships.	Expanding recruitment efforts has helped onboard more trade allies faster and facilitated the generation of more project leads.

[9] EB-2025-0064 Exhibit I.1.13-ED-4 Attachment 1

Commercial and Industrial Custom Offer

There were no changes to the IRP Pilot Commercial and Industrial custom offer's design, delivery or incentive structure outlined in the SLH project plan.

Residential Whole Home Offer

Section of Plan	As filed	Change	Justification
Table 13 – SLH Pilot Residential Whole Home Incentive Structure by Measure (2024 IRP Annual Report, Appendix H, pp. 263)	Incentive offered for Windows/Doors/Skylights/Sliding Doors is $50 per rough opening	Incentive offered for Windows/ Doors/ Skylights/ Sliding Doors was updated to $100 per rough opening	As noted in the SLH project plan, Pilot incentive amounts will be updated to remain consistent with the in-field DSM offer.

Residential Single Measure Attic Insulation Offer

There were no changes to the IRP Pilot Residential Single Measure Attic Insulation Offer's design, delivery or incentive structure outlined in the SLH project plan.

Residential Limited Electrification Offer

Section of Plan	As filed	Change	Justification
Table 19 – Key Features of the SLH Pilot Electrification Offer (2024 IRP Annual Report, Appendix H, pp. 270)	Offer requires customers to fully switch from natural gas space heating to electricity after the heat pump installation without any back up natural gas space heating options. Participants do not need to disconnect their natural gas service.	An exception to this eligibility criteria was made that allows participants to keep natural gas fireplaces.	This exception was made after consultation with the TWG.[10] Enbridge Gas and the TWG member who raised this exception agreed that even if a natural gas fireplace is kept, most peak demand reduction benefits would likely still be achieved.
Table 19 – Key Features of the SLH Pilot Electrification Offer (2024 IRP Annual Report, Appendix H, pp. 270)	N/A	A new participation restriction was added. If a customer receives an incentive for an electric cold climate air source heat pump ("ccASHP") or electric ground source heat pump ("GSHP") through the SLH Pilot Electrification Offer,	This new participation restriction was added after consultation with the TWG.[11] TWG members agreed that if a participant were to get a heat pump, it would be counterintuitive for Enbridge Gas to also pay for the participant's building envelope improvements

[10] IRP TWG Meeting Notes, Meeting #55, (link)
[11] IRP TWG Meeting Notes, Meeting #60, (link), IRP TWG Meeting Notes, Meeting #55, (link)

		they cannot also participate in the SLH Pilot Residential Whole Home or SLH Pilot Residential Single Measure offer	because there is no added gas peak load reduction. Enbridge Gas agreed and added this new restriction.

Residential Demand Response Offer

Section of Plan	As filed	Change	Justification
Incentive Structure (2024 IRP Annual Report, Appendix H, pp. 274)	"Bonus" Participation Incentive: For each heating season that participants remain enrolled in the program and meet eligibility requirements, participants will enter a draw for a chance to win $2000.	The "bonus" participation incentive was reframed as an annual participation incentive. It was also changed to be a $20 annual incentive rather than a chance to win $2000.	Enbridge Gas's Demand Response delivery agent recommended the shift in incentive to $20 offered to all participants to align with incentive best practices. The incentive level was set to align with the IESO Peak Perks incentive for simplicity for the market.
Incentive Structure (2024 IRP Annual Report, Appendix H, pp. 274)	"Bonus" Participation Incentive eligibility requirements include participation in at least 50% of DR event hours each heating season.	For the 2025/2026 heating season, participants will get $20 if they enroll in the program by March 30, 2026. There is no requirement to participate in at least 50% of DR event hours for that heating season. The requirement to participate in at least 50% of DR event hours to receive the $20 incentive remains in effect for the 2026/2027 heating season.	The 50% participation requirement was removed for the 2025/2026 heating season to simplify and maximize first time signups into this new Enbridge Gas offer.

iii. SLH Project Plan Marketing Updates

Residential Marketing Tactics Updates (2024 IRP Annual Report, Appendix H, pp. 275)

Tactic	Objectives	Description	Status
Residential ETEE offers – Pre-launch			
SLH pilot residential webpage	Awareness and method of applying to residential offers	The webpage acts as a hub for SLH pilot residential offers. All residential marketing tactics drive customers here to learn more about the offers and sign up.	Completed September 8th, 2025
Community photo and video shoot	Awareness	A custom image and video shoot captured local community footage and reaction to pilot design features.	Launched on September 16, 2025, to December 30, 2026. Active on YouTube and program landing page.

Residential ETEE offers – Post-launch			
Customer-facing brochures for all ETEE pilot residential offers	Awareness	The customer-facing brochure highlights all pilot residential offers and outlines incentive amounts, pilot features, and specific calls to action.	Completed October 8, 2025
Direct Mail focusing on launch of ETEE pilot residential offers	Awareness and collection of engagement data	Direct mail was sent to approximately 25,000 residential customers to introduce the pilot residential offers, and outline incentive amounts, pilot features and specific call to action.	Completed October 15, 2025
Direct mail — follow-up postcard	Awareness and collection of engagement data	The postcard was meant to reinforce the direct mail campaign	The postcard was not needed. The intent of the postcard was to boost early leads into the residential pilot offers. Early marketing generated a large number of leads into the residential pilot offers. To prevent a backup of processing customers into the pilot, the postcard was not sent.
Eblasts (x3) promoting pilot ETEE residential offers	Awareness and collection of engagement data	Targeted emails promoted all pilot residential offers.	An eblast was sent to residential customers in the pilot project area on September 25, 2025, with a follow-up on October 2, 2025. Early marketing generated a large number of leads into the residential pilot offers. To prevent a backup of processing customers into the pilot, a third eblast was not sent in 2025.
Google Search	Awareness and collection of engagement data	The Google search campaign promoted the pilot offers to Google users searching for energy rebate information.	Launched September 23, 2025, to March 9, 2026
Digital campaign (Summer and Fall)	Awareness and collection of engagement data	Digital marketing tactics were implemented to target the local population, utilizing platforms such as Google and Meta.	Launched from September 21 to December 1, 2025.
Radio	Awareness	Two 30 second spots were run for approximately 5 weeks to promote the residential offers.	Launched from September 22 to November 15, 2025.

Out of home (OOH) marketing campaign	Awareness	Geo-targeted marketing targeted commuters, drivers and walking traffic. Tactics included transit shelters, bus advertisements, and digital screens.	Launched from September 22 to November 15, 2025.
Print ads	Awareness	Local newspaper advertisement was meant to promote pilot offers.	Early marketing generated a large number of leads into the residential pilot offers. To prevent a backup of processing customers into the pilot, print ads were not run in 2025.
Events	Awareness	Events will be attended by Enbridge Gas staff or pilot delivery agents to promote the offers, and distribute printed marketing material.	The pilot will have a presence at the 2026 Sarnia Home Show on April 10, 2026. Enbridge Gas continues to explore other events to promote the residential pilot offers.
Scam awareness eblast	Awareness	An email awareness campaign was sent to residential customers in the pilot area warning against unauthorized and illegitimate third parties posing as Sarnia Saves.	Completed February 4, 2026
Residential Demand Response			
Demand Response webpage[12]	Awareness, collection of engagement data and directing customers to the third-party microsite	The webpage promotes the Demand Response offer and directs customers to the third-party microsite	Completed February 20, 2026
Demand Response third-party microsite[13]	Awareness, collection of engagement data and enrollment process	The third-party microsite is run by the Demand Response delivery agent EnergyHUB. It is required to manage enrollment, incentive payments and Demand Response events	Completed February 20, 2026
Eblast promoting Demand Response	Awareness and collection of engagement data	Targeted emails promoting the Demand Response offer.	Completed February 27, 2026
Google search campaign	Awareness and collection of engagement data	The Google Search campaign will run for 17 weeks, maintaining sustained visibility among customers actively searching for smart	Starting February 27, 2026

[12] https://www.enbridgegas.com/ontario/sarnia-saves/smart-rewards/
[13] https://greatergrid.com/enroll/programs/thermostats/enbridge-gas/

		thermostat–related offers and incentives	
Digital marketing campaign	Awareness and collection of engagement data	Demand Generation and Meta campaigns will run for 10 weeks, leveraging audience targeting to reach eligible customers in the pilot region and reinforce awareness	Starting February 27, 2026
Direct in-app promotion to smart thermostats in the pilot region	Awareness and directing customers to the third-party microsite	Device Partners (Amazon, Google Nest, Honeywell, Ecobee etc.) will promote Demand Response to customers in pilot area with a Partner-brand smart thermostat.	Late February and early March 2026
Device Partner eblasts	Awareness and directing customers to the third-party microsite	Device partners will send an email to promote Demand Response to customers in pilot area with a Partner-brand smart thermostat.	Late February and early March 2026

Commercial Marketing Tactics Updates (2024 IRP Annual Report, Appendix H, pp. 277 and pp. 279)

The original plan presented Small Business ("SMB") and Commercial/Industrial ("CI") customers as distinct segments. This was revised by combining marketing to these groups. Combined marketing simplified the approach to market and customer participation, and made it easier to communicate a complete picture of all pilot commercial offers.

Segmentation remained where it helped target messaging to specific audiences. This included having separate direct mail material for restaurants and general commercial customers, and separate LinkedIn campaigns for small and large commercial customers.

Commercial Marketing Tactics

Tactic	Objectives	Description	Status
Commercial offers – Pre-launch			
SLH pilot commercial webpage	Awareness and method of applying into commercial offers	The webpage acts as a hub for SLH pilot commercial offers. All commercial marketing tactics drive customers here to learn more about the offers and sign up.	Completed on September 8, 2025
Community photo and video shoot	Awareness	A custom image and video shoot captured local community footage for use in marketing material.	Completed September 16, 2025
Customer-facing brochures and Sales sell-	Awareness	The customer-facing brochure and sell sheet highlight all pilot commercial offers and outline	Completed on September 8, 2025

sheet for all pilot commercial offers		incentive amounts, pilot features, and specific call to action.	
Commercial offers – Post-launch			
Direct Mail focusing on launch of pilot commercial offers	Awareness	Direct mail was sent to promote the commercial pilot offers. Two versions were prepared – one for restaurant and food services with Demand Control Kitchen Ventilation (DCKV) information, and another for general businesses.	Completed October 15, 2025
LinkedIn Digital campaign	Awareness and collecting engagement data	LinkedIn campaign targeted professionals and businesses interested in rebates, energy efficiency, and sustainability.	Launched October 10 to December 3, 2025
Events	Awareness	Events will be attended by Enbridge Gas staff or pilot delivery agents to promote the offers, and distribute printed marketing material.	Enbridge Gas participated in two events to present attendees with the details of the commercial pilot offers: • Sarnia-Lambton Leadership Legacy Summit (Oct 22, 2025) • Sarnia Lambton Chamber of Commerce Business Showcase (Nov 19, 2025)
Eblasts x 2	Awareness and collecting engagement data	Targeted emails promoted all pilot commercial offers.	Completed on October 8 and December 4, 2025

iv. SLH Project Plan Stakeholder Engagement Activities – progress on engagement items listed in the filed plan (2024 IRP Annual Report, Appendix H, pp. 280)

Engagement items	Objectives	Description	Status
Pre-launch			
Detailed stakeholder lists	Coordination, Awareness	Develop detailed stakeholder contact lists for Tier 1-3 entities[14]	Complete
Briefing collateral	Awareness	Build briefing material toolkit for Tier 1, 2 priority audiences	Complete
External communications collateral	Awareness	Develop communications collateral to be used by Tier 1, 2 priority audiences across their community-facing channels to support broad public awareness	Complete
Advance notifications of Pilot launch to select stakeholders	Engagement; Awareness	Notify key municipal (elected and staff-side), Indigenous, MPP/MP constituency stakeholders about the Pilot; provide campaign overview	Complete
Launch			
Conduct priority stakeholder briefings	Awareness, information sharing	Tier 1, 2 priority briefings to occur (in advance of launch of marketing campaign where possible); capture feedback	Complete
Pilot launch event	Awareness	Execute a launch event with local-area stakeholders (supported by media materials)	Rather than a launch event, Enbridge Gas executed individual briefings with stakeholders in advance of marketing launch and leveraged individual/ organizational awareness channels. Enbridge Gas also participated in two post-launch events to present attendees with the details of the pilot offers: • Sarnia-Lambton Leadership Legacy Summit (Oct 22, 2025) • Sarnia Lambton Chamber of Commerce Business Showcase (Nov 19, 2025)

[14] Tier 1-3 reflects the mapping of stakeholders outlined in the Stakeholder Mapping section of the filed Pilot delivery Plan. Stakeholder groups are prioritized into three tiers based on their ability to influence the uptake and outcome of the Pilot.

Sustained engagement	Awareness	Tier 3 briefings to generate interest, awareness, information sharing across channels; capture feedback	Complete
Channel amplification	Awareness	Encourage Tier 1-3 stakeholders to promote the Pilot through organic owned/ earned channels (e.g. social, newsletters, e-blasts) Create additional lift around milestone activities (e.g. back to school planning)	Residential and Commercial ETEE offers were promoted in local groups including: • Online article in Living in Lambton • Village of Point Edward CiviKit • Bluewater Power Energy Conservation site • Sarnia Lambton Economic Partnership emails and Facebook promotion
Visibility with Tier 3 community	Awareness	Work with local business associations, chambers, identify speaking opportunities to address members and leverage respective engagement channels	Complete, inclusive of the two post-launch events noted above. Ongoing for 2026
Additional (Fall) media push	Awareness; uptake	Drive seasonal messaging through media and public-facing channels; leverage case studies, testimonials	Complete, inclusive of channel amplification examples above. Ongoing for 2026
Post-launch			
Sustainment activities	Awareness, information sharing	Ongoing touchpoints with the municipality, and Tier 1-3 stakeholders to ensure they remain engaged around the Pilot's progress, issues, and next steps. This phase will be supplemented by additional media activations to support marketing/ consumer-facing activities.	Ongoing
Webinars	Awareness, information sharing	The SLH pilot offers were presented as part of four regional IRP webinars delivered by Enbridge Gas	Completed December 2025 and January 2026

v. SLH Project Plan Objective 1 EM&V Plan and Activities (2024 IRP Annual Report, Appendix H, pp. 287)

Enbridge Gas hired Dunsky Energy + Climate Advisors ("Dunsky") through an RFQ process to evaluate the peak hour demand changes for Objective 1. The IRP TWG was engaged for their input on the plan, and it was finalized in Q1 2026. The objectives, methodology, and evaluation timelines are summarized below from the EM&V plan. See Appendix G for the detailed plan.

Evaluation Objectives

The evaluation focuses on enabling Enbridge Gas to develop a clear understanding of how ETEE and DR programs impact system peak hour demand.[15] Specifically, the evaluation will:

- Quantify actual peak-hour flow reductions (m^3/h) from ETEE and DR by comparing pre- and post-program load by customer type.
- Assess DR event performance, including the reliability, magnitude, and persistence of customer response.
- Identify factors that influence achieved impacts (weather, building characteristics, measure types).
- Extrapolate observed impacts to design-hour conditions using Enbridge Gas's regression methods.

These findings will support future IRP Plans by improving assumptions, refining modeling techniques, and informing the feasibility of using demand-side IRPAs in lieu of traditional system reinforcement projects.

Evaluation Methodology

The evaluation applies a set of coordinated analytical approaches to estimate program impacts.

- Load-vs-temperature regression to measure normalized pre/post load changes and validate Enbridge Gas's regression approach.
- Participant vs non-participant comparisons using hourly interval meter data.
- DR event analysis using smart thermostat telemetry matched to consumption records.
- Impact disaggregation by customer type and measure where statistically reliable.
- Load curve analysis to examine peak shifting, rebound effects, and system-level peak relief.

As part of this approach, customer demand extrapolation will be led by Enbridge Gas, with Dunsky providing methodological review and collaboration. This collaborative approach enables the evaluation to leverage Enbridge Gas's expertise in system design, demand profiling, and historic Ontario design-day practice, while also incorporating Dunsky's experience in DR, regression-based load modeling, and large dataset evaluation.

All analyses will incorporate rigorous data validation and transparency regarding uncertainty levels, underlying assumptions, and extrapolation techniques. The evaluation relies on hourly meter data, weather data (temperature, wind), smart thermostat event records, and program tracking datasets.

[15] The baseline used to estimate system impacts is pre-ETEE hourly consumption data, which is analyzed using regression methods and compared against post-intervention conditions. This approach is described in the EM&V report (Section 7.6.3).

vi. SLH Project Plan Objective 2 EM&V Plan and Activities (2024 IRP Annual Report, Appendix H, pp. 290)

The timing of Pilot Objective 2 activities was shifted to align with pilot offer launch dates. In some cases, the cadence of activities was also changed as described in the table below. The approach to Objective 2 activities is consistent with the filed plan.

Updated timeline and cadence of Objective 2 evaluation plan activities (2024 IRP Annual Report, Appendix H, pp. 300 and pp. 314)

Activity	Cadence	Fieldings To-Date	Next Fielding	Notes
Evaluation plan	Complete – Filed in Pilot project plan			
Program & peer research	Once	Nov 2025	Q1 2026	A jurisdictional scan of North American DR programs was completed in November 2025.
Enbridge staff interviews	Quarterly	July 2025; Jan 2026	April 2026	
Res/Com Delivery Agent interviews	Quarterly	Dec 2025	Feb 2026	Surveys were upgraded to interviews to get better details on delivery agent responses
Res/Com Contractor & Energy Advisor interviews	Quarterly	Jan 2026	April 2026	Surveys were upgraded to interviews to get better details on contractor responses. Residential Energy Advisors interviews were added.
Broad-based Residential/ Commercial Surveys	Annually	Sept 2025	Fall 2026	The DSM broad-based participant surveys were expanded to include non-participants. Cadence was updated from quarterly to annual. Annual cadence avoids over-surveying the customer base and is sufficient to gather baseline data
ETEE Pilot Participant Interviews	Quarterly	Jan/Feb 2026	April 2026	Timing for participant interviews shifted to ensure there was enough participation in the Pilot from which to pull a sample
ETEE Participant Surveys	Quarterly	NA	Q2 2026	Timing for participant surveys shifted to ensure there was enough participation in the Pilot from which to pull a sample
DR Participant Surveys	Twice	NA	Q2 2026	
ETEE Near-Participant Surveys	Twice	NA	Q2 2026	Cadence was updated from quarterly to twice. This cadence is sufficient to gather the data needed
DR Opt-Out Surveys	Twice	NA	Q2 2026	
ETEE/DR Non-Participant Surveys	Once	NA	Q1 2027	The cadence has shifted from twice to once. Non-participation in pilot offers can only be confirmed after the pilot has ended.
Cost Analysis	Twice	NA	Q2 2026	
Quarterly memos	Quarterly	Nov 2025	Q1 2026	
Interim report	Once	NA	Q2 2026	
Final report	Once	NA	Q4 2027	The timing has shifted to allow for sufficient time to explore DR events that end Q1 2027

System Pruning Pilot Project

In the Rebasing Phase 1 Decision, the OEB provided the following commentary on IRP alternatives to address potential stranded asset risk relating to system renewal activities through the consideration of system pruning;

> "System pruning, for example, converting a subdivision from natural gas to electricity for space and water heating, is another option. Under this option, existing gas customers would replace their gas equipment with electric equipment. This could be supported by an IRP solution, which would consider various alternatives to avoid the need to replace the facilities. The IRP process could offer alternatives through pilot projects for the OEB to consider, including incentives to be paid to the customers to defray the cost of replacing their gas equipment, or investment by the utility to cover the cost of the electric equipment to be recovered over time, with a return on that investment."[16]

In the Company's submission for Phase 2 of its 2024 Rebasing Application, Enbridge Gas confirmed it is committed to working with the IRP TWG and other relevant stakeholders to consult on system pruning processes. It was also proposed that a jurisdictional scan be completed to identify how utilities in other jurisdictions are approaching natural gas system pruning to identify best practices, where applicable.[17]

In the Settlement Proposal for Phase 2 of the Company's 2024 Rebasing Application, all parties agreed that Enbridge Gas would develop and implement a system pruning pilot project. Specifically, Enbridge Gas would develop its approach to system pruning in consultation with the IRP TWG by the end of Q2 2025 and begin implementation on one or two pilots by the end of Q1 2026. Additionally, the Parties agreed that for these one or two pilots OEB approval is not required if the combined costs of these pilots are $5 million or less and the pilot(s) are supported by the IRP TWG. Further, the parties agreed that a new IRP System Pruning Deferral Account with a $5 million cap would be created for recording the incremental costs related to these activities for later recovery. Should Enbridge Gas forecast that the incremental costs of the IRP System Pruning pilot project(s) will exceed $5 million, then Enbridge Gas would be expected to request OEB approval through an IRP Plan application.[18] The OEB accepted the Settlement Proposal on November 29, 2024.[19]

In Q1 2025, Enbridge Gas consulted with the IRP TWG on the system pruning workplan and draft scope of work for the system pruning jurisdictional scan. OEB Staff confirmed a subcommittee of the IRP TWG ("TWG Subgroup") would be established for detailed consultation on the jurisdictional scan and pilot approach.

Enbridge Gas developed a workplan on the key elements required for the System Pruning pilot approach to meet the Q2 2025 deliverable, identifying the timing as to when elements would be brought forward to the TWG Subgroup for input and feedback, and when they would be shared with the full TWG to ensure alignment. With the provincial election occurring in February, consultation activities were put on pause during the writ period between January 31 to March 19, 2025, which impacted the timing of consultation with the TWG Subgroup on specific elements. Enbridge Gas continued to provide informational updates during this period, however discussion on items was deferred until consultation and cost-award eligibility were reinstated by OEB Staff. Following the end of the writ period, Enbridge Gas continued to engage with the TWG Subgroup and full TWG to finalize the approach and confirm support by the end of June 2025 for the System Pruning approach elements.[20] On July 4, 2025, Enbridge Gas filed its 2024 IRP Annual Report, with the System Pruning approach filed as Appendix G.[21]

In parallel to the development of the approach, DNV was engaged to conduct a jurisdictional scan on behalf of Enbridge Gas and the IRP TWG. A subcommittee of the IRP TWG was established for detailed consultation on the

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[16] EB-2022-0200, Phase 1 Decision and Order, December 21, 2023, p. 52
[17] EB-2024-0111. Phase 2, Exhibit 1, Tab 17, Schedule 1, April 26, 2024, p.17-27
[18] EB-2024-0111, Settlement Agreement, Exhibit N, Tab 1 Schedule 1, November 4, 2024, p.20-21.
[19] EB-2024-0111, Decision on Settlement Proposal and Interim Rate Order, November 29, 2024.
[20] Engage with Us, OEB (link) System Pruning Subgroup Meetings #2, 3, 4 (January 12, 2025, March 20, 2025, April 17, 2025), TWG Meetings #50 (March 26, 2025), Meeting #52 (April 23, 2025), Meeting #53 (May 7,2025), Meeting #54 (May 21, 2025), Meeting #55 (June 4, 2025), Meeting #56 (June 25, 2025).
[21] EB-2025-0064 Exhibit I.1.13-ED-4 Attachment 1

jurisdictional scan and approach. The scan was completed on August 15, 2025.[22] The purpose of this study was to better understand and gain insights into how gas utilities among North American and European jurisdictions are approaching pruning to their gas distribution pipelines, where informative to the Ontario context. The study was intended to provide a foundational understanding of system pruning approaches, best practices and lessons learned to assist in the development of pilots in Ontario. While the full jurisdictional scan report results were not available as the system pruning approach was being developed, as DNV was a participant in meetings of the system pruning TWG Subgroup and full TWG, input was provided in relation to the jurisdictional scan work in progress. The scan covered six utilities/jurisdictions – five were selected as they have planned or undertaken system pruning or non-pipeline activities, and one was selected because of their successful collaboration activities amongst their gas and electric utilities within that jurisdiction. Of the six studied jurisdictions, only two (California and New York) have completed actual system pruning projects. The study found that system pruning is a utility action in its infancy. "Among the reviewed jurisdictions, the primary driver of system pruning or Non-Pipeline Alternative (NPA) activities is a policy framework centered around climate and equity. Although considerations about system cost is a concern, it was not explicitly cited as the driver to policies that promote system pruning and NPAs."[23]

2025 Project Implementation Update

Following the TWG's support of the System Pruning approach in July 2025, implementation of the pilot began in Q3 2025, which included the following activities:

- **Contractor Engagement**
  Enbridge Gas engaged a contractor to serve as the delivery agent for the System Pruning Pilot. The Home Inspectors Group was selected through a Request for Proposal process which, amongst other criteria, sought contractors that were knowledgeable and unbiased about natural gas and electric equipment and appliances.

- **Pilot Candidate Selection**
  Enbridge Gas conducted an initial pre-screen with customers that met the selection criteria outlined in the Approach. This preliminary outreach provided information on the pilot and a pre-screen form for customers to express their interest level in participating in the pilot. Based on the results of the pre-screen, the contractor then initiated discussions with customers who had indicated that they were "Definitely Likely" to participate in the pilot, had confirmed they consent to Enbridge Gas sharing their contact information with the contractor to proceed to the next step and are the last customer at the end of a natural gas main (meaning that their disconnection would allow for decommissioning of their service and the associated main to their home, thus avoiding the eventual replacement of that portion of main and their service). Learnings from these "Definitely Likely" customers will inform next steps.

- **Electric Local Distribution Company ("LDC") Engagement**
  Enbridge Gas met with two LDCs to understand their processes and perspectives as they relate to the System Pruning pilot. Discussions with these LDCs included:
  - The degree to which system constraints are localized and can only be determined once specific addresses for pilot candidates are known
  - The fact that the LDCs are resource-constrained and would not be able to support prioritization of candidates based on network capacity
  - The standard processes that would be followed (and varied as required) should customer(s) convert off of natural gas

[22] Engage with us, OEB (link)
[23] DNV, System Pruning Jurisdictional Scan – Final Report (August 15, 2025), Key Findings section.

- How customers would contribute if network enhancements were required to support their conversion off of natural gas.
- The standard assumptions LDCs consider for subdivision planning, inclusive of natural gas for space and water heating

As implementation continues, engagement through these processes will be incorporated into the work of the contractor with the customer.

Enbridge Gas has continued to update and consult with the TWG on key elements of the pilot implementation.[24]

[24] Engage with us, OEB (link), IRP TWG Meeting #57 (July 30, 2025), Meeting #61 (December 3, 2025)

Section 5 – IRP Stakeholder and Indigenous Engagement Update

As part of the OEB's IRP Decision, the OEB determined that "the three components of Enbridge Gas's proposed Stakeholder Engagement Process will provide valuable input into Enbridge Gas's IRP activities and shall be incorporated in the IRP Framework. The three-component process includes: gathering of stakeholder engagement data and insight, stakeholder days, and targeted engagement. The OEB also directed the establishment of a website by Enbridge Gas to facilitate the broad sharing of information on IRP stakeholder efforts".[25]

Regional Engagement

Enbridge Gas conducted four regional webinars from December 2025 through January 2026. The format, which was previously delivered through multiple region-specific sessions, was revised to a single session offered on multiple days to provide flexibility for participants. Invitations to the webinar were sent to individuals subscribed to IRP updates, with a more targeted emphasis on those involved in energy and infrastructure planning, such as municipal staff and planners, community leaders, technical professionals, IESO Integrated Regional Resource Plan working group members, regulatory or policy representatives, along with others interested in the assessment and implementation of non-pipeline alternatives. This updated approach supported a broader review of the IRP evaluation results, including the key learnings from the process and the determination that no specific regional projects were identified to proceed with an IRP alternative.

The webinars covered topics including an overview of IRP and the assessment process along with updates on the AMP Addendum 2026, regional projects and IRP pilot projects. Each session concluded with a Question-and-Answer segment and information on how to stay engaged, including sharing feedback via the IRP mailbox. The total attendance across the four webinars was 51 participants. An additional 11 stakeholders not able to attend a session requested the webinar recording from Enbridge Gas.

During each session, attendees were encouraged to view the IRP webpage for additional information and opt-in to the mailing list to receive future email updates on project information and upcoming events. The feedback and responses shared during the webinars have been documented and shared on the IRP webpage, along with copies of the presentation deck and webinar recording.[26]

Following the webinars, an IRP newsletter was issued to IRP subscribers, and provided a summary of the regional webinars and pilot updates, with information on how to engage the IRP team and remain engaged.[27]

Municipal Engagement

Enbridge Gas engages with a wide cross-section of municipal audiences and stakeholders on an ongoing basis through a dedicated Municipal and Stakeholder Engagement (MSE) team, including at regional and province-wide municipal conferences as part of engagement on IRP within existing stakeholder engagement channels:

- ROMA (Rural Ontario Municipal Association) – January 2025
- NOMA (Northwestern Ontario Municipal Association) – April 2025
- OSUM (Ontario Small Urban Municipalities) – May 2025
- NODSA (Northern Ontario Service Deliverers Association) – June 2025
- AMO (Association of Municipalities) – August 2025
- OEMC (Ontario East Municipal Conference) – September 2025
- WOWC (Western Ontario Wardens Caucus) – October 2025

Additionally, Enbridge Gas participates in 50+ local events and symposiums throughout the year with local chambers of commerce, boards of trade, associations, and municipalities (e.g. the City of Toronto's Community Environment Days). During

[25] EB-2020-0091, IRP Proposal OEB Decision and Order, July 22, 2021, p. 66.
[26] Regional Planning & Engagement | Enbridge Gas
[27] Integrated Resource Planning (IRP) 2025 Newsletter

these conferences and events, dedicated members of the MSE team are on-hand to engage directly with attendees and answer questions related to IRP and IRP pilots (including ways to remain engaged). The relationships and contacts established at these forums support the development of the targeted IRP distribution list to ensure that dedicated municipal leads and subject matter experts can be engaged for regional stakeholder activities and targeted engagement where applicable.

Costs for exhibiting at conferences and events on an ongoing basis, such as booth costs, are not attributed to IRP as they represent an opportunity to leverage existing channels. Costs for events that are specific to an IRP initiative, such as the Chamber of Commerce Business Showcase noted in the SLH Project Plan Stakeholder Engagement Activities, are attributed to IRP, with Chamber of Commerce Business Showcase expenditures allocated to the SLH Pilot Project.

Targeted / Project-Specific Engagement

Enbridge Gas has proactively initiated engagement activities with local distribution companies (LDCs) in areas of high growth that could trigger an LTC project as part of the Company's approach regarding coordinated energy system planning. The purpose of these engagements is to develop understanding of each sector's planning approaches, share and discuss the basis for each sector's demand forecasts and, for Enbridge Gas, to determine if there is a need to adjust the Company's demand forecast and system design based on the shared information. Additionally, these engagement activities establish communication channels with LDCs which can support future information sharing and discussion. While a formal coordination framework has not yet been established, these engagements have resulted in meaningful discussion and collaboration between the gas and electricity sectors. This work is intended to enhance the comparability and clarity of key planning inputs and to support more effective coordination going forward. Enbridge Gas will continue to monitor the OEB's implementation of the Minister's Directive related to the government's Integrated Energy Plan.

Additionally, when applicable, Enbridge Gas implements a Non-Binding Expression of Interest (EOI) / Reverse Open Season (ROS) process to gather potential additional customer demands and identify opportunities to reduce existing contract customer demands, which ensures that the best available customer demand information informs project requirements and potential IRP opportunities. An EOI/ROS is triggered on a case-by-case basis for increased demand-driven LTC projects, and for defined geographic areas of benefit where Enbridge Gas contract rate customers have identified a need for increased or decreased capacity via their regular ongoing discussions with their Enbridge Gas account managers. IRP relevant questions have been embedded within the EOI/ROS form, including:

- Customer's interest in converting existing firm distribution service to interruptible distribution service if the ability to negotiate lower than posted interruptible rates was available.
- Customer's consideration of energy conservation activities in their bid amounts and existing demand and the customer's interest in considering additional energy conservation activities as it relates to reduction in contract bids or existing demand. This process will involve additional engagement with specific contract customers to discuss on-going DSM energy efficiency projects, as well as whether there are incremental opportunities for IRP alternatives, to ensure that the bid put forward is inclusive of consideration of both DSM and IRP.

Further details on project specific consultation are described in Section 6.

IRP Pilot Project

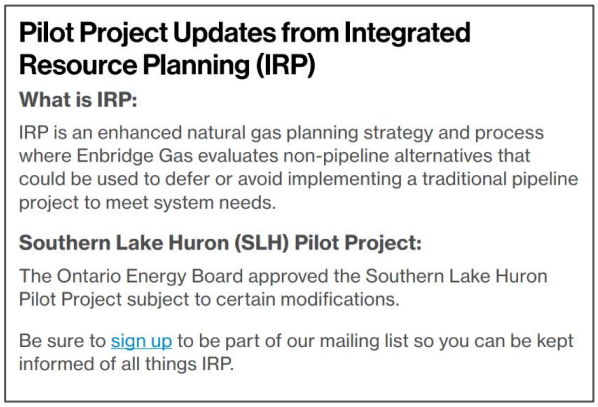
For the IRP Pilot Project, Enbridge Gas conducted stakeholder engagement with the local municipalities, municipal agencies, business associations, LDC, IESO and the local community to provide an overview of the pilot and to garner feedback on the proposed IRP alternatives in support of the initial filing of the application in 2023 and 2024. Refer to Section 4, of the Southern Lake Pilot Project for the stakeholder engagement conducted in 2025.

Indigenous Engagement

IRP has continued to provide Enbridge Gas's Indigenous Engagement team with informational materials for use during informal discussions, and during their normal course of engagements to highlight the Regional Engagement sessions and to promote registrations for engagement events that may be happening in their areas. This included incorporating IRP updates and the latest developments on the pilot projects within the summer edition of the Indigenous newsletter, Figure 5.5.

Additionally, contact details to address any further questions or to promote registration for updates were sent out by the Indigenous advisor for each region.

Figure 5.5 – Excerpt of the IRP section in the 2025 Indigenous newsletter



Pilot Project Updates from Integrated Resource Planning (IRP)

What is IRP:

IRP is an enhanced natural gas planning strategy and process where Enbridge Gas evaluates non-pipeline alternatives that could be used to defer or avoid implementing a traditional pipeline project to meet system needs.

Southern Lake Huron (SLH) Pilot Project:

The Ontario Energy Board approved the Southern Lake Huron Pilot Project subject to certain modifications.

Be sure to sign up to be part of our mailing list so you can be kept informed of all things IRP.

IRP was also discussed as part of the Indigenous Working Group ("IWG"), in response to a recommendation in The Brattle Group report that led to the suggestion that IRP be added as a standing item to the IWG agenda.[28] Enbridge Gas IRP staff participated in two IWG meetings on March 4 and July 15, 2025. The IWG meeting dated March 4 included a brief discussion on IRP activities, the IRP pilots, and IRP stakeholder activities, as well as a discussion item raised by Enbridge Gas on the potential for an IWG standing IRP agenda item to engage on future IRP activities and discussion. Enbridge Gas also advised that the Indigenous Nations, serviced by Enbridge Gas, received the information on the IRP webinars through their Community and Indigenous Engagement Advisor.

Additionally, a member of the IWG advised there was no Indigenous participation on the IRP TWG led by OEB staff, and suggested Enbridge Gas and the IWG jointly ask the OEB to be involved in the group. Enbridge Gas conveyed the request to OEB Staff in March 2025 and provided the IWG contact to OEB staff so they can discuss the request.

At the July 15, 2025 meeting Enbridge Gas discussed IRP and asked for member feedback on the best process to engage the IWG moving forward, as well as on the initial priority areas of focus for engagement. It was suggested by an IWG member that a smaller sub-group be established going forward to discuss IRP and the IWG and Enbridge Gas agreed on this approach. There was also a discussion on the engagement process and objectives for the Southern Lake Huron Pilot Project. Following the meeting Enbridge Gas shared the Pilot Project Application identifying the section outlining Indigenous group engagement and asked IWG members to indicate their interest in joining an IRP sub-group. Enbridge Gas subsequently sought input from the interested members on what topics would be of interest for discussion; however, no responses were received.

As such, at the November 26, 2025 IWG meeting, Enbridge Gas suggested removing IRP as a standing agenda item and that IRP be discussed at future meetings as requested. The IWG agreed. Additionally, where Enbridge Gas identifies IRP alternative opportunities that would include First Nations communities in the area of benefit, it would seek to work with First Nations in the development of its detailed approach, including through the IWG.

[28] The Brattle Group Report Recommendations, EB-2025-10-30, EB-2025-0155, Exhibit G, Tab 3, Schedule 1, Page 6 and Page 34 of 49

Section 6 – Non–Pilot IRP Plan Updates

IRP Plans will be developed for projects with technically and economically feasible IRPAs, where the IRPA is determined to be the preferred alternative to address a system need. This section provides an update on the status of IRP Plans in-flight and in development in 2025.

In 2025, Enbridge Gas completed the IRP screening and evaluation of all investments in the AMP that had a defined scope. At the economic evaluation stage, no potential IRP alternatives were identified as the optimal solution and the facility alternative was the solution in the best interests of Enbridge Gas and its customers to address the system need. Consequently, Enbridge Gas did not file any non-Pilot IRP Plan applications with the OEB.

Enbridge Gas will be monitoring the project scopes and annual review of the facility and IRP alternatives will be conducted to confirm the optimal solution prior to alternative implementation. Additionally, contract customer engagement within the area of benefit, where applicable, will be conducted closer to the forecasted in-service date. Table 6.1 summarizes the IRPA implemented since 2022.

Table 6.1 – Summary of IRP Solutions Implemented

Project Name	Project Description	IRP Alternative Identified	IRP Implementation Status	Facility Cost vs. IRPA Cost	IRP Implementation Outcome
East Kingston Creekford Reinforcement	Installation of 6.2km of NPS 8	Demand-side IRPA – contract demand turnback Supply Side IRPA –CNG	Completed	Forecasted facility cost = $24.3M Supply-side IRPA (CNG) cost = $0.6M	CNG was procured for the winters of 2022/2023 and 2023/2024, where the CNG agreement provided time for Enbridge Gas to implement a contract turnback to reduce contract demand and in turn avoid the facility project. The turnback was confirmed by the Contract Customer on November 11, 2022. This capacity was sufficient to defer the reinforcement; however, it was not received in time to avoid a CNG contract back-up solution.[29]

[29] EB-2023-0092, Exhibit C, Tab 1, June 14, 2023, p.20-25.

Section 7 – Integrated Resource Planning Alternatives Update

In its Decision and Order establishing an IRP Framework for Enbridge Gas, the OEB found that a "document on best available information for demand-side alternatives would promote more timely development of IRP Plans and directs Enbridge Gas to include a listing in its annual IRP Report."[30]

To provide an overview of the types of alternatives considered when addressing system needs, a summary of traditional facility alternatives, alongside the non-pipeline IRP alternatives, has been included in Table 7.1.

Enbridge Gas routinely evaluates traditional facility alternatives, where applicable, as part of project scoping to ensure the optimal alternative is reflected in the AMP. Enbridge Gas also incorporates forecast gas supply contracts into the development of the AMP. These contracts may influence the timing of transmission projects and, by providing firm supply at known transmission locations, may have the potential to avoid or reduce the need for new infrastructure. Enbridge Gas designs transmission facility requirements to integrate these firm deliveries.

IRP alternatives are assessed after the consideration of traditional facility alternatives and are evaluated against the established project scope in the AMP. Given the dynamic nature of facility planning and the evolving demand forecast, the assessment process can be iterative. Project scopes for both traditional facility and IRP alternatives are periodically reassessed to ensure up to date information is captured.

Table 7.1 - Summary of Facility and IRP Alternatives

Traditional Facility Alternatives	Loop existing pipeline (system reinforcement)
	Replace existing pipeline with a larger pipeline (system reinforcement)
	Install a new pipeline (with consideration for different routes)
	Add / upgrade stations serving system area
	Increasing system pressure (when applicable)
	Add compression to increase pipeline capacity (when applicable)
Supply-side IRP Alternatives	Compressed Natural Gas (CNG) / Liquefied Natural Gas (LNG)
	Market-based supply
Demand-side IRP Alternatives	Enhanced Targeted Energy Efficiency (ETEE)
	Demand Response (DR)
	Electrification Measures (specific to the pilot projects) *

* As part of the first-generation IRP Framework, the OEB determined that it is not appropriate to provide funding to Enbridge Gas for electricity IRPAs. However, a limited number of electrification measures are included in the Southern Lake Huron pilot project and System Pruning pilot.

[30] EB-2020-0091, IRP Planning OEB Decision and Order, July 22, 2021, p. 36

Appendix B: Integrated Resource Planning Alternatives provides additional information on both demand-side and supply-side IRP alternatives including “types of IRPAs, estimates of cost, peak demand savings, status in Ontario, the potential role and relevance to Enbridge Gas’s system, and learnings from pilot projects and other jurisdictions.”

Enbridge Gas expects the IRP pilot projects to provide additional information to refine and update the impacts of the IRP alternatives identified.

Section 8 – Technical Working Group Summary

In the IRP Decision, the OEB directed that an IRP TWG be established and led by OEB staff, to provide input on IRP issues that will be of value to both Enbridge Gas in implementing IRP, and to the OEB in its oversight of the IRP Framework.

All documents and presentations concerning the IRP TWG can be found on the OEB website.[31]

Attached in Appendix E: Technical Working Group Report is a report prepared by the IRP TWG.

[31] Natural Gas Integrated Resource Planning (IRP) | Engage with Us (oeb.ca)

Section 9 – DCF+ Methodology Update

In the IRP Decision, the OEB concluded that the DCF+ test should be the economic evaluation test used under the IRP Framework. Further, within its IRP Decision, the OEB recognized that the DCF+ test could be improved to better identify and define the costs and benefits of Facility Alternatives and IRPAs and clarify how these costs and benefits should be considered within the DCF+ test. The OEB directed Enbridge Gas to study the IRP DCF+ test and encouraged consultation with the TWG, which includes representatives from Enbridge Gas, OEB staff, and non-utility members.[32] Below is a summary of the key topics discussed in 2025 and the resulting outcomes that informed the economic evaluation of IRPAs, particularly in light of changes to the federal fuel charge.

On March 15, 2025, the Government of Canada enacted regulations with an effective date of April 1, 2025, to set the value of the federal fuel charge to $0 and to remove the requirement for provinces and territories to have a consumer-facing carbon price. In response to these changes, Enbridge Gas updated the enhanced DCF+ test to reflect the zeroing of the federal fuel charge and removal of the consumer-facing fuel charge rates.

At the March 19, 2025, TWG meeting, Enbridge Gas discussed the refinements to the DCF+ as outlined in its written responses provided to the TWG on January 16, 2025. In these refinements, Enbridge Gas confirmed that the DCF+ would follow a nominal approach in which revenues would be escalated in accordance with the approved price cap index (PCI) escalator, costs would reflect the best forecast available or reflect a 2% inflation in the absence of a forecast, and that the weighted average cost of capital (WACC) would remain at a nominal rate. TWG members were supportive of the proposed changes, as they agreed it aligned the costs and discount rate appropriately. The changes also served to address concerns regarding additivity of Phase 1 and Phase 2. TWG members remained concerned, however, about the additivity of Phase 3, as they said Phase 3 includes benefits calculated using the GDP multiplier, and that this multiplier accounts for incremental economic activity which is distinct from project-specific costs and benefits that are included in Phase 1 and Phase 2. In response, Enbridge Gas noted that they would present Phase 1 and Phase 2 separately and additively, and present Phase 3 independently.

Members of the TWG also noted that the social cost of carbon is a distinct cost that should be reflected in Phase 3. They expressed concern that setting the consumer carbon cost to zero could understate carbon-related impacts and that presenting Phase 3 separately may further de-emphasize those impacts. In addition, members of the TWG suggested exploring other non-energy benefits (NEBs), like employment impacts, in addition to GDP multipliers.

Reliability was raised as a topic requiring further discussion, particularly whether it should be included in the DCF+ test or separately as an additional consideration. Enbridge Gas noted that reliability is already reflected in the IRP alternative design considerations. Members also suggested quantifying the cost of service interruption associated with different options.

At the March 26, 2025, TWG Meeting, Enbridge Gas presented its DCF+ test results, incorporating the nominal adjustments it had described in the March 19, 2025, TWG meeting. Enbridge Gas outlined its proposed approach to identifying the most cost-effective alternative, which was to augment consideration of DCF+ Phase 1 results with the sum of DCF+ Phase 1 and Phase 2 results – and then prioritize the alternative with the highest combined net present value (“NPV”). Enbridge Gas noted that this approach optimized investment value while minimizing costs to all customers. To enhance efficiency, Enbridge Gas also discussed a potential threshold approach under which a sensitivity analysis would only be conducted for projects where the NPV differential is less than the absolute cost of lowest-cost alternative.

Discussion continued in the April 9, 2025, meeting, with TWG members’ feedback focused on the proposed sensitivity threshold and sensitivity analysis applied to the updated economic test results that now reflected the zeroing of the federal fuel charge. In particular, the change in fuel charge prompted TWG members to consider whether the DCF+ test remained the appropriate starting point for assessing IRPAs, or whether an alternative

[32] EB-2020-0091, IRP Planning OEB Decision and Order, July 22, 2021, p. 56-57.

approach could better support productive discussion and consensus-building where agreement was not reached (e.g. how to assess economic development and job impacts, and whether rate impacts or broader customer impact should be prioritized). Enbridge Gas continues to agree with the OEB's decision on the IRP Framework that the three-phase DCF+ is the economic evaluation to be used for IRP as it appropriately reflects the costs and benefits to ratepayers, participants, and society, with particular focus on rate impacts. The decision confirms that the test "best aligns with the goal and purpose of IRP planning, which is to address the system needs of Enbridge Gas's regulated operations and identify and implement the solution that is in the best interest of Enbridge Gas and its customers."[33] The fuel charge is only one input among the costs and benefits included in the test. Changing the value of an input, in accordance with prevailing policy, is not an appropriate basis for challenging the methodology. Enbridge Gas and other TWG members acknowledged that despite remaining differences, meaningful progress has been made in refining some aspects of the DCF+ through multi-year TWG consultation.

With respect to the mechanics of the DCF+ calculation, a TWG member suggested a secondary criterion to the sensitivity threshold that would identify the magnitude of cost reduction required for each alternative to achieve NPV parity with the preferred alternative. TWG members also noted the need for considerations beyond the combined Phase 1 and Phase 2 results, including whether Phase 2 results should be weighted given the IRP Framework's emphasis on rate impacts as assessed in Phase 1. In its review of Phase 3, Enbridge Gas confirmed that the fuel charge rate was set to $0 in accordance with the zeroing of the customer-facing federal fuel charge and that no alternative valuation of carbon could be incorporated into the economic test. Enbridge Gas asserted that the pricing of carbon should be aligned with government legislation and policy in all aspects of the calculation. TWG members agree with this approach for Phase 1 and 2, but expressed concerns with applying this approach to Phase 3 of the DCF+ since the purpose of Phase 3 is to reflect societal costs that are not reflected in Phases 1 and 2.

At the July 30, 2025 TWG meeting, Enbridge Gas presented DCF+ results for several new projects, incorporating additional considerations to support alternative selection. These considerations included identification of the lowest cost alternative and associated bill impacts, the alternative with the highest Phase 1 NPV, the alternative with the highest combined Phase 1 + Phase 2 NPV, and the projected demand profile over time. Based on the assessment of project cost, Phase 1 NPV and combined Phase 1 and 2 NPV, and the persistence and trajectory of demand[34], Enbridge Gas identified whether projects would be slated to proceed with the facility alternative or continue to be monitored for changes in forecast demand. Four projects were identified to proceed as a facility alternative and were included in the AMP Addendum 2026.

In the review of the alternatives' economic analyses, the TWG members reiterated concerns regarding not quantifying the social carbon costs in Phase 3. In addition, one TWG member noted that the Phase 3 multipliers used do not provide an accurate measure of impacts on jobs and the broader economy. Enbridge Gas restated its position that (1) the DCF+ test should include economic costs and benefits, consistent with OEB's jurisdiction and government policy, and (2) the GDP multiplier reflects the quantifiable flow of economic spending across sectors and is, therefore, an appropriate measure of these benefits. In this meeting Enbridge Gas and the TWG concluded that extensive consultation had been conducted on DCF+ test enhancements, that the positions of parties were well understood and that these positions have been considered. It was, therefore, determined that there was not value in having further discussion on the DCF+ test, and that any further discussion regarding the DCF+ methodology would be best had as part of a proceeding. Enbridge Gas will bring forward its application of the DCF+ methodology through the IRP Framework review and Implementation Plan.

[33] EB-2020-0091, OEB Decision and Order, Enbridge Gas Inc. Integrated Resource Planning, July 22, 2021, p. 56.
[34] See Appendix F for more detail on the economic evaluation approach and selection considerations as part of the overall screening process.

Section 10 – IRP Planning for 2026

This section provides a high-level summary of the work streams that Enbridge Gas expects to build upon and evolve further in 2026. These work streams are continuations of the work done in 2025.

External Stakeholder Outreach

Enbridge Gas will continue with its external stakeholder efforts including ongoing engagement with municipalities through existing stakeholder engagement relationships, as opportunities to engage on IRP and further develop targeted stakeholder lists.

Enbridge Gas will schedule regional or general stakeholder engagement sessions to support broader understanding of IRP and its process, provide updates on the IRP evaluations on the latest AMP and ongoing IRP initiatives. Feedback received from these stakeholder engagement sessions will be reviewed and considered for subsequent stakeholder sessions. As outlined in Section 5, engagement sessions will be accompanied by a newsletter to ensure subscribers remain informed on material IRP developments.

Enbridge Gas will continue to conduct Indigenous engagement through sharing ongoing IRP updates via the Enbridge Community and Indigenous Engagement newsletter as outlined in Section 5.

As Enbridge Gas continues the monitoring and review of the AMP, additional project specific engagement will be considered as applicable to the project scope. This includes engagement with municipalities, local LDCs and IESO to discuss demand forecasts and constraints in the area, as well as additional engagement with contract customers. Refinements to these processes will be considered with further experience.

Enhancements to the IRP webpage will continue, inclusive of updates to the IRP Pilot Project page, noted in Section 4.

Continued IRP Evaluation and Project Monitoring

Enbridge Gas will continue to conduct IRP screening and evaluation for projects within the capital plan.

An update on the projects reviewed from the AMP Addendum 2026 for the 2025-2034 period will be provided in the AMP Addendum 2027, anticipated to be filed in Fall 2026.

For projects that pass both the technical and economic evaluation, Enbridge Gas would develop and subsequently file a stand-alone non-Pilot IRP Plan application and supporting evidence with the OEB for approval where applicable.

Enbridge Gas will continue to work with Posterity Group as appropriate on updates to the IRP model through refreshing data inputs and refining modelling approaches, assumptions, and methodologies to improve forecasting of peak hourly flow reduction potential and costs. Additionally, Enbridge Gas will continue to refine the assumptions for ETEE and DR based on learnings and findings from the pilot as they become available.

DCF+ Test

Enbridge Gas will continue to consider feedback received in 2025 from the IRP TWG concerning the DCF+ enhancements and will file a submission on the DCF+ test as part of its first non-pilot IRP Plan application.[35]

Pilot Projects

As noted in Section 4, the OEB issued a Decision on the Southern Lake Huron IRP Pilot Project on March 27, 2025. In 2026, Enbridge Gas will continue to execute the SLH IRP Pilot plan included as Appendix H in the 2024 IRP Annual Report and updated as detailed in Section 4. The SLH IRP Pilot will continue to be updated, as necessary, as the IRP Pilot Project is implemented and evaluated. Enbridge Gas will continue to engage the IRP TWG for input and

[35] EB-2020-0091, IRP Planning Decision and Order, July 22, 2021, p. 56-57

review over the term of the pilot. The Pilot ETEE offers are expected to end by December 31, 2026, and the Pilot DR offer is expected to end by March 31, 2027. Pilot final reporting is expected in Q4 2027.

System Pruning

As noted in Section 10, Enbridge Gas has developed the approach for the pilot(s) in consultation with the TWG and initiated implementation of the pilot in 2025. Enbridge Gas will continue with field implementation of the pilot in 2026, inclusive of updating and consulting with the TWG on key elements as appropriate.

Policy Proposals

As per the Rebasing Phase 2 Settlement Proposal, Enbridge Gas agreed to propose an IRP incentive mechanism in its next IRP Plan application to the OEB, to be filed within one year of the date of filing of the Settlement Proposal (November 4, 2024). Enbridge Gas filed its IRP Incentive Mechanism application on November 4, 2025, where it also requested that the application be put into abeyance until the outcome of the IRP Framework Review proceeding is known. On December 22, 2025, the OEB granted the request, and the application currently remains in abeyance.

Framework Consultation

The OEB released a letter on March 27, 2025, outlining it was launching a consultation to support a review and evaluation of its IRP Framework for Enbridge Gas (EB-2025-0125). An OEB Staff report assessing progress implementing the IRP Framework and proposed updates to the IRP Framework was released in October 2025 and a stakeholder meeting was hosted on October 22, 2025, to discuss the proposed updates and solicit verbal comments. In response to the proposed updates, Enbridge Gas filed a written response to OEB staff's Discussion Paper on November 19, 2025. On April 28, 2026, the OEB issued a letter on the next steps for the IRP Framework, concluding its consultation and determining that Enbridge Gas should file an updated IRP Framework for adjudicative review by August 31,2026.

Appendix A: OEB IRP Directives and Progress Towards 2025 Priorities

The table below provides Enbridge Gas's progress toward meeting the Directives as ordered by the OEB in the IRP Decision. This is further described in detail in Rebasing Phase 3 (EB-2025-0064), Exhibit 1, Tab 13, Schedule 5.

Directive Item	Directive	Status
Interruptible rates	The OEB directs Enbridge Gas to study its interruptible rates to determine how they might be modified to increase customer adoption of this alternative service.	Completed – filed with Enbridge Gas's 2024 Rebasing Application (EB-2022-0200, Exhibit 8, Tab 4, Schedule 7). As part of the approved Settlement Proposal, Enbridge Gas received approval to implement negotiated interruptible rates as part of an IRP plan (EB-2022-0200, Decision on Settlement Proposal, Schedule A, Page 50, Issue 28). Enbridge Gas filed the rate design for harmonized- franchise contract rate classes in EB-2025-0064, Phase 3 Exhibit 8, Tab 2, Schedule 2 for OEB approval. The proposed harmonized rate design for interruptible customers provides an increased price spread between firm and interruptible rates compared to the current rate design. The harmonized rate design also provides a predictable cost outcome for customers who choose to elect interruptible service by reducing the variance in the spread of firm and interruptible rates between rate classes and between individual rate classes in each rate class.
Documentation of demand-side IRPAs	The OEB concludes that a document on the best available information for demand-side alternatives would promote more timely development of IRP Plans and directs Enbridge Gas to include a listing in its annual IRP Report. The OEB agrees with Enbridge Gas that supply-side alternatives require case-by-case examination and therefore are not required to be included in the listing.	Completed – list included since 2022 IRP Annual Report. Updated list included in Appendix B - Integrated Resource Plan Alternatives.
Asset Management Plan	The OEB directs that the AMP include information about Enbridge Gas' system needs. This includes providing the status of consideration of IRP Plans regarding meeting system needs, the result of the binary screening, and details on the evaluation.	Completed – most recent version filed with the Enbridge Gas Ontario Asset Management Plan Addendum – 2026 (EB-2020-0091)

DCF+ test enhancement	The OEB directs Enbridge Gas to study improvements to the DCF+ test for IRP and, as applicable, file an enhanced DCF+ test for approval as part of the first non-pilot IRP Plan.	In progress – will be filed as part of Enbridge Gas's first non-pilot IRP Plan application. The report Use of the Discounted Cash Flow-Plus Test in Integrated Resource Planning (IRP): Report of the IRP Technical Working Group presents the TWG's views on applying the DCF+ economic evaluation methodology.
IRP Website	The OEB also directs the establishment of a website by Enbridge Gas to facilitate the broad sharing of information on IRP stakeholder engagement efforts.	Phase 1 – Completed Phase 2 – Completed See Section 5 for more details on stakeholder engagement.
Technical Working Group	Establishment of a TWG with the OEB directing that membership should include Enbridge Gas, OEB staff, independent experts, and experienced non-utility stakeholders	Completed. The TWG members were selected by OEB Staff as of December 6, 2021 with meetings commencing January 2022. The TWG membership, Terms of Reference and meeting folders with materials and minutes is available at Natural Gas Integrated Resource Planning (IRP) | Engage with Us (oeb.ca)
IRP Deferral accounts	The OEB directs Enbridge Gas to prepare a Draft Accounting Order for the two IRP Costs deferral accounts, consistent with the direction of this decision.	Completed. On August 12, 2021, Enbridge Gas filed its draft accounting orders for the IRP Operating Costs Deferral Account and IRP Capital Cost Deferral Account. From the OEB Settlement Decision for 2024 Rebasing Phase 1 (EB-2022-0200), parties agreed to the modifications made to the IRP Operating Costs Deferral Account and IRP Capital Cost Deferral Account.[36] From the OEB Settlement Decision for 2024 Rebasing Phase 2 (EB-2024-0111), parties agreed that a new IRP System Pruning Deferral Account with a $5 million cap will be created for recording

[36] EB-2022-0200, Exhibit O1, Tab 1, Schedule 2, September 12, 2023, p. 39 and 40,

		incremental costs related to these activities for later recovery.[37]
IRP Pilot projects	The OEB expects that the IRP pilot projects will be selected and deployed by the end of 2022 as proposed by Enbridge Gas. The detailed consideration of IRP pilot projects should commence shortly after the issuance of the IRP Framework with input being sought from the IRP Technical Working Group described in Chapter 10 ("Stakeholder Outreach and Engagement Process").	In progress – See Section 4 for a summary on Pilot Project implementation which will continue as a multi-year priority. The requirement for Enbridge Gas to consult with the IRP TWG on a potential second IRP pilot is currently stayed by the OEB [38]

The table below provides Enbridge Gas's progress toward meeting the 2025 priorities as defined in the 2024 IRP Annual Report and 2024 IRP Technical Working Group report.

Priority	Activity	Status
External Stakeholder Outreach	External stakeholder outreach (including broader discussions with municipalities, regional engagement sessions, and geotargeted engagement in pilot areas)	Completed: • See Section 4 for a summary of the activities completed for the Southern Lake Huron Pilot Project and System Pruning Pilot Project. • See Section 5 for a summary of the activities completed for the stakeholder engagement process and Indigenous engagement.
Continued IRP Evaluations	IRP binary screening, and technical and economic evaluations of system needs in the AMP.	Completed: • See Section 3 for a summary of the IRP Assessment for investments in the AMP Addendum 2026. See Appendix C for a high-level breakdown of the investments screened or evaluated out of the AMP Addendum 2026 for IRP including the associated 2025-2034 forecast. • See Section 9 for a summary of the engagement on the results of economic evaluation and considerations to support alternative selection. See Appendix F, Economic Evaluation section, for a summary of the interpretation of DCF+ results. In-progress:

[37] EB-2024-0111, Exhibit N, Tab 1, Schedule 1, November 29, 2024, p.19-20,
[38] Decision on Threshold Question and Procedural Order No. 2, EB-2025-0333, March 24, 2026, p.2.

Priority	Activity	Status
		• See Section 2 for a summary of refinements to the ETEE model. Posterity Group has incorporated the TWG input received in 2024, and the final report will be available in Q2 2026. Learnings and findings from the SLH Pilot Project will be considered as they become available. • See Section 9 for a summary of the consultation on learnings from the economic evaluation results. These results will inform the IRP Framework review proceeding in 2026.
DCF+ Test	DCF+ Test consultation and methodology	Completed – See Section 9 for a summary of the consultation conducted. The positions of parties are well understood, and Enbridge Gas intends to bring forward its application of the DCF+ methodology with its first non-pilot IRP Plan.
IRP Pilot Project	Pilot project execution	In progress – See Section 4 for a summary on IRP Pilot Project implementation which will continue as a multi-year priority.
System Pruning	Develop its approach to system pruning in consultation with the IRP TWG by end of Q2 2025 and begin implementation of one or two pilots by end of Q1 2026.	In progress – See Section 4 for a summary of system pruning pilot project implementation which will continue as a multi-year priority.
Policy Proposals (for non-pilot IRP Plans)	Role of shareholder Incentives/ performance metrics for IRP, incrementality and use of IRP deferral accounts, treatment of risk, attribution between DSM and IRP.	Complete – IRP Incentive Mechanism application was filed on November 4, 2025 – the application currently remains in abeyance. In progress – the focus of the 2025 consultation prioritized the IRP Incentive Mechanism as opposed to a continuation of consultation on the additional IRP-related policy proposals. In relation to a broader IRP jurisdictional scan, the jurisdictional scan conducted by DNV for system pruning also included information related to non-pipe alternative programs and policies due to the infancy of system pruning activities. The approach for the policy proposals and additional jurisdictional review will be considered alongside the next steps in the IRP Framework Review proceeding.

Priority	Activity	Status
Framework Consultation	Engage in the Framework Review discussions led by OEB Staff during TWG meetings and participate in the Framework Review consultation	Completed – OEB staff engaged the TWG over the course of 2025. Enbridge Gas was a participant in the OEB consultation. The OEB issued a letter in April 2026 on the next steps for the IRP Framework, and has determined that Enbridge Gas should file an updated IRP Framework for adjudicative review by August 31,2026.

Appendix B: Integrated Resource Planning Alternatives

As per the IRP Decision, the IRP Annual Report is to include "a summary of the best available information on demand-side IRPAs, including the types of IRPAs, estimates of cost, peak demand savings, status in Ontario and learnings from pilot projects and other jurisdictions". Additionally, a summary of the best available information on supply-side IRPAs has been included below.

Demand Side IRP Alternatives

Enhanced Targeted Energy Efficiency ("ETEE")

IRPA Overview
Enhanced targeted energy efficiency ("ETEE") programs focus on achieving necessary reductions in a specific geographical area to reduce peak period system demands. ETEE programs could include enhancing existing broad-based Demand Side Management ("DSM") offerings through additional incentives and targeted marketing, or introducing new geo-targeted programs not offered through broad-based DSM. The mix of offerings and measures utilized in an ETEE program is dependent on the scope of the facility investment project under consideration, customer characteristics in the specific project services area, past DSM participation, etc. Broad-based DSM programs have been offered to natural gas customers across Ontario since 1993. On November 15, 2022, the OEB issued its Decision for the Company's 2023-2025 DSM Plan (EB-2021-0002) to guide ongoing broad-based DSM programming. As defined by the OEB in their DSM Letter, the objective of broad-based DSM is "assisting customers in making their homes and businesses more efficient in order to help better manage their energy bills". As ETEE programs focus on peak hour reductions, many ETEE measures would focus on enhancing existing broad-based DSM measures such as space heating equipment and building envelope upgrades. Enbridge Gas is undertaking the IRP Pilot Project (EB-2022-0335) to develop an understanding of how to design, deploy and evaluate ETEE programs and how ETEE programs impact peak hour demand within a geo-targeted area. The learnings from these IRP Pilots, as well as any non-pilot IRP Plans, will be incorporated into future iterations of the IRP Annual Report's Appendix B, "Demand Side Alternatives".
IRPA Peak Impacts
Forecast peak impacts will be estimated on a case-by-case basis depending on the ETEE program. Enbridge Gas worked with Posterity Group to build an end-use model of its service territory with the 2019 Achievable Potential Study ("APS") being the starting point for the IRP model. First, a mirror model of the APS was created and then several adjustments were made to better reflect Enbridge Gas's knowledge and experience of the Ontario DSM market, Enbridge Gas's current Technical Resource Manual (TRM) assumptions, and known changes to applicable standards.[39] Posterity Group then worked with Enbridge Gas to develop peak factors which were added to the IRP model so that enhanced targeted energy efficiency peak hour impact estimates could be developed for each region, sector, segment, and end use.[40] Posterity Group's IRP model is run through Posterity's

[39] Posterity Group report detailing the development and assumptions of the underlying mirror model (EB-2021-002, Exhibit E, Tab 4, Schedule 7, Attachment 1 – "Demand Side Management Planning Support Final Report Documenting Data Inputs, Assumptions and Method (April 2021)" - Link

[40] Posterity Group memo on peak modelling methodology and hours-use peak factor assumptions (filed as part of EB-2022-0157 (PREP) – Exhibit I.ED.7, Attachment 4) - Link. Posterity Group memo on calculation of peak reduction on an efficiency measure (July 2022) - Link

Navigator software, where the details in how the Navigator software works and how the model parameters interact with each other are available and documented.[41] Posterity Group and Enbridge Gas work to evolve this model by refining assumptions and assessment methodologies to refine and improve forecasting of peak hourly flow reduction potential. It is expected that the ETEE programs as part of the IRP Pilots will provide greater insight on the peak impacts of such programs.
IRPA Cost Details
Costs will be determined on a case-by-case basis depending on the ETEE program. The Posterity model described above also includes cost assumptions for ETEE programs, based largely on the APS, with adjustments made in an attempt to better reflect Enbridge Gas' knowledge and experience of the Ontario DSM market.[42] Posterity Group and Enbridge Gas evolve this model as required by refining assumptions and assessment methodologies so it can be used to assess project specific costs for an ETEE program. It is expected that the ETEE programs as part of the IRP Pilots will provide greater insight on the costs of such programs.
IRPA Deployment Strategy
The selection of energy efficiency measures for an ETEE program and the deployment strategy would be dependent upon the scope of the facility investment project under consideration, customer characteristics in the specific project service area, past DSM participation, etc. The IRP Pilots will provide insights that could guide the deployment strategy of future IRP ETEE programs. The pilots could also provide insights on the deployment strategy into the richness of customer ETEE incentive levels and the intensity of the ETEE program delivery approaches for various customer groups to drive the participation uptake levels necessary to meet peak demand reduction requirements.
IRPA Solution Timing
Timing on an ETEE IRPA solution is dependent upon the scope of the facility system need under consideration, the type of ETEE program(s) being considered, and the customer characteristics in the specific project service area. A high-level estimate of a 3-to-5-year minimum lead time would be required to support program implementation and deployment, and subsequent performance measurement to evaluate the impact to the system peak hour. ETEE can be deployed with supply-side IRPA(s) to defer the system need and ensure that Enbridge Gas can reliably meet peak hour system demand requirements while demand-side ETEE IRPA(s) are implemented.
IRPA Implementation Risks/Challenges
There are several operational risks related to ETEE: - Principle of universality (offering different DSM programing and incentives to different customers). - Undersubscription of ETEE programming to meet peak demand requirements to delay or avoid the facility system need. - Uncertainty on the reliability of peak reduction capabilities of ETEE measures to be delivered in a cost-effective manner for facility planning. - Coordination of timing between fully effective ETEE IRPAs and meeting the system needs.

[41] Posterity Group, Enbridge's Navigator End-Use Model Presentation: Posterity (Enbridge's Navigator End-Use Model) and "Navigator Energy and Emissions Simulation Suite – Functional Specification Document" (filed in EB-2022-0200 – Exhibit I.1.10-SEC-29, Attachment 1) - Link

[42] Posterity Group report detailing changes to reference case assumptions on DSM measures (EB-2021-002, Exhibit E, Tab 4, Schedule 7, Attachment 1, Appendix A) – "Demand Side Management Planning Support Final Report Documenting Data Inputs, Assumptions and Method (April 2021)" - Link

- Current lack of experience in implementing ETEE programming; DSM expertise in delivery programming has been broad-based.
- Variances in energy planning and the lack of coordinated energy planning between gas utilities, electric distributors and the IESO. Risk of insufficient electrical capacity to absorb electric measures as part of an ETEE program.

Learnings from Pilot Projects/Other Jurisdictions

Enbridge Gas filed a Geo-Target Demand Side Management Case Study in EB-2020-0091 at Exhibit C, Appendix A. The objectives of the case study were:

1. Assessment of the impacts of geo-targeted DSM programs on reducing peak hour demand.
2. Assessment of the costs of geo-targeted DSM program implementation.

The results from this case study only illustrate the impacts geo-targeted DSM had on the town of Ingleside and although informative and directional, the results cannot be generally applied due to the specific nature of customer composition.

In 2022, Enbridge Gas engaged Guidehouse to undertake a jurisdictional review of ETEE and DR natural gas pilots implemented for general service customers, where the pilots' objectives were to defer or avoid infrastructure.[43] Guidehouse focused on three jurisdictions, summarizing the pilot objectives, marketing activities, costs, findings, and challenges faced. Additionally, Guidehouse noted challenges in data availability in completing the jurisdictional review.

As part of the first-generation IRP Framework, the OEB determined that it is not appropriate to provide funding to Enbridge Gas for electricity IRPAs. However, a limited number of electrification measures are included in the Southern Lake Huron pilot project and System Pruning pilot.

In 2023, Enbridge Gas undertook some jurisdictional research in-house to better understand how non-pipeline electric alternatives could be offered more broadly in the future, including attending industry webinars.44 High-level learnings include that the Colorado Public Utilities Commission includes beneficial electrification as a non-pipeline alternative to offset gas infrastructure investments in the long-term.[45] [46] The New York Public Commission encourages gas utilities in New York to offer building electrification as a non-pipeline alternative as part of a program to remove leaking or leak-prone gas infrastructure. In California, the California Public Utilities Commission considers electrification as a non-pipeline alternative to meet energy needs in utilities gas-planning activities, and one utility is offering a small electrification program to facilitate the retirement of gas assets.47 Additionally, the California Energy Commission is funding two building electrification and gas infrastructure decommissioning pilots.[48] Many of the utilities reviewed in other jurisdictions are dual-fuel utilities with ability to coordinate internally, whereas Enbridge Gas would require coordinated planning with the IESO and LDCs to consider similar electrification plans. Enbridge Gas intends to continue its jurisdictional research into non-pipeline electric alternatives as part of its IRP demand-side alternatives, and of jurisdictions seeking to electrify customers as a means to decommission natural gas distribution pipelines.

In 2025, DNV was engaged to conduct a jurisdictional scan to support the development of the System Pruning pilot approach.[49] The purpose of this study was to better understand and gain insights into how gas utilities among

[43] IRP ETEE-DR Pilot Review April 8, 2022 Guidehouse (IRP ETEE-DR Pilot Review)
[44] TWG Meeting #32 (December 12, 2023) (link)
[45] Strategen, Non-Pipeline Alternatives: A Regulatory Framework and a Case Study of Colorado, October 2023. (link)
[46] Berkley Lab, Not Just a Pipe Dream: Non-Pipeline Alternative Framework Analysis and Experiences. (link and recording)
[47] Strategen, Non-Pipeline Alternatives to Natural Gas Utility Infrastructure: An Examination of Existing Regulatory Approaches, November 2023. (link)
[48] California Energy Commission, Gas Research and Development Program Proposed Budget Plan for Fiscal Year 2023-2024, May 2023. CEC-500-2023-020.pdf (ca.gov)
[49] Engage with us, OEB (link)

North American and European jurisdictions are approaching pruning to their gas distribution pipelines, where informative to the Ontario context. The scan covered six utilities/jurisdictions – five were selected as they have planned or undertaken system pruning or non-pipeline activities, and one was selected because of their successful collaboration activities amongst the gas and electric utilities within that jurisdiction. Of the six studied jurisdictions, only two (California and New York) have completed actual system pruning projects. The study found that system pruning is a utility action in its infancy. Among the reviewed jurisdictions, the primary driver of system pruning or non-pipeline alternative activities is a policy framework centered around climate and equity. Although considerations about system cost represent a concern, it was not explicitly cited as the driver to policies that promote system pruning and NPAs.

Demand Response ("DR")

IRPA Overview
Natural gas demand response aims to reduce natural gas customers' demand during peak periods. For residential and commercial customers, this can commonly be seen in the form of gas demand reductions during DR program events via thermostat control or water heater temperature settings. For contract customers, this can be done through leveraging interruptible rates. Demand response would include: 1. Negotiable interruptible rate - as detailed in Section 9, the use of interruptible rates was reviewed as part of the IRP Framework Decision, and Enbridge Gas filed an Interruptible Rate Study that evaluated the use of demand response in the context of future IRP Plan Application where applicable. 2. Utilization of another alternative (i.e., onsite CNG) when a peak hour/day event is called. 3. Incentives to shift peak hourly demands to off-peak periods. Enbridge Gas is undertaking the IRP Pilot Project (EB-2022-0335) to develop an understanding of how to design, deploy and evaluate residential DR programs and how residential DR programs impacts peak hour demand within a geo-targeted area. The learnings from the IRP Pilot, as well as any non-pilot IRP Plans, will be incorporated into future iterations of the IRP Annual Report's Appendix B, "Demand Side Alternatives".
IRPA Peak Impacts
Peak impacts will be determined on a case-by-case basis depending on the DR service (e.g., program, rate design etc.). As a starting point for a residential space heating smart thermostat program, an estimated impact of 18.5% peak gas (m3/hr) reduction was developed based on the evaluation of SoCal's residential smart thermostat DR program[50] and adjusted for Ontario climate/buildings.[51] It is expected that the residential DR program as part of the IRP Pilot Projects will provide greater insight on the peak impacts of such a program.
IRPA Cost Details
DR IRPA costs will be determined on a case-by-case basis depending on the DR service (e.g., program, rate design etc.). It is expected that the residential DR program as part of the IRP Pilot Projects will provide greater insight on the actual costs to deploy such a program.

[50] https://www.calmac.org/publications/SoCalGas_2019_DR_Evaluation_Report_-_PUBLIC_FINAL.pdf
[51] Adjustment for Ontario climate/buildings provided on p.2 - Link

IRPA Deployment Strategy
The deployment strategy will be determined on a case-by-case basis depending on the customer mix and characteristics in the project area. The IRP Pilot residential DR program will provide insights that could guide the deployment strategy for future programming. For contract rate customers, as part of the IRP evaluation process, Enbridge Gas engages with all contract customers in the project area to assess whether those customers could reduce their peak demands, convert their firm demand service to interruptible service or leverage another fuel source.
IRPA Solution Timing
DR IRPAs are dependent upon the scope of the facility system need under consideration, the type of DR program being considered, and the customer characteristics in the specific project service area. The IRP Pilot residential DR program will provide insight on the time required to design a DR program and to deliver a DR program to reach participation levels required to inform future assessment for specific facility IRPAs. Engagement of contract rate customers will occur as part of the detailed technical assessment.
IRPA Implementation Risks/Challenges
There are several operational risks related to a residential DR program: • Principle of universality (offering DR programing/incentives to different geographically specific customers) • Undersubscription and lack of persistent participation of DR programming to meet peak demand requirements of the delay or avoidance of facility system need • Uncertainty on the reliability of cost-effective DR performance for facility planning • Coordination of timing between fully effective DR IRPAs and meeting the system needs • Current lack of experience in implementing DR programming; Enbridge Gas has not previously implemented a gas-DR program for general service customers.
Learnings from Pilot Projects/Other Jurisdictions
In 2022, Enbridge Gas engaged Guidehouse to undertake a jurisdictional review of ETEE and DR gas pilots implemented for general service customers, where the pilots' objectives were to defer or avoid infrastructure [52]. Guidehouse focused on three jurisdictions, summarizing the pilot objectives, marketing activities, costs, findings, and challenges faced. Additionally, Guidehouse noted challenges in data availability in completing the jurisdictional review.

[52] IRP ETEE-DR Pilot Review April 8, 2022 Guidehouse (IRP ETEE-DR Pilot Review)

Supply Side IRP Alternatives

Compressed Natural Gas ("CNG")

IRPA Overview
CNG is a mobile solution that can be used in place of traditional pipeline reinforcement to meet customer demands at peak hours on peak days. Natural gas is compressed into large tube trailers and moved by trucks from the compression station "hub" to a mobile decompression station "spoke" where the gas is delivered into the pipeline. This is an active control best utilized in long, single feed pipe networks with cold weather peaking loads. Hub stations are situated in relative proximity to spoke stations (within 200 kms) to minimize driving distance.
IRPA Peak Impacts
CNG targets peak hours on peak demand days, where the injection of gas back into the system at the spoke station would have an equivalent 1 for 1 offset of gas otherwise required to flow through the traditional pipeline bottleneck. Injecting near the low-pressure point on the system would magnify the benefit beyond 1 for 1 on a hydraulic basis. Although the trailered gas will need to be withdrawn from the system at the hub station, this can be done at off-peak times and locations and where capacity is available.
IRPA Cost Details
From a capital cost perspective: • Tube trailers typically have a capacity of 10,000 m^3 of natural gas (at standard conditions) and cost approximately $700,000 per trailer with a 15-year useful life. • Hub and spoke stations costs can vary based on capacity requirements, but typically cost approximately $300,000 and $3M per station, respectively, with a 20+ year useful life. Capital costs may be impacted by the procurement strategy of utilizing a third-party vendor or procurement of the asset by Enbridge Gas. From an operational cost perspective, the equipment requires regular maintenance and supervised operation. Drivers are also required to drive the trailers between the hub and spoke stations with highway tractors.
IRPA Deployment Strategy & Timing
The equipment is mobile and can be deployed in various locations throughout the province. CNG would be most ideal in areas where the gas demands are large enough to achieve economies of scale but small enough to be practical. For instance, the transmission pipeline scale is too large as it may require hundreds of trailers, but a few households would be too small as a single trailer will be underutilized. Additional consideration based on location would impact the suitability of CNG as a solution, such as urban versus rural and the number of trucks required. Depending on the system need and location, CNG can be a suitable bridging solution for ETEE implementation or for the deferral of baseline facility projects as system needs may evolve, inclusive of the energy transition landscape in Ontario. CNG can be deployed in a relatively short amount of time, and can be scalable by the addition of mobile compressor stations and trailers.
IRPA Implementation Risks/Challenges
The biggest risk associated with this solution is a potential disruption in the supply of trailers to the spoke station, for instance road closure due to weather or an accident while in transit. To mitigate this risk, extra trailers can be made available on-site at the spoke station and the associated additional costs would need to be considered when assessing the viability of this IRPA.

Market-Based Supply

IRPA Overview

Market-based supply-side IRP alternatives include incremental natural gas deliveries or pressure increases at specific interconnects between Enbridge Gas's system and other pipelines, such as the TC Energy Mainline and US based pipelines including Panhandle Eastern Pipeline Company and Vector. These alternatives are considered in the IRP assessment as governed by the IRP framework and are incremental to the options previously considered as part of gas supply planning, as governed by the Gas Supply Framework.

Contracting for market-based supply-side alternatives into Enbridge Gas's franchise area, where applicable and available, can reduce, defer or mitigate traditional infrastructure by meeting incremental natural gas demands in a defined area through incremental deliveries or increased pressures.

IRPA Peak Impacts

Incremental deliveries or increased pressure must be delivered in the project area to impact peak hour demands. Therefore, market-based supply side alternative options are limited to interconnects with TC Energy along the mainline and Enbridge Gas's system or with interconnects with other pipelines that connect to Enbridge Gas's system such as Parkway, Ojibway and Dawn.

IRPA Cost Details

Market-based supply-side alternative costs are based on market dynamics at the time of contracting. Enbridge Gas cannot forecast the cost of market-based supply-side options on a long-term basis. The IRPA costs will be incremental to options previously considered under gas supply planning, as governed by the Gas Supply Framework.

IRPA Deployment Strategy and Timing

Enbridge Gas can contract and deploy market-based supply-side alternatives if the deliveries from a third party or pipeline are available.

While U.S. interstate pipelines regulated by the Federal Energy Regulatory Commission are permitted to offer both short-term and long-term transportation services, access to incremental capacity at specific interconnects is subject to upstream capacity availability, tariff terms, and commercial negotiations. In practice, opportunities to secure market-based supply-side services from U.S. pipelines are market condition dependent, and may be limited in duration, and location. As many of Enbridge Gas's interconnects are with U.S. pipelines, these factors must be assessed on a case by case scenario to determine the extent to which market-based supply-side services can be relied upon as IRP alternatives.

IRPA Implementation Risks/Challenges

There are two primary operational risks with market-based supply-side alternatives: limited availability of incremental capacity and delivery risk.

Market-based supply side alternatives rely on availability of incremental capacity at specific interconnects, which is contingent upon upstream pipeline conditions and competing market demand, particularly during peak periods. As a result, while market-based supply-side alternatives may be used to defer a facility project in the near term where capacity is available, their ability to fully mitigate a need over the planning horizon is uncertain. In instances, a market-based supply-side alternative could be used to defer a project in the short-term and then the need and IRP alternatives will need to be reassessed.

While Enbridge Gas may have contracted for a market-based supply side alternative, if the capacity underpinning the service is not firm, then natural gas market dynamics may cause the supplier to fail on its delivery obligations. For example, without firm capacity underpinning the market-based service, during peak weather events upstream pipeline systems may become constrained and non-firm services can be curtailed. If the service provider is relying on non-firm services, it may be unable to supply natural gas to Enbridge Gas. While contract penalties and other contract language may limit most events like the example above from happening, it remains a legitimate and

material risk. If the contracted service was not delivered as planned, Enbridge Gas could have insufficient gas supply deliveries to meet its market demands; potentially resulting in a system outage during the coldest periods of the year. While Enbridge Gas would collect financial penalties, if applicable, after the event occurred, Enbridge Gas would still need to deal with the physical and customer impacts that resulted due to the failed delivery of the incremental gas on that day.

Appendix C: IRP Screening and Evaluation Results

This section includes the following summaries on the IRP screening and evaluation results:

- Investments that did not pass the initial screening stage are included in Table 1
- Investments that did not pass the binary screening stage are included in Table 2
- Investments that did not pass the technical screening stage are included in Table 3 [53]
- Investments that did not pass the technical evaluation stage are included in Table 4
- Investments that did not pass the economic evaluation stage are included in Table 5

Table 1 – Breakdown of Investments Screened out in Initial Screening of the 2025-2034 AMP for IRP

Category	2025-2034 Forecast (Includes overhead allocation)	# of Investments
Non-Gas Carrying	$1,048M	334
Grand Total	**$1,048 M**	**334**

Table 2 – Breakdown of Investments Screened out in Binary Screening of the 2025-2034 AMP for IRP

Category	2025-2034 Forecast (Includes overhead allocation)	# of Investments
Customer Connection – related projects are required to serve new customers connected in accordance with guidelines of EBO 188. The OEB concluded that as part of the first-generation IRP Framework it is not appropriate to provide funding to Enbridge Gas for electricity IRPAs.	$1,231.7 M	112
Customer Specific Build - If an identified system constraint/need has been underpinned by a specific customer's (or group of customers') clear request for a facility option and either the choice to pay a Contribution in Aid of Construction or to contract for long-term firm services delivered by such facilities, then it is not appropriate to conduct IRP analysis for those projects.	$127.1 M	8
Dollar Threshold - If a facility project is being advanced for replacement or relocation of a pipeline and the cost is less than the minimum project cost that would necessitate a Leave to Construct approval, then an IRP evaluation is not required.	$455.1 M	634
Economic Development - If a facility project has been driven by government legislation or policy with related funding explicitly	$7.8 M	2

[53] Appendix F, Table 1 outlines investment categories screened out for IRP at the technical screening stage and the associated rationale.

aimed at delivering natural gas into communities, then an IRP evaluation is not required		
Emergent Safety - If an identified system constraint/need is determined to require a facility project for Enbridge Gas to offer safe and reliable service or to meet an applicable law, an IRP evaluation is not required.	$13.8 M	6
Timing – If an identified system constraint/need must be met in under 3 years, an IRPA cannot be implemented and its ability to resolve the identified system constraint/need cannot be verified in time. Therefore, an IRP evaluation is not required. Exceptions to this criterion could include consideration of supply-side IRPAs and bridging or market-based alternatives where such IRPAs can address a more imminent need.	$0.01 M[54]	1
Grand Total	**$1,835.5 M**	**763**

Table 3 – Breakdown of Investments Technically Screened out of the 2025-2034 AMP for IRP

Category	2025-2034 Forecast (Includes overhead allocation)	# of Investments
NPS 2, cannot downsize or retire	$16.3 M	6
Compression Station related projects are required to maintain existing deliverability and throughput. This is necessary to maintain security of supply and stable natural gas pricing during supply disruptions.	$453.4 M	628
Storage Pools & Well related projects are required to maintain existing deliverability and throughput. This is necessary to maintain security of supply and stable natural gas pricing during supply disruptions.	$108.6 M	88
Hydrogen related projects are required as no IRPAs can replace the hydrogen feasibility assessments and hydrogen blending initiatives.	$7.96 M	1
Distribution station condition related, IRPA not applicable	$365.8 M	544
Additional Screening for Investment descriptions where IRPAs are not applicable[53]	$2,255.4 M	324
Project Status/Timing Related	$251.4 M	19
Grand Total	**$3,458.9 M**	**1610**

The category in Table 3 with the highest capital costs is “Additional Screening for Investment descriptions where IRPAs are not applicable” [53].

[54] Investment #103275 (ISD 2022, Growth asset class) was binary screened out for “Timing” in the 2023-2032 Asset Management Plan. The $0.01 M amount pertains to final project closeout costs.

Table 4 – Breakdown of Investments Technically Evaluated out of the 2025-2034 AMP for IRP

Category	2025-2034 Forecast (Includes overhead allocation)	# of Investments
Potential project scope could be replaced with NPS 2. IRPAs not applicable and scope to be confirmed when project enters the detailed design phase.	$152.2 M	55
IRPAs unable to defer, reduce or eliminate project scope.	$2.9 M	1
Grand Total	**$155.1 M**	**56**

Table 5 – Breakdown of Investments Economically Evaluated out of the 2025-2034 AMP for IRP

Category	2025-2034 Forecast (Includes overhead allocation)	# of Investments
Facility alternative is the optimal solution, and the project scope will be monitored. Annual review of the facility and IRP alternatives will be conducted to confirm optimal solution prior to alternative implementation.[55]	$30.1 M	20
Pilot Project	$0.3 M	1
Grand Total	**$30.4 M**	**21**

[55] The facility was the optimal solution at both the Ph1 and Ph1+2 level for the investments evaluated.
For the subset of investments applicable to supply-side alternatives, a cost reduction in the range of 85% to 150% would be required for the supply-side alternative to achieve parity with the facility alternative at Ph 1 and Ph 1+2. This outcome is driven by the need to construct a facility once the supply-side deferral period ends.

For the subset of investments applicable to demand-side alternatives, a cost reduction in the range of 100% to 150% was required for the demand-side alternative to achieve parity with the facility alternative at Ph 1 and a cost reduction in the range of 50% to 150% at Ph1+2. This outcome is driven by relatively higher demand-side implementation costs compared to the achievable cost savings.

Appendix D: IRP Screening Results for Facility Applications

This section provides a summary of any on-going facility applications or facility applications where an OEB Decision was provided in 2025. This section does not include LTC Exemption Applications.[56]

OEB Proceeding Docket	Project Name	Binary Screening Results			Enbridge Gas IRP Analysis	OEB Regulatory Proceeding Status
		Customer Specific Build	Timing	Community Expansion & Economic Development		
EB-2023-0343	East Gwillimbury Community Expansion Project			Fail	Enbridge Gas has applied the Binary Screening Criteria and determined this Project meets the definition of a community expansion project, as defined in the IRP Framework, as the Project has been approved by the government of Ontario as part of the Phase 2 NGEP, to provide access to natural gas services in the Town of East Gwillimbury. The IRP Framework Decision explains that "Given the goal of the Ontario Government's Access to Natural Gas legislation to extend gas service to designated communities, the OEB will not require Enbridge Gas to develop an IRP Plan or consider alternatives to the infrastructure facilities to meet this need.	Proceeding is currently in progress.
EB-2024-0187	Boblo Community Expansion Project			Fail	Enbridge Gas has applied the Binary Screening Criteria and determined this Project meets the definition of a community expansion project, as defined in the IRP Framework, as the Project has been approved by the government of Ontario as part of the Phase 2 NGEP, to provide access to natural gas services in the Town of East Gwillimbury. The IRP Framework Decision explains that "Given the goal of the Ontario Government's Access to Natural Gas legislation to extend gas service to designated	Proceeding is currently in progress.

[56] On September 24,2024, the OEB released new Filing Requirements applicable for exemption on hydrocarbon line projects that cost between $2M and $10M, where information on project need and alternatives are not required.

OEB Proceeding Docket	Project Name	Binary Screening Results			Enbridge Gas IRP Analysis	OEB Regulatory Proceeding Status
		Customer Specific Build	Timing	Community Expansion & Economic Development		
					communities, the OEB will not require Enbridge Gas to develop an IRP Plan or consider alternatives to the infrastructure facilities to meet this need.	
EB-2024-0200	St. Laurent Pipeline Replacement Project				As this is a pipeline integrity project, the IRP Analysis for this project was limited to whether the proposed pipeline size can be reduced, as neither a supply side or demand side alternative would adequately address the corrosion and third party damage risk. Enbridge Gas reviewed potential IRPA such as incremental gas supply, trucked CNG, ETEE and for contract customers to de-contract or convert existing firm service to an interruptible service. These alternatives were found to not be technically feasible or viable solutions.	OEB Decision dated March 18, 2025: The OEB grants Enbridge Gas's application for leave to construct the project. The OEB finds that the Project is in the public interest based on an examination of the Project need, alternatives, cost and economics, environmental impacts, land use requirements, and Indigenous consultation. The OEB finds that Enbridge Gas's consideration of alternatives, which included facility and non-facility alternatives, is sufficient to demonstrate that full replacement is the preferred option in this case.
EB-2024-0304	2025 Waubuno Well Drilling Project				Enbridge Gas has applied the Technical Screening Criteria and determined that the Project Need does not warrant further IRP consideration as this project is driven by the need to maintain deliverability and throughput.	On May 8, 2025, the OEB issued a report to the Minister of Natural Resources recommending the issuance of a well drilling license to Enbridge Gas for the well, subject to certain Conditions of License.
EB-2024-0322	Kimball-Colinville and Bickford MOP Increase Project				Enbridge Gas is undertaking this project to increase the storage capacity of the Kimball-Colinville and Bickford Storage Pools. Since the underground storage reefs are finite containers with defined boundaries, the only way to physically increase the storage capacity of the reefs is to increase the MOP, allowing more gas to be stored in the reef. Enbridge Gas stated that it is	OEB Decision dated May 13, 2025: The OEB grants Enbridge Gas approval to increase the MOP of the Kimball-Colinville and Bickford Storage Pools subject to certain conditions. The OEB accepts Enbridge Gas's assessment that there are no alternatives to increase the

OEB Proceeding Docket	Project Name	Binary Screening Results			Enbridge Gas IRP Analysis	OEB Regulatory Proceeding Status
		Customer Specific Build	Timing	Community Expansion & Economic Development		
					not aware of any alternative to increase the capacity (volume) in the reef.	storage capacity of the Storage Pools other than through an increase in the MOP.
EB-2025-0073	Mississauga Reinforcement Project	Fail			Enbridge Gas has applied the Binary Screening Criteria and determined that this Project meets the definition of a Customer-Specific Build, as defined in the IRP framework, Customer-Specific Builds Customer-Specific Builds – if an identified system need has been underpinned by a specific customer's (or group of customers) clear request for a facility project and either the choice to pay a Contribution in Aid of Construction or contract for long-term firm services delivered by such facilities, then an IRP evaluation is not required.	OEB Decision dated February 19, 2026: The OEB grants Enbridge Gas's application for the leave to construct the project. The OEB finds that the Project is in the public interest based on an examination of the Project need, alternatives, cost and economics, environmental impacts, land use requirements, and Indigenous consultation. The OEB finds that Enbridge Gas's consideration of alternatives, which included facility and non-facility alternatives, is sufficient to demonstrate that full replacement is the preferred option in this case.
EB-2025-0271	Washago Community Expansion Project			Fail	Enbridge Gas has applied the Binary Screening Criteria and determined this Project meets the definition of a community expansion project, as defined in the IRP Framework, as the Project has been approved by the government of Ontario as part of the Phase 2 NGEP, to provide access to natural gas services in the community of Washago and surrounding areas. The IRP Framework Decision explains that "Given the goal of the Ontario Government's Access to Natural Gas legislation to extend gas service to designated communities, the OEB will not require Enbridge Gas to develop an IRP Plan or consider alternatives to the infrastructure facilities to meet this need.	Proceeding is currently in progress.

OEB Proceeding Docket	Project Name	Binary Screening Results			Enbridge Gas IRP Analysis	OEB Regulatory Proceeding Status
		Customer Specific Build	Timing	Community Expansion & Economic Development		
EB-2025-0301	Port Colborne Reinforcement Project	Fail			Enbridge Gas applied the IRP Binary Screening Criteria and determined that this Project meets the definition of a Customer-Specific Build, as defined in the IRP Framework: Customer-Specific Builds – If an identified system need has been underpinned by a specific customer's (or group of customers') clear request for a facility project and either the choice to pay a Contribution in Aid of Construction or to contract for long-term firm services delivered by such facilities, then an IRP evaluation is not required.	Proceeding is currently in progress.
EB-2025-0306	Lanark and Balderson Community Expansion Project			Fail	Enbridge Gas has applied the Binary Screening Criteria and determined that because the Project is a community expansion project driven by government legislation, an IRP evaluation is not required. In its Decision and Order on the IRP Framework, the OEB explains that "[g]iven the goal of the Ontario Government's Access to Natural Gas legislation to extend gas service to designated communities, the OEB will not require Enbridge Gas to develop an IRP Plan or consider alternatives to the infrastructure facilities to meet this need.	Proceeding is currently in progress.
EB-2025-0307	Waubuno Gathering System and Compressor Replacement Project				Enbridge Gas has applied the Technical Screening criteria and determined that the Project Need, does not warrant further IRP consideration. This project is required to maintain existing physical storage space capacity and capability.	Proceeding is currently in progress.
EB-2025-0293	2026 Kimball-Colinville Well Drilling Project				Enbridge Gas has applied the Technical Screening criteria and determined that the Project need does not warrant further IRP consideration as the Project is driven by the need to maintain existing injection and withdrawal capability and system	Proceeding is currently in progress.

OEB Proceeding Docket	Project Name	Binary Screening Results			Enbridge Gas IRP Analysis	OEB Regulatory Proceeding Status
		Customer Specific Build	Timing	Community Expansion & Economic Development		
					throughput. This is necessary to maintain security of supply and stable natural gas pricing during supply disruptions.	

Appendix E: Technical Working Group Report

Review of Enbridge Gas Inc. 2025 Integrated Resource Planning (IRP) Annual Report and Update on IRP Working Group Activities

From: Integrated Resource Planning Technical Working Group

May 29, 2026

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1. Introduction and Overview of IRP Working Group

The Ontario Energy Board (OEB) established a first-generation Integrated Resource Planning (IRP) Framework for Enbridge Gas through its July 22, 2021 Decision and Order (IRP Decision). The IRP Decision directed the OEB to establish an IRP Technical Working Group (Working Group) and required that a Working Group report be filed in the same proceeding as Enbridge Gas's annual IRP report. The Working Group was formed and announced in a letter issued by the OEB on December 6, 2021, and has been active since then.

This Working Group report provides:

- The Working Group's review of Enbridge Gas's Annual IRP Report and comments on Enbridge Gas's implementation of the IRP Framework in 2025 and priorities for 2026, including individual member comments or concerns. (**Chapter 2**)
- A summary of activities undertaken by the Working Group from mid-June 2025 to the end of 2025. Activities prior to this are covered in the previous Working Group report.[1] (**Chapter 3**)

The Working Group report was prepared by OEB staff with input from all current Working Group members and approved by them as an accurate summary of the Working Group's activities.[2] This report clearly indicates where opinions expressed in the report do not reflect the views of all members.

1.1. Overview and Membership of IRP Working Group

The Working Group was established with an objective to provide input on IRP issues that will be of value to both Enbridge Gas in implementing IRP and to the OEB in its oversight of the IRP Framework. Members of the Working Group were determined through a call for nomination process where the OEB selected non-utility members, representatives from the OEB and Enbridge Gas, and an observer from the Independent Electricity System Operator (IESO). Other Enbridge Gas representatives also attend Working Group meetings as required, depending on the topics under discussion. For example, Catherine McCowan leads the system pruning work

[1] Previous Working Group reports have included details of Working Group activities beyond the end of the calendar year until near the date of report issuance. In order to align with the time period covered by Enbridge Gas's annual IRP report, this year's Working Group report only includes activities up to the end of 2025 (and thus covers a shorter time period than previous reports).
[2] The Working Group includes an observer from the Independent Electricity System Operator. As noted in the Working Group's Terms of Reference, any materials authored by the IRP Working Group (including this report) should not be considered to represent the views of Working Group observers or their organizations.

for Enbridge Gas and Eric Buan leads the work on the Southern Lake Huron Pilot and attended Working Group meetings in these capacities in 2025.

There were no Working Group member changes over the past year:

Table 1: Current IRP Working Group Membership

Name	Role
Michael Parkes	OEB staff representative (Working Group chair)
Stephanie Cheng	OEB staff representative
Alison Moore	Enbridge Gas representative
Whitney Wong	Enbridge Gas representative
Helen Tong	Enbridge Gas representative
John Dikeos, ICF Consulting Canada Inc.	Non-utility member
Tamara Kuiken, DNV Inc.	Non-utility member
Cameron Leitch, Enwave Energy Corporation	Non-utility member
Chris Neme, Energy Futures Group	Non-utility member
Dwayne Quinn, DR Quinn & Associates Ltd.	Non-utility member
Jay Shepherd, Shepherd Rubenstein Professional Corporation	Non-utility member
Stuti Rungee, Independent Electricity System Operator	Observer

Meeting notes and materials for all IRP Working Group meetings are published on the OEB's website following meetings to document key discussion points and to allow stakeholders to follow the Working Group's progress.[3] These materials can be found at: https://engagewithus.oeb.ca/irp

[3] Meeting materials are typically posted online shortly after the meeting. Meeting notes are not typically posted until after the following meeting, to allow for members to review draft notes and identify any omissions or inaccuracies.

2. Review of Enbridge Gas's Annual IRP Report and Comments on IRP Framework Implementation

Per the IRP Decision, the Working Group is expected to review a draft of Enbridge Gas's annual IRP report. The review is coordinated by OEB staff.

Enbridge Gas is expected to provide the Working Group with a draft of its annual IRP report far enough in advance of its planned filing with the OEB to allow the Working Group adequate time to review and comment. The IRP Decision also stipulates that the Working Group report should include any comments on Enbridge Gas's annual IRP report, including material concerns that remain unresolved within the Working Group.

Consistent with prior years, the Working Group's review took the following steps:

STEP 1:

Enbridge Gas

Provided a draft of its 2025 IRP annual report to the Working Group for review.

STEP 2:

Working Group Members

Provided suggested edits/ comments/ clarifying questions.

STEP 3:

Enbridge Gas

Revised and finalized its annual report.

- Enbridge Gas discussed member comments at the April 8, 2026 meeting.
- Enbridge Gas subsequently finalized its annual report, documenting how it addressed comments from Working Group members. Final determinations as to the contents of Enbridge Gas's IRP annual report were made by Enbridge Gas, not the Working Group.



STEP 4:

Working Group Members

Provided final individual comments on implementation of the IRP Framework for inclusion in the Working Group report.

Member comments are discussed further below in Section 2.1.

2.1. Working Group Comments on the Implementation of the IRP Framework and 2026 IRP Priorities

Working Group members reviewed Enbridge Gas's description of its IRP activities in its 2025 IRP annual report (sections 1-9 of the annual report, plus relevant appendices) and also the IRP work streams identified by Enbridge Gas for 2026 (section 10).

To categorize its 2026 IRP priorities, Enbridge Gas used the same work streams as in 2025:

- External Stakeholder Outreach
- Continued IRP Evaluation and Project Monitoring
- Discounted Cash Flow-Plus (DCF+) Test
- Pilot Projects
- System Pruning
- Policy Proposals
- Framework Consultation

Specific new activities identified by Enbridge Gas for 2026 include:

- Working with Posterity Group on updates to the IRP model to improve forecasting of peak hourly flow reduction potential and costs, and refining modeling assumptions based on learnings and findings from the pilot as they become available.
- Continued execution of the Southern Lake Huron IRP Pilot plan, including implementation, wind-down, and evaluation and reporting, and engaging the Working Group for input and review on these actions.

- Field implementation of the system pruning pilot, inclusive of updating and consulting with the Working Group on key elements as appropriate.
- Next steps in the IRP Framework Review, contingent on OEB direction.

Working Group members (except observers) were asked the following question:

> ***Having reviewed Enbridge Gas's description of its IRP activities in the previous year in its final 2025 IRP annual report and having also participated in the IRP Working Group, do you have any comments and/or concerns with the implementation of the IRP Framework in 2025? Do you have any comments or concerns regarding the priority IRP work streams Enbridge Gas has identified for 2026 (section 10 of the Enbridge Gas annual IRP report)?***

Working Group members generally viewed 2025 as a year of incremental but still insufficient progress on IRP implementation. Members were pleased with the much-awaited implementation of the Southern Lake Huron IRP pilot and the continued development of the system pruning pilot as important steps that are expected to yield useful learnings. However, members generally expressed ongoing frustration that IRP progress remains slower than originally contemplated, in that five years after the initial OEB-approved IRP Framework, IRP has not yet meaningfully displaced or deferred conventional gas infrastructure investment. Several members noted the persistent disagreement and lack of resolution (between Enbridge Gas and the Working Group) on core elements of the framework – particularly the DCF+ cost-effectiveness test and the overall IRP screening process – as key constraints on advancing IRP alternatives as a viable, scalable option for ratepayers.

Working Group members generally emphasized evaluation and synthesis of lessons learned from the pilots – especially the Southern Lake Huron pilot, alongside implementation and evaluation of the system pruning pilot – as the top near-term priority for 2026. Several members called for faster iteration and decision-making so learnings can translate into timely adjustments and scaling (including planning for subsequent pilots in parallel with evaluation). In addition, several members highlighted the need to address foundational analytical and policy issues that have slowed progress, including resolving or reforming the DCF+ test and examining why so few projects are meaningfully exposed to IRP evaluation. Suggested areas of focus included stronger sensitivity analysis in demand and cost modelling (to test conditions under which an

IRP alternative could be preferred and the value of deferral), greater transparency on actual facility project costs and realized demand relative to forecasts, and using the IRP Framework review to consider changes that improve regulatory certainty, accountability, and the overall speed and effectiveness of the Framework.

OEB staff will work with Enbridge Gas to develop a schedule/work plan for the Working Group based on 2026 priorities.

Comments provided by individual members can be found below in **Table 2**.
Comments from Enbridge Gas Working Group members follow in **Table 3**.

Table 2: Individual Comments of IRP Working Group Members

Working Group Member	Comments (optional)
John Dikeos (non-utility member)	It was encouraging to see movement on the long-delayed SLH pilot program in 2025. Enbridge also demonstrated progress towards the implementation of a system pruning pilot project. Although there has been a noticeable uptick in the pace of progress over the past couple years, I agree with most of the comments and concerns shared by other members of the TWG, and the pace of progress is still too slow for IRPAs to become a viable alternative that can be applied to a meaningful portion of gas infrastructure projects in the near future. In particular, the structure of the IRP framework has been hindering progress, so the ongoing review of the framework presents an important opportunity for improvement. I'm hopeful that it will be meaningly restructured to help enable success. As I noted in my feedback to Enbridge's 2024 IRP annual report, top priorities in the review of the IRP Framework should include a review of stated goals and objectives, support for the consistent and long-term valuation of GHG emissions benefits, and a requirement for Enbridge to consider stranded asset risks for new gas infrastructure projects. The IRP Framework review should also consider a nimbler process for any related pilots and projects to allow for quicker implementation and learnings and reduced risks in implementing IRPA projects. Finally, as other TWG members have stated, important changes to the DCF+ cost-effectiveness methodology for IRPA projects are needed and

	related updates to the IRP Framework could help expedite this process. Regarding the priority IRP work streams that Enbridge Gas has identified for 2026, the target sample for system pruning seems to be unnecessarily constrained, despite feedback on this point from myself and other TWG members. However, I'm hopeful that Enbridge will pivot as necessary to ensure that the system pruning pilot garners broader feedback on the potential for wider implementation. Given the extended timeline for pilot approvals and the ongoing need for learnings related to broader IRPA project implementation, I would also suggest that Enbridge start considering additional pilots, targeting potential gaps from ongoing initiatives.
Tamara Kuiken (non-utility member)	I am pleased that 2025 finally saw the implementation of an IRP pilot. While 2025 also saw extensive research into and planning for system pruning, I feel the overall timeline continues to be too slow to achieve the learnings necessary to protect ratepayers from unnecessary investments. For 2026, as mentioned by the OEB staff, I think evaluation of the IRP pilot should be of highest priority. I would also like to see changes to the process that encourage faster learnings, even at the cost of slightly increased risk, and faster implementation as new learnings come in. Specifically I'd like to see the following considered: • Changes to the framework to improve the speed of the entire process. The System Pruning scan found that regulatory uncertainty will result in delays and stakeholder opposition; I believe we're seeing that in action in Ontario. As we work to disrupt the way the natural gas industry does business, maybe we need to consider how the regulatory industry can change to more closely match the current rate of business. We are creating new processes and business models; iteration must happen faster. • Changes to the DCF+ test to make it internally consistent and logical. Cost effectiveness testing has been the number one disagreement between the TWG and EGI for the last five years. We have exhausted all paths to compromise. Per my previous bullet, changes need to be made to help resolve questions like this in a more timely manner.

	• Faster decision-making and action to quickly scale based on learnings. The initial feedback from the IRP pilot suggests success. Based on previous experience, it takes a long time (more than 1 year?) to design and plan implementation of such a pilot. I'd like to see processes in place that encourage immediate planning for the next pilot, paced to parallel the learnings received by the evaluation process as they come in. To be more specific, I'd like to see the TWG investigate and make recommendations to the OEB on how the regulatory and oversight process can be adjusted (on a pilot basis, if necessary) to allow greater innovation and faster iteration, which provides greater value for ratepayers.
Cameron Leitch (non-utility member)	I'm encouraged that the SLH IRP Pilot is progressing, but like other TWG members continue to be frustrated at the rate of progress. Most of the TWG members have been involved since inception more than 5 years ago, when direction was to identify and commence implementation of a pilot within a year. I think a majority would agree that if we could have foreseen the rate of progress 5 years out, "success" wouldn't be the first noun that comes to mind. This last sentence, like the following brief summary, mimics the same comments I'd made in the 2024 report and in years prior to that. We've spent a substantial amount of time debating the mechanisms of DCF+ with very little modification despite very little rationale for keeping things the same. But as it turns out, we needn't have spent so much time since so few investments (in this recent IRP Report, 20 of approximately 2,800) get an opportunity to be evaluated. And since Enbridge is resolved to argue the DCF+ mechanism that they have chosen when the first non-pilot IRP Alternative is brought forward (notably after it manages to "pass" the current DCF+ methodology), it will likely be some time before this debate is resolved. There have been thousands (perhaps tens of thousands) of investments in the AMPs over the past 5 years, and billions of dollars invested, all while not a single non-pilot IRP has been able to compete based on the current methodology. It seems unfathomable, but I believe there are opportunities to understand why this process has been so one-sided, and I think there is merit in the investigation of those opportunities in 2026.

	Although we have had insight into the modelling of demand, current market volatility (in particular a dramatic slowdown in new construction, considerable inflation in construction material and labour indices, and significant swings in commodity costs due to global factors and market mechanisms - particularly in the Ontario electricity market) should be reflected through the modelling of significant sensitivities. Those sensitivities should help us answer the questions "what would have to happen for an IRP Alternative to be preferred", and the corollary "what would have to happen for the Facility investment to fall out of favour". Especially with the recent uncertainty in growth, there must be a way to determine the value in deferring an investment decision. In addition to sensitizing inputs for forward-looking modelling and assessment, some insight into actual costs that Enbridge has encountered on projects (relative to budgeted costs) and what the actual incremental demand realized was compared to what was forecasted (and how close the Posterity model was to reality) based on recent investments, would give the TWG some familiarity with the level of certainty in the proposed requirements and forecasted cost for traditional facilities projects. We've spent significant time talking about IRPAs and their costs and value, but appreciably less questioning the other side, and I think that merits some investigation. Lastly, and it may be optimistic, but I hope to see a non-pilot IRPA be identified to proceed in 2026.
Chris Neme (non-utility member)	My comments on the IRP Working Group's efforts and progress in 2025 are similar to those I provided in 2024, and echo those of Jay Shepherd below. While the Working Group still does useful work, including providing input on the Lake Huron pilot and the new pruning pilot, the group has not succeeded in advancing non-pipe alternatives (NPAs) as a truly viable alternative to capital investment in Enbridge's distribution system. As Mr. Shepherd notes, five years after the Board's order in the IRP case, we have just two pilots underway while many billions of dollars have been invested in traditional infrastructure investments. I believe that this is a function of a flawed policy framework.

	That is not to say that the IRP Working Group has not provided value. I think it has. For example, some good work has been done in helping shape the Lake Huron pilot (even if it took much longer than it should have to get it launched). However, the Working Group's value is constrained by current policy. For example, despite, what I consider to be very compelling economic and policy arguments for changing key aspects of the cost-effectiveness test for NPAs (DCF+), progress on that issue has stalled and will stay that way absent new direction from the Board. I also want to observe that the sensitivity of the Company's forecast of necessary distribution system investments to changes in forecast levels of demand, which is discussed below, raises questions about whether the value of the Company's system-wide DSM programs in reducing or deferring capital investment is being adequately captured in avoided costs used to assess DSM cost-effectiveness. Given the debate that often occurs around the rate impacts of DSM, analysis of the relationship between the magnitude of projects in the AMP and load growth should be undertaken and used to estimate the value system-wide DSM provides in reducing distribution system investments and the related downward pressure on rates associated with such reductions. For 2026, the Working Group can continue to provide some value in reviewing results and synthesizing lessons learned from the two pilots and contributing to considerations of modifications to the current IRP policy framework.
Dwayne Quinn (non-utility member)	As noted in some submissions, when the Parry Sound pilot was deferred (appropriately), not only was this event a loss of one of only two pilots ordered by the Board, but also it eliminated a project that was supplied by a single source making it ideal to evaluate the system benefit of the IRP measures. It is unfortunate that in the over two years since EGI informed the TWG that the system need was deferred, there has been no advancement of a comparable pilot project. As commented on below in the Pilot project section, I believe there is a need to establish a solid initial baseline from which to evaluate the system need that is generated from a verified simulation. Once that system baseline is established, the utility can evaluate the base case, prudent facilities' investment to meet the system need. The cost of this facilities

	investment would be compared against IRPAs to support an informed decision on how to proceed.
Jay Shepherd (non-utility member)	My comments from the 2024 Report continue to be applicable today. After five years since the OEB mandate/direction, and many years of discussion before that, IRP has still not been used to delay or replace any gas infrastructure. During that period, something in the order of $10 billion or more of facilities projects have proceeded. The primary cause of this is an OEB-approved IRP methodology/framework in which each of the multiple steps is designed to screen out an IRP alternative. The result is that none remain viable; all are screened out. As long as that continues to be true, Enbridge will continue to successfully prevent, delay, and avoid the implementation of any alternatives to building conventional gas distribution rate base. The current IRP Framework Review will, I hope, allow for a broader discussion of other ways to move IRP forward, with the goal of making the energy services provided to Ontario residents more economic and sustainable for the long term. In the meantime, the impact of the Working Group, while still valuable, is somewhat limited. Of significant concern is that Enbridge Gas has consistently refused to provide Working Group members with access to the several models on which they rely heavily. This is surprising given that some Working Group members have considerable experience with these types of models. It appears to me to be inefficient to delay disclosure of those models until a formal regulatory proceeding with multiple parties, when they will likely be produced by order, and their review at that time will delay and complicate the proceeding. This refusal raises the possibility that these models may be poorly designed, biased, or otherwise embarrassing to Enbridge. It is noteworthy that Enbridge finally shared one of the models, the ETEE model, only after being called out for failing to do so in these comments. Since making my original comments, I have seen the Enbridge comments, which appear to be solely directed at seeking to rebut everything the non-utility members have said

	in their comments. Most striking is the statement that screening out all IRPAs should be considered a successful use of the IRP Framework. This reinforces my previously stated view that Enbridge will not implement any meaningful IRPAs until they suffer consequences for failure to do so, of which the most useful consequence would be to have some or all of the risk of stranded or underutilized facilities investments fall on the shareholders rather than the ratepayers.
Mike Parkes/ Stephanie Cheng (OEB staff representatives)	**Comments and/or concerns with the implementation of the IRP Framework in 2025**: • 2025 saw encouraging developments with the Southern Lake Huron IRP pilot coming to market, and the approach to a system pruning pilot being developed (for implementation in 2026). Both of these pilots should provide useful learnings regarding IRP. The Working Group played an important role in providing input on the design of both of these pilots. • The OEB released an OEB staff discussion paper in October 2025 assessing progress implementing the IRP Framework and proposing updates to the IRP Framework. Taken together, these proposals are intended to continue to drive the adoption of the most prudent infrastructure or IRP alternative to meet a given system need, while improving the IRP value-to-effort ratio and positioning the natural gas sector to quickly and effectively adapt to various potential future scenarios. Input from the Working Group in 2025 was helpful to OEB staff in refining the proposals in the discussion paper. OEB staff does not have any additional comments or specific concerns with the implementation of the IRP Framework in 2025. **Comments or concerns regarding the priority IRP work streams Enbridge Gas has identified for 2026 (section 10 of the Enbridge Gas annual IRP report)**: • Of the noted priority IRP work streams, continued work on implementing and evaluating the two pilots (Southern Lake Huron and system pruning) should be the highest operational priority, and is an area where input from the Working Group can add significant value. • In addition, the OEB's direction for Enbridge Gas to file an updated IRP Framework for adjudicative review will also impact the priority IRP work streams for 2026.

	Enbridge Gas had previously indicated plans to conduct an updated IRP jurisdictional scan, with a contributing role for the IRP Working Group (similar to the approach taken for the completed system pruning jurisdictional scan described in the IRP Annual Report). OEB staff believes this scan would be a valuable input for the IRP Framework adjudicative proceeding and encourages Enbridge Gas to proceed with it, including the proposed role for the Working Group. The updated IRP Framework will likely include requirements for Enbridge Gas to develop and file an Implementation Plan as a second phase of the IRP Framework proceeding. OEB staff expects that Enbridge Gas will seek input from the IRP Working Group on the draft Implementation Plan (particularly technical aspects of the plan) before it is reviewed by the OEB. • It is also expected that supporting IRP policy/guidance documents developed by Enbridge Gas would be filed as part of the Implementation Plan approval request. The IRP model and methodology developed by Posterity Group and used by Enbridge Gas to forecast peak hourly flow reduction potential and costs from IRP Alternatives (discussed in Section 10 of the Enbridge Gas annual IRP report) is one specific guidance document which OEB staff encourages Enbridge Gas to work with the IRP Working Group to review and refine before it is considered in the adjudicative proceeding.

Table 3: Comments of Enbridge Gas IRP Working Group Members

Working Group Member	Comments (optional)
Alison Moore/ Whitney Wong/ Helen Tong (Enbridge Gas representatives)	Pilot Projects Enbridge Gas agrees with member comments that implementation of the SLH Pilot Project and System Pruning Pilot is a high priority for 2026. TWG members expressed encouragement regarding the advancement of the Pilots, while also noting frustration with the delay for the SLH Pilot Project relative to the deployment timing in the IRP Framework. While the timing of the regulatory proceeding for the updated SLH Pilot Project Application was outside the

	Company's control, Enbridge Gas took proactive steps in advance of the OEB issuing its Decision to expedite implementation where possible. This included moving forward with incremental resourcing required for the pilot, initiating activities required to retain an evaluation contractor, and engaging larger commercial and industrial customers in the pilot area in a targeted effort to identify potential participants to expedite the implementation of individualized hourly metering. For the System Pruning Pilot, Enbridge Gas has met the milestone dates established in the Rebasing Phase 2 Settlement Agreement and conducted extensive consultation with the TWG. Enbridge Gas has, and will continue to, consult with the TWG for input as implementation and evaluation of the pilots progress. In response to a member's suggestion of establishing a solid initial baseline for the SLH Pilot Project, Enbridge Gas notes that the evaluation methodology considers detailed customer-level data, aggregated to establish an appropriate baseline, as outlined in the evaluation plan. This approach provides the information required to assess system level impacts of ETEE and DR on peak demand. System level data is not available or required to meet the pilot objectives, as previously discussed with the TWG. While the pilot is expected to provide insights that are applicable to similar customer segments across the Enbridge Gas system, application of these learnings to specific system constraints will be dependent on system characteristics and may require appropriate scaling. As such, the existence of a specific facility need or system constraint within the pilot area is not required to achieve the objectives of the Pilot Project. With respect to member comments on considering additional pilots more broadly, Enbridge Gas maintains its view that it is not efficient or appropriate to proceed with consideration of another IRP Pilot Project while the OEB's IRP Framework Review is underway. This position is consistent with OEB's Findings in the Motion to Review Decision, which varied the March 27,2025 Decision to remove the requirement for Enbridge Gas to consult with the TWG on a potential second IRP pilot as part of the SLH Pilot Project proceeding. The OEB found that it would not be efficient or cost-effective for Enbridge Gas and TWG members to begin discussions on a second pilot project in parallel with the IRP Framework

	Review and stated that matters related to any further IRP pilot projects are to be addressed through the Framework Review.[1] <u>IRP Framework Review</u> Multiple members commented on the structure of the IRP Framework and the opportunity to evolve it through the IRP Framework Review proceeding. Enbridge Gas agrees on the importance of ensuring clarity in IRP objectives and policies. However, consistent with its comments from 2024, Enbridge Gas does not agree that IRP success or progress should be assessed based on the implementation of non-pilot IRP alternatives, as this does not reflect whether the IRP evaluation process has been properly applied in accordance with the Framework. The purpose of the IRP Framework Review, and objective of IRP more broadly, is not to maximize the number of IRP alternatives implemented, but rather to ensure the most appropriate solution is identified to address system needs. The outcome of this process, where an IRP alternative is not selected as the preferred alternative, represents a finding as opposed to a failure in the IRP Framework or its implementation. In 2025, Enbridge Gas completed the IRP assessment of all investments in the AMP with a defined scope. Enbridge Gas considers the IRP Framework Review an opportunity to improve regulatory and operational efficiency, including a “fit-for-purpose” approach informed by experience gained through implementing the IRP assessment process. The IRP Framework Review will also provide the opportunity to ensure IRP is aligned with Ontario government policy, consistent with OEB direction (EB-2025-0125), which notes that Enbridge Gas’s updated IRP Framework application should consider relevant elements of Ontario’s Integrated Energy Plan.[2] Enbridge Gas does not agree with member comments that the updated IRP Framework should include long-term valuation of GHG emissions benefits or consideration of stranded asset risks and does not agree with member criticisms of the DCF+ cost-effectiveness methodology. However, Enbridge Gas considers these matters most appropriately addressed through the IRP Framework Review proceeding rather than through continued TWG consultation.

	With respect to stranded asset risk, demand forecasting sensitivities and forecast validation, Enbridge Gas considers the rebasing proceeding to be the appropriate forum to assess the demand forecasting methodology, capital planning and related assumptions. Addressing these issues across multiple proceedings would be inefficient and may result in inconsistent and/or incomplete considerations. Within the IRP economic evaluation process, Enbridge Gas has introduced a single-variable cost sensitivity analysis to support comparison of alternatives informed by input from the TWG in 2025. This analysis considers the degree to which the cost of alternatives would need to change to achieve parity with the preferred alternatives on a DCF+ Phase 1 net present value basis. Enbridge Gas is developing a template to support the economic evaluation of IRP alternatives, inclusive of this information, which will be shared with the TWG in 2026. Enbridge Gas also acknowledges comments regarding the anticipated development of an IRP Implementation Plan as a subsequent phase of the IRP Framework Review, including the opportunity for TWG input into the development and refinement of supporting elements of the plan. Enbridge Gas agrees that TWG engagement will be included in this process, recognizing that such engagement should not duplicate prior consultations. For example, extensive consultation has already occurred on the DCF+ test and Enbridge Gas has incorporated modifications that it has determined are appropriate. With respect to jurisdictional review, Enbridge Gas agrees that such information can be useful, provided it considers the proper context in relation to Ontario (such as differences in policy objectives, regulatory mandates, system characteristics, etc.). Given the infancy of system pruning activities, the system pruning jurisdictional scan prepared by DNV was broader in scope and incorporated relevant insights on non-pipe alternative programs, policies, and framework level considerations. However, in the context of IRP objectives and Ontario's public policy framework, the scan reported a key distinction: identified jurisdictions[3] that are considering, planning or implementing non-pipe alternatives are primarily driven by decarbonization and climate goals, which reflect policy contexts that differ from Ontario.

	Additional jurisdictional review will be considered alongside the next steps in the IRP Framework Review proceeding. ETEE Model Enbridge Gas does not agree with the characterization that it has consistently refused to provide TWG members with access to its models. During TWG Meeting #56 (in June 2025), Enbridge Gas provided a detailed overview of its internal ETEE model, including the methodology, key assumptions and formulas underpinning its application. Enbridge Gas subsequently provided a follow-up at TWG Meeting #59 confirming the consistency of the forecasting approach, the basis for the peak-to-annual savings factor, and the treatment of load diversification. Provision of the model was not discussed or requested during 2025 consultations. At TWG Meeting #63 (in April 2026), a TWG member requested access to the model. Enbridge Gas explained that its approach had reflected its objective to receive input on the methodology of the model and input on assumptions, recognizing that the model is an analytical tool requiring appropriate context and governance for use, including within Enbridge Gas. Enbridge Gas does not accept that its consultation approach reflects concerns with the model's design or application. At Meeting #63, Enbridge Gas committed to considering the request for a copy of the model. Following consideration of TWG feedback, Enbridge Gas provided the ETEE model to the TWG in May 2026. This reflects Enbridge Gas's continued commitment to transparency, responsiveness to TWG input, and meaningful engagement. [1] EB-2025-0333, Decision and Order - Motion to Review Decision on Integrated Resource Planning Pilot Project, May 14, 2026 [2] EB-2025-0125, Next Steps - Integrated Resource Planning Framework Review for Enbridge Gas, April 28, 2026 [3] The exceptions were Oklahoma at the "considering" phase with a primary economic driver associated with exploring a roadmap of creating a hydrogen economy and Denmark at the "implementing" phase with a primary driver on reducing reliance on Russian gas imports.

3. Description of Key Working Group Activities in 2025

Enbridge Gas's IRP priorities for 2025 were previously identified in its 2024 IRP annual report. These included:

- External Stakeholder Outreach
- Continued IRP Evaluation
- Discounted Cash Flow-Plus (DCF+) Test
- Pilot Projects
- System Pruning
- Policy Proposals (for non-pilot IRP Plans)
- Framework Consultation

Progress on each of these items was subsequently discussed in some form with the Working Group in 2025, with particular emphasis placed on the two pilots (Southern Lake Huron Pilot and System Pruning Pilot). Progress on these pilots (implementation and evaluation) had been identified by Working Group members in the 2024 IRP Working Group report as the top IRP priority for 2025. Working Group discussion to inform the OEB staff discussion paper on the IRP Framework review was also a focus. A high-level summary of key topics discussed by the IRP Working Group is provided in the subsections below. Readers can refer to the meeting folders on the OEB's Engage with Us IRP webpage[4] for meeting materials and meeting notes summarizing key discussion points and outcomes. Refer to Table 4 below for a summary of meeting dates and key topics discussed at each meeting.

Table 4: Summary of Working Group Meetings and Key Topics Discussed

Meeting Date	Key Topics Discussed
June 25, 2025	• System Pruning Pilot approach – addressing Working Group feedback • IRP incentives – review types of incentive mechanisms • IRP Assessment – presentation on input assumptions and methodology of the demand-side (Enhanced Targeted Energy Efficiency (ETEE) / Demand Response (DR)) IRPA Model

[4] https://engagewithus.oeb.ca/irp

July 30, 2025	• IRP Pilots Update (Southern Lake Huron and System Pruning) • System Pruning jurisdictional scan • IRP Evaluation (Status update, DCF+ results and interpretation, DCF+ update) • IRP Framework Review (Electrification)
September 3, 2025	• IRP Framework Review (Future Role of Working Group)
September 25, 2025	• IRP Shareholder Incentive Mechanism Proposal
October 29, 2025	• Southern Lake Huron Pilot Update (pilot offers, marketing, evaluation, stakeholder engagement, measurement update, evaluation, measurement & verification (EM&V) and data analysis) • IRP Jurisdictional Scan • Stakeholder Update
December 3, 2025	• System Pruning Pilot update

3.1. External Stakeholder Outreach

In November 2025, Enbridge Gas shared a draft of its Fall 2025 IRP Regional webinar slide deck with the Working Group, ahead of the public webinars scheduled for December 1 and December 11, 2025. Working Group members were invited to provide written feedback on the draft materials, which would be considered by Enbridge Gas in finalizing its stakeholder engagement tips and materials; however, no members provided comments, and Enbridge Gas subsequently finalized materials and held the public webinars.

3.2. IRP Evaluation Process

In 2025, Enbridge Gas continued discussions with the Working Group on refining aspects of its IRP evaluation process, and shared results of completed IRP evaluations for a subset of projects selected to illustrate the application of the DCF+ methodology with differing facility cost and demand growth characteristics. The Working Group provided input on two key topics:

- **Improving the methodology and documentation by which energy efficiency IRP alternatives (ETEE and DR measures) are assessed**. Enbridge Gas sought feedback from the Working Group on the methodology and input assumptions of an updated demand-side IRPA regional model, which forecasts IRP participation, costs, and peak demand savings, making use of forecasts and participation data for Enbridge Gas's existing demand-side management (DSM) programs. This model will be used as an input in both the technical evaluation and economic evaluation stages of IRP evaluation going forward. The

model was not shared with the Working Group, but members provided feedback on the inputs and assumptions for Enbridge Gas's consideration. Members raised questions about factors such as: the assumptions involved in forecasting IRP participation based on the previous level of participation in DSM programs, how to predict participation levels that would result from customer incentive levels higher than those previously used, how the accuracy of the model will be assessed and calibrated, and the exclusion of contract customers from the model. Enbridge Gas provided clarification and subsequently made several minor updates to its model based on Working Group input, including adjusting the scaling based on regional consumption and ETEE adoption rates. The issues raised by members have not been fully resolved; Enbridge Gas noted that the model is likely to be refined and improved based on actual IRP project results, including the Southern Lake Huron pilot.

The IRP regional model uses information from and complements the IRP model previously developed by the Posterity Group that has been used by Enbridge Gas at the technical evaluation stage to assess whether an IRP alternative is technically feasible. In response to previous discussions with the Working Group (covered in a previous report), Enbridge Gas has committed to work with the Posterity Group to update and publicly document the methodology for this IRP model. This is expected to provide other interested parties with a better understanding of the modeling approach used in technical potential evaluations.

- **Updated IRP evaluation results of projects in Enbridge Gas's Asset Management Plan (AMP) in 2026, factoring in newly available and relevant information, data, and insights including system reinforcement plan updates.** Summaries of updated evaluation results were shared with the Working Group for questions and comments. A Working Group member noted concerns with the sensitivity of the AMP to the growth forecast, and that many growth projects that were in the previous version of the AMP had been removed from the updated version, highlighting the significant uncertainty associated with the growth forecast. Enbridge Gas noted that changes in the growth forecasts and the associated investment project scopes are a result of many factors, such as updates to customer forecasts/demands/attachments and that projects are progressively refined as projects progress towards their in-service date. Enbridge Gas subsequently provided details on the specific changes to the growth forecast that led to the updated results. The larger issue of how the IRP Assessment process should account for a changing demand forecast remains a concern, and is noted in the OEB staff discussion paper on the IRP Framework review.

3.3. Discounted Cash Flow-Plus Test

In 2025, Enbridge Gas presented IRP economic evaluation (DCF+) results for four new projects to the Working Group. The analysis compared project cost, results of the individual phases, combined Phase 1 and Phase 2 Net Present Value, and relative bill impact between Facility Alternatives and IRP Alternatives. The analysis also looked at whether the demand driving the project need was expected to persist and the timing of the project need, which impacted whether a final decision (Facility Alternative or IRP Alternative) was needed or whether the need could continue to be monitored. The analysis indicated that a Facility Alternative was the preferred alternative for three of the projects, while a supply side IRP Alternative (compressed natural gas) was the preferred alternative for one project. The timing of this system need is not until 2029, so Enbridge Gas will not immediately implement the supply-side IRP Alternative. Enbridge Gas will continue to monitor the system need in the following year and reassess as required, to allow for the possibility of changes to the demand forecast that could impact the system need. Enbridge Gas subsequently noted that compressed natural gas solutions can be deployed in a relatively short timeframe (i.e. deployed within the same year as the required facility in-service date).

Enbridge Gas also used this discussion to provide an update on its perspective on the broader issues the Working Group had identified with the DCF+ test, including concerns regarding the exclusion of carbon costs and the methodology for capturing broader economic impacts through a GDP multiplier. Despite the Working Group's disagreement with the substance of if and how phase 3 societal impacts are captured and how its approach aligns with the OEB's orders, Enbridge Gas maintained that the DCF+ test appropriately reflects economic impacts within the OEB's mandate and that Working Group feedback has been considered.

The next step is for the OEB to review Enbridge Gas's updated DCF+ methodology as part of Enbridge Gas's first non-pilot IRP plan application, which will provide an opportunity for this question to be adjudicated.

3.4. Southern Lake Huron Pilot – Implementation and Evaluation

The 2021 IRP Framework required Enbridge Gas to develop and implement two IRP pilot projects. In July 2023, Enbridge Gas applied to the OEB for approval of two IRP pilot projects, but one of the pilots was later withdrawn. The other pilot, the Southern Lake Huron Pilot, was approved by the OEB on March 27, 2025, with certain modifications. While certain aspects of

the OEB decision have been appealed and are under review, Enbridge Gas has proceeded to implement most aspects of the approved pilot. The pilot was brought to market in 2025 under the name “Sarnia Saves”, offering enhanced customer incentives for energy efficiency measures that reduce peak demand, and a new demand response program for residential customers.

Enbridge Gas provided the Working Group with updates on the pilot for feedback. These updates covered the design and implementation of residential, commercial, and industrial pilot offerings (including lessons learned), evaluation, measurement, and verification of peak savings, marketing plan, and stakeholder engagement.

Progress related to the Pilot’s two primary objectives is summarized below:

Objective 1: Develop an understanding of how ETEE programs and DR programs impact peak hour flow/demand.

- Enbridge Gas selected Dunsky Energy and Climate Advisors as the external consultant to assist in assessing the peak demand impact of the pilot. A draft EM&V plan was expected to be shared with the Working Group for feedback in late 2025, but this was postponed to early 2026.
- Enbridge Gas shared its preliminary in-house hourly load regression analysis approach which will be used as an input to assess peak demand impacts (Dunsky Energy and Climate Advisors are also expected to assess and support the development of this internal tool). The Working Group reviewed and provided comments on Enbridge Gas’s preliminary approach, including which variables to track and suggestions on how to test the tool for reasonableness. The Working Group also recommended collecting and retaining as much data as possible, as it is easier to exclude unnecessary data later than to retroactively collect data related to previously excluded variables.
- Enbridge Gas will take the Working Group’s feedback into consideration in finalizing its approach to data collection and EM&V.

Objective 2: Develop an understanding of how to design, deploy, and evaluate ETEE and residential DR programs.

- Enbridge Gas provided an update on design and implementation of the Southern Lake Huron Pilot (“Sarnia Saves” program), which generally aligns with the project plan outlined in the 2025 IRP annual report but includes minor updates informed by Working

Group feedback. The Working Group provided additional input on marketing and stakeholdering activities and considerations for both residential and commercial pilot offers, as well as tips and considerations on the use of Brightlync meters for hourly data collection. A Working Group member noted concerns about whether an appropriate baseline can be established and whether the pilot's results will be transferable to other systems, given Southern Lake Huron's multi-feed network and limited flow data at the feed points which makes it challenging to quantify system-level benefits.

- Enbridge Gas reported stable and consistent engagement from both residential and commercial customer leads. Given the high interest and early success, Working Group members raised questions about exploring opportunities to expand customer participation, while recognizing the pilot's budget and scope constraints.
- A member of the Working Group served as a representative to review and provide feedback on draft customer survey and interview guides. These tools will then be finalized and used by the program evaluator to gain a better understanding of the experience of those involved in the Southern Lake Huron pilot. Baseline surveys were completed in September 2025. Initial Enbridge Gas staff interviews were conducted in July 2025, followed by delivery agent and energy advisor interviews in December 2025. Residential and commercial participant interviews are expected to take place in 2026.

It is expected that Enbridge Gas will continue to engage with the Working Group to review and provide input on project plan, implementation, and evaluation elements throughout the Southern Lake Huron Pilot.

3.5. System Pruning Pilot and Jurisdictional Scan

As part of the Settlement Agreement for Phase 2 of Enbridge Gas's rebasing application, Enbridge Gas committed to conducting a system pruning pilot (i.e., incenting customers to voluntarily exit the gas system as an alternative to replacing gas infrastructure), with the approach to be developed in consultation with the IRP Working Group. Implementation of one or two system pruning pilots was expected to begin by the end of Q1 of 2026.

Throughout 2025, Enbridge Gas worked closely with the Working Group (and a temporary system pruning subgroup of the Working Group) to refine a draft "approach" document for the system pruning pilot. This work was mostly undertaken in the first half of 2025 and was documented in last year's Working Group annual report.

In late June 2025, the approach document was finalized. It outlines key elements of the pilot including objectives, selection criteria for system renewal projects potentially suitable for system pruning, the customer engagement plan and offers, customer choice (i.e., how the pilot will address circumstances where customers do not want to disconnect from the natural gas system, or wish to reconnect after participation in the pilot), a stakeholder engagement plan, the approach to program delivery, an implementation plan, and evaluation strategy. Proposed revisions to the document were reviewed by the full Working Group in June 2025 with the intent of enabling Enbridge Gas to incorporate member feedback into the plan. While the Working Group did not formally approve the document, it supported proceeding with it as a reasonable initial approach, subject to ongoing review and further Working Group input as the pilot is executed and lessons are learnt. The system pruning approach document was filed by Enbridge Gas with the OEB on July 4, 2025.

To support the development of the system pruning pilot, DNV was engaged as an external consultant to conduct a jurisdictional scan on system pruning. In the first half of 2025, the system pruning subgroup provided extensive feedback to DNV to inform the development of this report. In July 2025, DNV provided the full Working Group with an update on revisions made to the draft jurisdictional scan report in response to member feedback. The report was published in August 2025.

Following the filing of the system pruning approach document, Enbridge Gas continued to bring the pilot closer to implementation, including identifying target project areas and selecting a contractor to deliver the pilot. In July 2025, the Working Group reviewed and provided feedback on a customer outreach pre-screen survey that would be used to gauge customer interest in participating in a system pruning project, including suggestions related to survey language and delivery methods. Enbridge Gas updated the pre-screen survey to incorporate feedback provided by the Working Group, and proceeded with the pre-screen phase of the pilot implementation to a subset of customers in target project areas that met the defined criteria. In December 2025, Enbridge Gas shared the survey results and discussed how the findings would inform field implementation. In response, the Working Group provided feedback on several aspects of the pilot design including customer outreach approach and interpretation of survey results (e.g., cautioning against interpreting non-response as lack of interest), the importance of targeting high-value opportunities (e.g., expanding outreach beyond the initial six interested customers to include one or two neighboring customers or small clusters in parallel with proceeding with the initial participants), consideration of commercial and mixed-use

opportunities, and the value of testing different marketing and outreach methods through multi-modal and repeated engagement. Members also emphasized that messaging should clearly originate from Enbridge Gas to enhance legitimacy and trust and should motivate customers by communicating potential bill impacts or savings, potentially supported by modest financial incentives to increase engagement. Enbridge Gas will proceed to next steps in pilot implementation with the six interested customers, which was supported by the Working Group. Enbridge Gas will also consider the Working Group's suggestions regarding conducting additional outreach, informed by the insights gained through engagement with the six targeted candidates. Working Group feedback noted considerations of increasing pilot participant numbers to improve the likelihood that the pilot will provide meaningful learnings.

3.6. Non-Pilot IRP Plan Policy Proposals – Incentive Mechanisms

In 2023, the Working Group discussed IRP policy proposals related to attribution of savings between Demand-Side Management programs and IRP Plans, shareholder incentives and performance metrics, IRP Deferral Accounts, and management of risk associated with IRP implementation. At the time, Enbridge Gas expected to consider perspectives of the Working Group and then file proposals on these topics for the OEB's consideration as part of Enbridge Gas's first non-pilot IRP plan. Enbridge Gas did not have a viable non-pilot IRP plan application to file with the OEB in 2024, and so other topics took priority and these policy discussions with the Working Group were put on hold in 2024. However, the Phase 2 rebasing settlement approved by the OEB in November 2024[5] established a new commitment for Enbridge Gas to file an application that includes a proposal and request for approval of an IRP incentive mechanism by the end of November 2025, resulting in the discussion on shareholder incentives resuming.

In June 2025, Enbridge Gas provided the Working Group with a recap of the incentive discussions that took place in 2023, highlighting the pros and cons of each of the types of incentive mechanism discussed. Enbridge Gas then shared its initial findings on how shareholder incentive mechanisms are used in other jurisdictions. The Working Group noted that the analysis to date may not sufficiently consider the level of incentive required to meaningfully motivate Enbridge Gas's shareholders to pursue IRP alternatives instead of traditional rate-base-eligible infrastructure. Acknowledging the conceptual goal of aligning shareholder interests with prudent IRP outcomes, some Working Group members expressed

[5] Decision on Settlement Proposal and Interim Rate Order, November 29, 2024, EB-2024-0111

skepticism that the OEB would ever approve an IRP incentive mechanism that provides returns comparable to those available through rate-basing capital investments.

In September 2025, Enbridge Gas brought the Working Group a specific incentive proposal for discussion. Under this proposal, Enbridge Gas would capitalize the O&M costs of an IRP Plan and incorporate a shared savings mechanism to retain some of the cost savings of the IRP Plan relative to the traditional facilities investment. A Working Group member noted that the choice of a shared savings mechanism is aligned with the IRP Framework's emphasis on cost-effectiveness testing and prioritizes cost savings from IRP. However, Working Group members noted several concerns with the specific incentive design, e.g., questioning the premise that the return to shareholders needs to be the same for an IRP Alternative as for a higher-cost Facility Alternative (i.e., a traditional infrastructure solution), noting that the percentage of savings retained by the utility is lower in some other jurisdictions that use a shared savings mechanism, and noting the risk that Enbridge Gas may overstate the expected cost of a traditional solution in order to be eligible for a larger incentive.

On November 4, 2025, Enbridge Gas filed its IRP incentive mechanism application (which was based on the incentive proposal discussed with the Working Group) but requested that the application be put in abeyance until the outcome of the IRP Framework Review proceeding is known. On December 22, 2025, the OEB granted the request, and the application remains in abeyance.[6]

3.7. IRP Framework Review

In March 2025, the OEB announced that it was initiating a consultation to review the IRP Framework. As part of the consultation, the OEB noted that it would consider several key items including:

- How the Framework would be best constituted to allow for broad, flexible implementation that can adapt at a pace that supports innovation,
- The OEB's expectations and approach to oversight of innovation-related IRP proposals,

[6] EB-2025-0292

- Expectations for natural gas distributors regarding electrification as an IRP alternative, including how electricity availability issues should be considered if electrification is being proposed as an IRP alternative, and
- Opportunities to improve the effectiveness and efficiency of the Framework.

OEB staff consulted with the Working Group to inform development of OEB staff's IRP Framework Review discussion paper. In the first half of 2025, the Working Group discussed the purpose and form of the IRP Framework, the approach to technical evaluation of the viability of IRP alternatives, and how the Framework should address innovation. In July and September 2025, the Working Group continued its IRP Framework Review discussions, focusing on the role of electrification, the proposal for a 3-year adjudicated IRP implementation plan, and how the role of the IRP Working Group would evolve with the framework.

Regarding electrification, Working Group members shared a variety of differing views on its appropriate role within IRP. Members generally envisioned electrification as one IRP alternative to be considered when seeking to address a system need. However, there was some concern with the idea of Enbridge Gas acting as the gatekeeper or delivery agent for electrification initiatives due to potential conflict of interest. Some members proposed the IESO or local electric utilities should lead electrification efforts with Enbridge Gas advancing gas infrastructure where electrical options are insufficient. Enbridge Gas emphasized that the IRP Framework is intended to be neutral and cautioned against perceived bias toward IRP alternatives over traditional gas infrastructure. Enbridge Gas noted there is a need for full comparisons of all ratepayer costs, as well as consideration of policy guidance in the Integrated Energy Plan on the future role of natural gas, while some members noted that existing cost analyses may understate select gas infrastructure-related costs such as costs associated with carbon emissions and stranded asset risk.

Regarding the proposal for an IRP implementation plan to be adjudicated every 3 years with annual informational updates, some Working Group members supported this approach as a way to create clearer accountability (through adjudicative oversight), while providing flexibility in the Plan approval for a more nimble approach to make program changes in the years between adjudication. Another member favored a more frequent rolling plan with some adjudicative oversight each year to enhance forward-looking transparency, cautioning that greater procedural flexibility must be balanced with safeguards to address ratepayer concerns and ensure front-end oversight rather than reliance on after-the-fact prudence reviews.

Discussion on the role of the IRP Working Group reflected Working Group member concerns about the Working Group's limited influence and impact under the current IRP Framework, underscoring the need for adjudicated processes to drive accountability. Various members observed that Enbridge Gas appears to determine its preferred IRP direction internally then seeks Working Group input selectively, which, while useful, falls short of a fully collaborative process. Some members noted that slow progress on IRP is driven more by the absence of clear and supportive policy direction that creates a strong business case or policy rationale for IRP, rather than by any shortcoming of the Working Group's role or processes.

In October 2025, OEB staff released a staff discussion paper with proposals for updating the IRP Framework, informed by the input previously provided by the Working Group.

Appendix F: IRP Assessment Screening and Evaluation Guidelines

IRP Assessment Screening and Evaluation Guidelines

Version Date: 2026

Introduction

This document outlines the IRP Assessment Screening Criteria and rationale used in the IRP Evaluation process and is updated on an annual basis to reflect process updates and learnings gained through the year. Previous versions were filed in past IRP Annual Reports, as well as at EB-2022-0200, JT 5.36 Attachment 2 and examples of the detailed technical evaluation form can be found at EB-2022-0220, JT 5.36 Attachment 3 and 4.

On an annual basis, Enbridge Gas files an Asset Management Plan ("AMP") or AMP Addendum. To ensure the most optimal facility alternative is included in the AMP, and prior to the IRP assessment process, Enbridge Gas routinely considers a wide range of traditional facility alternatives when conducting project scoping of facility needs, where applicable. Investments are subsequently reviewed as part of the Asset Investment Planning & Management ("AIPM") process for IRP alternatives ("IRPAs") which are assessed against the project scope where traditional facility alternatives have already been considered. This process can be iterative due to the dynamic nature of facility planning and changes to demand forecasts. Therefore, project scopes for both traditional and IRP alternatives may require reassessment to ensure the most up to date information is captured.[57]

The IRP Assessment Screening and Evaluation criteria described in this document are conducted using the direction and guiding principles provided by the OEB in its IRP Decision and Order (EB-2020-0091). The investments considered as part of this binary screening and technical screening and evaluation process include investments within the AMP and are limited to regulated Enbridge Gas investments. In future AMP investment assessments, Enbridge Gas will systematically apply these learnings to allow focus on the geographic areas and investment types that are most likely to yield an IRP Plan that is both technically and economically feasible.

IRP Assessment Process Overview

1. **Initial Screening**
   The evaluation process began with removing non-gas-carrying asset investments from the list of AMP Addendum 2026 investments that would proceed to the binary screening phase.

2. **Binary Screening**
   Investments are screened out as per Section 5.2 of the IRP Framework. Investments under the Asset Class of Customer Connections are also screened out as part of Binary Screening.

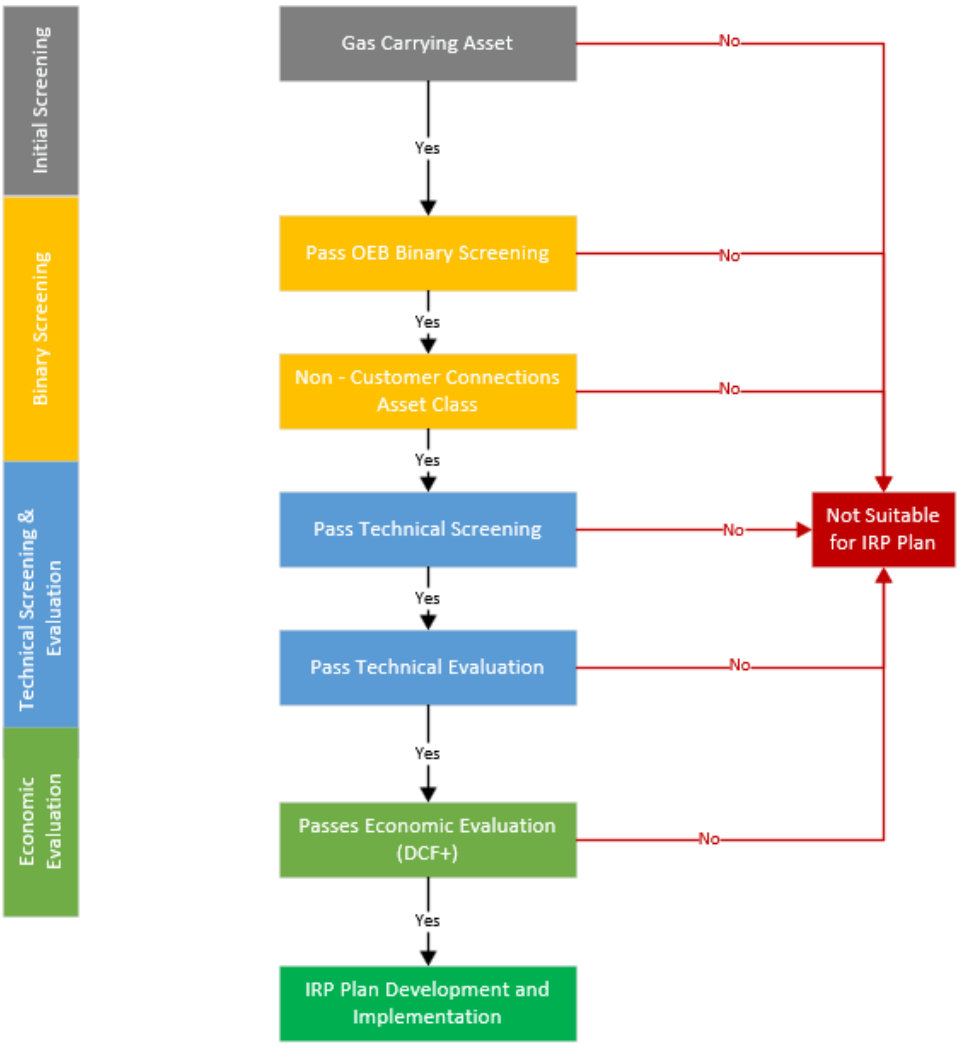
3. **Technical Screening & Evaluation**
   Investments undergo an initial technical screening to determine whether a detailed technical evaluation is required.

   Investments that have passed technical screening will be evaluated for whether an investment could have a technically feasible IRPA(s). To assess the technical potential of IRPAs to meet a system need, Enbridge Gas calculates the required demand reduction and/or incremental supply by determining the difference between the required and current system capacity. Where IRPAs have the technical potential to offset the required capacity through either a reduction in the design hour/day demand or incremental supply within the required timeframe to address the system constraint, and without compromising the safety and reliability of the system, these investments pass the technical evaluation.

4. **Economic Evaluation**
   Investments that have passed technical evaluation will be economically evaluated using the DCF+ test. The DCF+ test compares each technically feasible IRPA and the identified baseline facility project to a 'do nothing' scenario. The DCF+ results for the IRPAs and the baseline facility alternative are then compared to one another to determine the optimal alternative or combination of alternatives to meet the system need. If it is determined that the most optimal option includes one or more IRPAs, an IRPA Plan will be developed where applicable.

[57] IRP Annual Report, Section 7, Table 7.1 provides a "Summary of Facility and IRP Alternatives"

Figure 1 – IRP Assessment Flow Chart



Initial Screening

Ahead of the binary screening, investments in non-gas carrying assets were removed. These investments are in the "Real Estate & Workplace Services", "Fleet & Equipment", and "Technology & Information Services" asset classes.

Binary Screening

All remaining investments are subject to the binary screen criteria as provided by the OEB. Investments that satisfy the binary screening criteria were removed from further evaluation.

- ***Investments deemed Emergent Safety Issue***
  "If an identified system constraint/need is determined to require a facility project for Enbridge Gas to offer safe and reliable service or to meet an applicable law, an IRP evaluation is not required. An example of such a system constraint/need, and an emergent safety issue, would be if an existing pipeline sustained unanticipated damage and needed to be replaced as quickly as possible to ensure the safety of local communities and Enbridge Gas's broader transmission and distribution systems.

Longer-term safety related system constraints/needs may be appropriate for an IRP Plan and should be considered on a case-by-case basis".[58]

- ***Investments failing based on Timing***
  "If an identified system constraint/need must be met in under three years, an IRP Plan could not likely be implemented and its ability to resolve the identified system constraint could not be verified in time. Therefore, an IRP evaluation is not required. Exceptions to this criterion could include consideration of supply side IRPAs and bridging or market-based alternatives where such IRPAs can address a more imminent need".[59]

- ***Investments failing based on Cost ($) Threshold***
  "If a facility project is being advanced for replacement or relocation of a pipeline and the cost is less than the minimum project cost that would necessitate a Leave to Construct approval, then an IRP evaluation is not required".[60] On September 24,2024, the OEB released new Filing Requirements applicable for exemption on hydrocarbon line projects that cost between $2M and $10M, where information on project need and alternatives are not required.[61] The new exemption requirements for facility projects with costs between $2M and $10M are considered a legislative change and thus, does not impact the Binary Screening cost threshold. Therefore, Enbridge Gas continues to apply a cost threshold of $2M to screen replacement or relocation projects out at this stage, as well as any associated main replacement/relocation programmatic spend.

- ***Customer-Specific Build***
  "If an identified system constraint/need has been underpinned by a specific customer's (or group of customers') clear request for a facility option and either the choice to pay a Contribution in Aid of Construction or to contract for long-term firm services delivered by such facilities, then an IRP evaluation is not required".[62]

- ***Community Expansion & Economic Development:***
  "If a facility project has been driven by government legislation or policy with related funding explicitly aimed at delivering natural gas into communities, then an IRP evaluation is not required."[63] As noted in the AMP[64], Community Expansion and Economic Development projects are not included in the AMP and therefore no associated IRP evaluation is conducted.

Additionally, investments with the asset class of "Customer Connections" will be screened out at the Binary Screening stage. *Customer Connection-related projects are required to serve new customers connected in accordance with guidelines of EBO 188. The OEB concluded that as part of the first-generation IRP Framework it is not appropriate to provide funding to Enbridge Gas for electricity IRPAs.*

The investments in the customer connections asset class are related to costs associated with serving new customers, including materials and installation of distribution mains, services and regulating equipment. Enbridge Gas determined that implementing an IRPA could not reduce the size of the assets, as these cannot be further downsized. In addition, there are no non-gas IRPAs available within the current IRP Framework that can be offered to avoid the customer connection service being requested. Therefore, investments under this category should be screened out through the binary screening phase, in advance of technical evaluations. It should be noted that any associated main reinforcement investments are still subject to the binary screening and technical evaluation process.

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[58] EB-2020-0091 Decision and Order, Integrated Resource Planning Proposal, July 22, 2021, p. 47
[59] EB-2020-0091 Decision and Order, Integrated Resource Planning Proposal, July 22, 2021, p. 48
[60] EB-2020-0091 Decision and Order, Integrated Resource Planning Proposal, July 22, 2021, p. 49
[61] EB-2024-0233 Correspondence, OEB Filing Requirements LTC Exemption Applications
[62] EB-2020-0091 Integrated Resource Planning Proposal, Decision and Order July 21, 2021, p. 44.
[63] EB-2020-0091 Integrated Resource Planning Proposal, Decision and Order July 21, 2021, p. 48.
[64] EB-2022-0200 Exhibit 2, Tab 6, Schedule 2, p. 282

Technical Screening and Evaluation

As per the OEB Decision, system needs progressing past the IRP binary screening will proceed through to a technical evaluation. The technical stage of the IRP Assessment Process is comprised of two components: technical screening and technical evaluation. This stage is intended to assess the technical viability of IRPAs to eliminate, reduce or defer the project scope.

As Enbridge Gas progressed to the Technical Evaluation stage of the IRP framework, it became evident that that not all investments passing Binary Screening required a detailed technical evaluation due to the nature of the project scope. A detailed technical evaluation involves network modelling of customer demands, demand reductions and/or incremental supply required to meet system needs. This is a rigorous and time-intensive process that would not be applicable to investment categories outlined in Table 1 below.

To reflect this distinction, the "Technical Evaluation" stage within the IRP Assessment Process has been updated to "Technical Screening and Evaluation," as shown in Figure 1. Enbridge Gas has discussed and reviewed the Technical Screening and Evaluation Process with the TWG, incorporated the feedback received and will continue to engage with the TWG to support ongoing refinement of the IRP Assessment Process.

Enbridge Gas has undertaken detailed technical project review of these investments, including initial verification of the forecasted need(s), project cost(s) and project driver(s). Through this process, certain categories and investment types were identified in which IRPAs would not be considered effective. The categories and rationale are described below and in Table 1. These investments are systematically screened out during the initial IRP technical screening process and these categories will be refined and updated to reflect any changes in the screening and evaluation process.

Concurrently, in 2023, the Enhanced Distribution Integrity Management Program ("EDIMP") was approved and established. As EDIMP pipelines undergo review and assessment, there may be changes to the scope and timing of the projects currently listed in the AMP, which in turn could affect the subsequent IRP analysis. These projects will be reviewed closely to ensure technical evaluation is completed on the updated scope.

Technical Screening

As noted above, Enbridge Gas identified categories of investments that do not have a technically feasible IRPA and subsequently screened them out at the technical screening stage. The categories of projects, their corresponding technical screening commentary and rationale are listed below.

Compressor Stations

- Technical Screening Comment: *Compression Station related projects are required to maintain existing capacity, deliverability and throughput. This is necessary to maintain security of supply and stable natural gas pricing during supply disruptions.*

The investments in the compression stations asset class related to the maintenance of the existing fleet of compressors include the periodic original equipment manufacturer ("OEM") prescribed overhauls and replacement of components that are not performing as intended or are obsolete. These types of investments cannot be offset by IRPAs and therefore will be screened out during technical screening. However, any investments driven by growth would be subject to the detailed technical evaluation process.

Hydrogen Blending

- Technical Screening Comment: *Hydrogen related projects are required as no IRPAs can replace the hydrogen feasibility assessments and hydrogen blending initiatives.*

The investments in the hydrogen blending asset class/program are related to the use of hydrogen in the distribution system, studies on hydrogen blending and are focused on reducing the carbon footprint of the existing transmission and distribution system. These investments cannot be offset by IRPAs and therefore will be screened out during technical screening.

Storage Pools & Wells

- Technical Screening Comment: "*Storage Pools & Well related projects are required to maintain existing capacity, deliverability and throughput. This is necessary to maintain security of supply and stable natural gas pricing during supply disruptions."*

The investments in the storage pools and wells asset class are related to maintenance and compliance driven upgrades to allow for ongoing deliverability from the storage pools. This includes the drilling of observation wells for compliance reasons and work that arises annually from the Integrity Management Program. These investments cannot be offset by IRPAs and therefore will be screened out during technical screening.

Distribution Stations

- Technical Screening Comment: *Distribution Station condition related, IRPAs not applicable*

The investments in this category are related to distribution station projects driven by the condition and not by growth. These distribution station condition related projects are prioritized based on inspections that evaluate the condition of various components (regulators, valves, piping, etc.) and systems (heating, odourant, communications, etc.) at the stations. In some instances, the specific projects are time constrained and low in dollar value and would fail at the binary screening stage. For larger projects, an understanding of the impact on upstream and downstream facilities is required and "like for like" replacement is usually preferable – particularly if a full station replacement is not being planned. As such, all condition related station rebuilds, and replacements will be screened out during technical screening. However, any station investments that involve an element of growth would be subject to the detailed technical evaluation process.

CNG Facilities

- Technical Screening Comment: *See investment description – IRPAs not applicable for CNG*

These investments are related to the ongoing replacement and upgrade of CNG facilities to fuel Enbridge Gas's natural gas vehicles. These needs cannot be replaced through IRPAs, and therefore will be screened out during the technical screening.

Other

- Technical Screening Comment: *See investment description, IRPAs not applicable*

The investments in this category were determined that there would not be a technically feasible IRPA and are described below in Table 1.

Project Status/ Timing Related

Technical Screening Comments:

- *A Leave to construct regulatory process has received OEB decision for approval of proposed project scope.*
- *LTC regulatory process in progress*
- *N/A - Project in construction phase*
- *N/A - Investment Cancelled*
- *N/A - Project Completed*

Investments that fall within this category are those that are already under construction, already granted leave to construct by the OEB or are projects that have been cancelled. These investments will be screened out during technical screening.

Table 1 – Description of Investments Screened out at the IRP Technical Screening Stage

	Sub-category	Asset Class	Asset Program	Description
1	AMI Pilot	Utilization	UTIL-Monitoring Systems	The AMI Pilot will establish the technical and economic benefits related to the installation of AMI meters and associated infrastructure. No technically feasible IRPA's can replace this spend.
2	AMP Fitting	Distribution Pipe	DP-Service Relay	An AMP fitting is a mechanical fitting installed between 1969 and 1984, on below ground residential gas service lines, to transition from a plastic service line to a copper riser. Locations with an AMP Fitting are identified annually and prioritized based on risk.
3	Class Location	Distribution Pipe & Transmission Pipe & Underground Storage	DP-Class Location TPUS-Class Location	This is one of the Integrity Management Programs in which the spend is held in a Programmatic spend budget to cover specific projects that are identified each year. Class locations projects arise when a facility needs to be relocated because of increased development and associated population density around the facility. The programmatic spend cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation.
4	Compression Stations	Compression Stations	All	See section above on Compression Stations
5	Corrosion	Distribution Pipe	DP-Corrosion	This programmatic spend covers the replacement of depleted anodes, work arising from bridge crossing inspections, and repairs to rectifier beds.
6	Depth of Cover Program	Transmission Pipe & Underground Storage	TPUS-Integrity	This programmatic spend budget is for facilities that are identified each year as exposed or shallow leading to an increased risk of 3rd party damage. Once identified the pipeline must be lowered, replaced, or otherwise protected to control risk. The programmatic budgeted here cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation.
7	District Station	Distribution Stations	DS-Station Rebuilds & B & C Stations	These investments hold budget for specific station rebuild investments that have been identified through annual inspections and that have been prioritized for rebuild based on condition.
8	Farm Taps	Utilization	UTIL-Regulator Refit	This is programmatic spend that is budgeted to cover the costs of remediating situations in which there are problems with the first or second cut of the regulation at a customer's premise.

9	Facilities Integrity Management Program (FIMP)	Distribution Stations	DS-Integrity	This is programmatic spend that is budgeted to cover the costs of large station inspections that must be completed annually to scope the extent of work that is required at each large station investment identified in the AMP. The programmatic spend cannot be assessed for IRPAs, however, any identified facility replacements where growth is a project driver will be included in the IRP Technical Evaluation
10	Fire Suppression	Distribution Stations	DS-Gate, Feeder & A Stations	These investments relate to the installation of Fire Suppression at Distribution Stations with Odourant. Going forward all such Station programs that are driven by condition, end-of-life, and compliance will be removed from IRP Technical Evaluation.
11	Geohazard	Distribution Pipe	DP-Integrity	This integrity management programmatic spend is budgeted to cover the costs related to identifying pipelines that must be replaced because of risks related to geohazards. The programmatic spend cannot be assessed for IRPAs, however, any resulting pipeline replacements will be included in the IRP Technical Evaluation.
12	Independent Asset Integrity Review (IAIR)	Distribution Pipe & Transmission Pipe & Underground Storage	DP-Integrity, TPUS-Integrity	This is programmatic spend that is budgeted for work that results from the Independent Asset Integrity Review. The programmatic spend budgeted cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation.
13	Integrity Digs	Distribution Pipe & Transmission Pipe & Underground Storage	DP-Integrity, TPUS-Integrity	This programmatic spend is budgeted to cover the costs related to repairs and replacements that are identified through in-line inspections. The programmatic spend cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation
14	Integrity Retrofit	Distribution Pipe, Distribution Stations & Transmission Pipe & Underground Storage	DP-Integrity, DS-Integrity, TPUS-Integrity	This is programmatic spend that is budgeted for installing pig launchers and receivers, allowing annual in-line inspection to be accomplished more easily and the life of transmission pipelines to be potentially extended. This work takes place at stations and does not affect the distribution system itself.
15	Inside Room Regulators (IRR)	Distribution Stations	DS-Inside Regulator & ERR Program	This is programmatic spend that is budgeted for remediation of inside regulation sets based on risk.

16	Large stations	Distribution Stations	DS-Gate, Feeder & A Stations	These stations are identified through inspections and prioritized for rebuild based on condition. Each year, this programmatic spend is converted into specific projects. Any identified investments where growth is a project driver will be included in the IRP Technical Evaluation. It should be noted that there is also the possibility that reduced load will drive some investment in stations.
17	Liquified Natural Gas (LNG)	LNG	All	These investments relate to the maintenance of the Hagar LNG facility that is used to peak shave the load in the Sudbury area. Unless driven by Growth, all investments at the Hagar facility will be excluded from the Technical Evaluation moving forward.
18	Low Pressure Delivery Meter Sets (LPDMS)	Utilization	UTIL-Remediation	This is programmatic spend budgeted to cover the inspection and remediation of Low-Pressure Delivery Meter sets, which are usually at commercial customer locations.
19	Main & Service Repl - Leaking	Distribution Pipe	DP-Service Relay	Similar investments in the EGD Rate Zone were excluded at Binary Screening and going forward these too will be excluded at Binary Screening as Emergent Safety Issue. Aside from the safety concern, leaks must be addressed quickly to avoid GHG's.
20	Meter exchanges	Utilization	UTIL-Regulator Refit	This programmatic spend is budgeted to cover the costs of replacing meters through the Measurement Canada approved processes.
21	Maximum Operating Pressure (MOP) Verification	Distribution Pipe & Transmission Pipe & Underground Storage	DP-Replacements, TPUS-Replacements	This programmatic spend is budgeted to cover the replacement of pipelines where this may be required because of a review of records for pipeline systems operating above 30 per cent SMYS. Once the MOP has been identified and based on the associated risk, the pressure in these pipelines may need to be reduced until the pipeline can be replaced. The programmatic spend cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation.
22	Odourant Program	Distribution Stations	DS-Gate, Feeder & A Stations	These investments are for the upgrade of odourant systems at stations.
23	Pressure Factoring Metering (PFM) Program	Stations	DS-Station Rebuilds & B and C Stations	This programmatic spend is budgeted to cover the costs of PFM stations that require a bypass.
25	Relocation Program	Distribution Pipe	DP-Relocations	This programmatic spend has been budgeted to cover the costs of projects that are identified annually in response to the requirements of municipalities and other agencies. The programmatic spend cannot

				be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation
26	Remote Terminal Units (RTU)	Distribution Stations	DS-Gate, Feeder & A Stations	These investments are for the replacement of Remote Terminal Units that are no longer supported by the manufacturer.
27	Storage Facility	Transmission Pipe & Underground Storage	TPUS-Improvements	As noted above, investments related to Storage Pools and Wells will be excluded from Technical Evaluation going forward unless they are driven by growth.
28	Telemetry	Distribution Stations	DS-Gate, Feeder & A Stations	These investments are for telemetry at distribution stations.
29	Vintage Steel Main (VSM)	Distribution Pipe	DP-Replacement	There is a programmatic spend budgeted for Vintage Steel Main projects that have not yet been identified. The programmatic spend cannot be assessed for IRPAs, however, any identified pipeline replacements will be included in the IRP Technical Evaluation.
30	Well Laterals	Transmission Pipe & Underground Storage	TPUS-Integrity	As noted above, investments in Storage Pools & Wells, and their associated Integrity Management Programs will be similarly excluded from Technical Evaluation.

Technical Evaluation

Investments that are not screened out through the technical screening, as noted above, proceed to a technical evaluation. Examples of the technical evaluation form can be found at EB-2022-0200, JT 5.36 Attachment 3 and 4.

During the technical evaluation, Enbridge Gas assesses the technical feasibility of the following IRP alternatives (IRPAs):

- Supply-side alternatives:
    - Compressed Natural Gas ("CNG"): Consideration of CNG injection volumes, the number of years of CNG, location of CNG injection, and the subsequent impact to project scope
    - Market-based supply: Consideration of the presence of a third-party source in the project area-of-benefit, the availability of higher pressure or increased capacity, and the subsequent impact to project scope
- Demand-side alternatives:
    - Enhanced Targeted Energy Efficiency ("ETEE"): Consideration of the level of peak demand reduction required, the level of peak demand achieved by ETEE, the number of years of ETEE, the amount of firm contracted demand on the system and potential reduction, and the subsequent impact to the project scope.
    - Demand Response ("DR"): Consideration of the level of peak demand that can be shifted through DR, and the subsequent impact to the project scope

The following are the types of technical evaluation commentary associated with investments with technically feasible IRPAs.

IRPA(s) applicable – IRPA(s) applicable could defer, reduce or eliminate project scope

These investments pass the technical evaluation as there are technically feasible supply or demand side IRPA(s) that could impact the project scope. These investments proceed with detailed system modelling for peak hour demands.

The following are the types of technical evaluation commentary associated with investments with no technical feasible IRPAs. These investments will be excluded from further detailed technical evaluation.

Scope is NPS 2, cannot downsize further or retire

The existing scope is already NPS 2 and thus cannot be further downsized. These investments were then reviewed to determine whether they could be retired. These scopes had services coming off the pipe that needed to be maintained and thus cannot be retired. Since the pipe size cannot be reduced beyond NPS 2 and cannot be eliminated, IRP has no impact on the project scope and therefore fails technical evaluation.

Potential to be downsized to NPS 2. Further assessment closer to ISD

During technical evaluation, it was determined that the project scope could potentially be replaced with NPS 2 prior to any IRP assessment. If the pipe size can be reduced, then IRP will not be applicable; the scope will be confirmed when the project enters the detailed design phase.

Timing – Market Based Supply Side not available

Some investments failed because they are required in the near term (1-3 years) and there is no technically feasible supply-side alternative that can meet the need.

Economic Evaluation

Investments that pass the technical evaluation proceed to the economic evaluation stage, where a three-phase DCF+ test is conducted to assess the cost effectiveness of IRP and facility alternatives. While there is a strong emphasis on the rate impact from the DCF+ Phase 1 test, additional factors are taken into consideration to determine the selection of the optimal alternative.

The key considerations to assess cost effectiveness includes:

- Phase 1 NPV results from the DCF+ (Relative Rate Perspective)
  - The Phase 1 DCF+ calculates the benefits and costs for existing ratepayers and reflects the utility perspective by assessing the impact on future utility rates

  Phase 1 + 2 NPV results from DCF+ (Total Customer Perspective)
  - The combined Phase 1 and Phase 2 DCF+ results reflect the total Enbridge Gas customer perspective, by assessing the impact to existing ratepayers and participants, reflecting the entire customer base's economic impacts.

- Combined Project Capital and O&M Cost
  - Alternatives are compared to determine the lowest cost alternative based on the combined project capital and O&M costs and the lowest relative bill impact.

- Persistence of Demand
  - The underlying demand profile driving the capacity constraint is reviewed to ensure the most cost-effective alternative is aligned with project needs. The demand forecast profiles typically fall within the following patterns:
    - Demand is forecast to continue increasing over the period
    - Demand is forecast to increase in the short term and then decline
    - Demand is forecast to increase in the short term and then stabilize

Enbridge Gas determines the preferred alternative by selecting the option with the highest Phase 1 NPV. This preferred alternative is further validated by comparing it with the combined Phase 1 + Phase 2 NPV results. In Enbridge Gas' experience, the preferred alternative is consistently supported by both Phase 1 and Phase 1 + Phase 2 results.

To inform decision thresholds and test robustness, single-variable cost sensitivity analyses on O&M and capital expenditures will be conducted. These analyses will determine the cost shift required for the other alternatives to achieve parity on Phase 1 NPV with the preferred alternative.

The final selection of the optimal alternative reflects a balance of considerations, including Phase 1 NPV results supplemented by consideration of the Phase 1+2 NPV results, the cost-effectiveness differential between alternatives, the forecasted demand profile, total project costs, relative customer bill impacts, while also taking into account the single-variable cost sensitivity analysis.

Following this determination, investments for which an IRP alternative is identified as the optimal solution will advance to the IRP Plan development[65] or implementation stage, or continue to be monitored and reviewed annually to confirm the IRP alternative remains the optimal solution, based on their respective lead times. Conversely, investments for which a facility alternative is deemed optimal will either proceed with the implementation of the facility alternative or continue to be monitored and reviewed annually to confirm the facility alternative remains the optimal solution.

[65] IRP Plan filing with OEB is only applicable for investments greater than $2M.

Appendix G: SLH Evaluation, Measurement and Verification Plan



Evaluation, Measurement, and Verification Plan

Southern Lake Huron (SLH) Integrated Resource Planning (IRP) Pilot

Prepared for:

Enbridge Inc.

April 2026

dunsky Energy + Climate

Submitted to:



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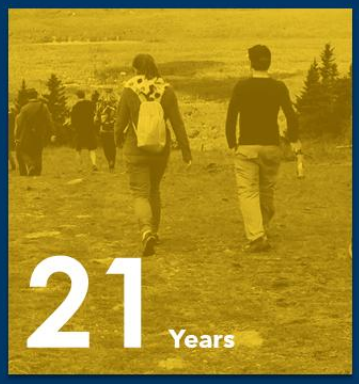


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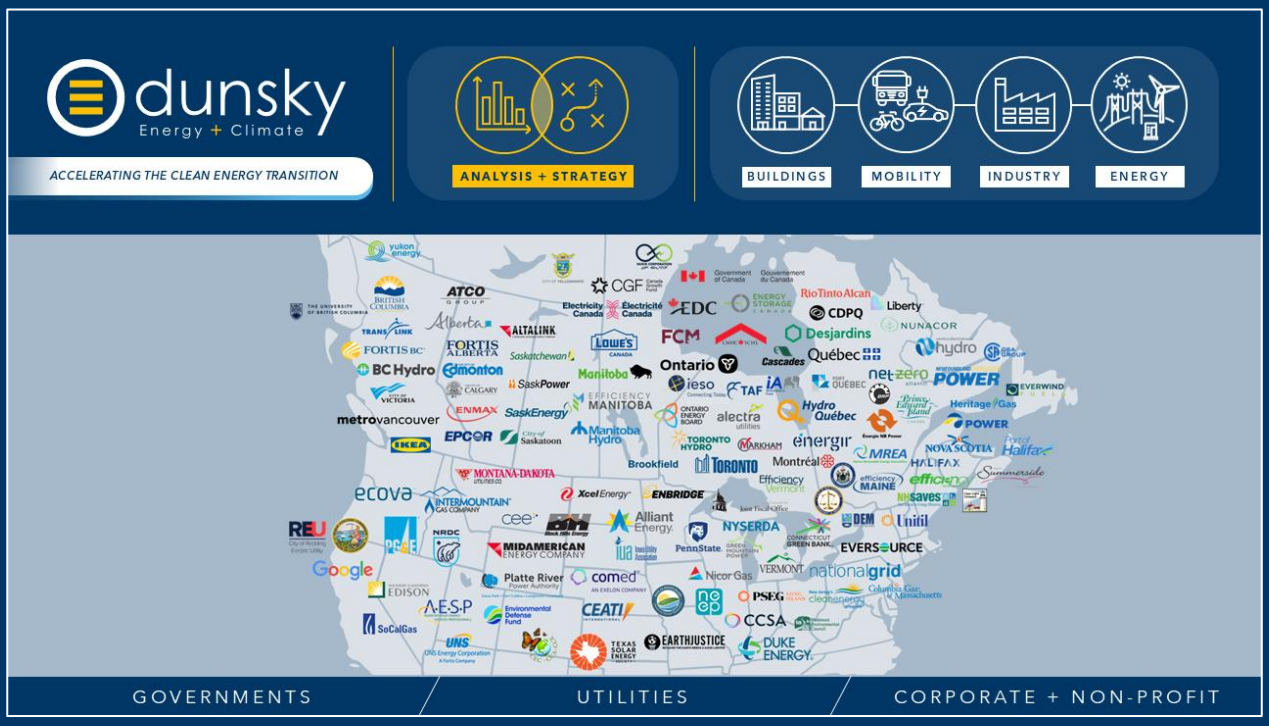






Dunsky supports leading governments, utilities, corporations and others across North America in their efforts to accelerate **the clean energy transition**, effectively and responsibly.

With deep expertise across the Buildings, Mobility, Industry and Energy sectors, we support our clients in two ways: through rigorous **Analysis** (of technical, economic and market opportunities) and by designing or assessing **Strategies** (plans, programs and policies) to achieve success.



Dunsky is proudly Canadian, with offices and staff in Montreal, Toronto, Vancouver, Ottawa and Halifax. Visit dunsky.com for more information.

Executive Summary

The Southern Lake Huron (SLH) Integrated Resource Planning (IRP) Pilot is Enbridge Gas' first large-scale effort to measure whether demand-side Integrated Resource Planning Alternatives (IRPAs), specifically Enhanced Targeted Energy Efficiency (ETEE) and Demand Response (DR), can provide significant measurable reductions in peak hour natural gas demand and support system planning under the OEB's IRP Framework. With approximately 30,000 customers across a representative mix of residential, commercial, and industrial segments, the SLH region provides a strong test case for evaluating these alternatives.

This Evaluation, Measurement, and Verification (EM&V) Plan outlines the methods, data sources, analytical procedures, and reporting structure that will guide the independent evaluation of the SLH IRP Pilot. Developed to fulfill the OEB's direction and Enbridge's IRP Pilot commitments, the EM&V Plan provides a transparent, rigorous, and replicable framework to determine the extent to which ETEE and DR measures can reduce peak hour loads and contribute to system reliability under design-day conditions.

Evaluation Objectives

The evaluation focuses on enabling Enbridge to develop a clear understanding of how ETEE and DR programs impact system peak hour demand. Specifically, the evaluation will:

- Quantify actual peak-hour flow reductions (m^3/h) from ETEE and DR by comparing pre- and post-program load.
- Assess DR event performance, including the reliability, magnitude, and persistence of customer response.
- Identify factors that influence achieved impacts (weather, building characteristics, measure types).
- Extrapolate observed impacts to design-hour conditions using Enbridge's regression methods.

These findings will support future IRP Plans by improving assumptions, refining modeling techniques, and informing the feasibility of using demand-side IRPAs in lieu of traditional system reinforcement projects.

Evaluation Methodology

The evaluation applies a set of coordinated analytical approaches to estimate program impacts.

- Load-vs-temperature regression to measure normalized pre/post load changes and validate Enbridge's regression approach.
- Participant vs non-participant comparisons using hourly interval meter data.
- DR event analysis using smart thermostat telemetry matched to consumption records.
- Impact disaggregation by customer type and measure where statistically reliable.
- Load curve analysis to examine peak shifting, rebound effects, and system-level peak relief.

As part of this approach, customer demand extrapolation will be led by Enbridge, with Dunsky providing methodological review and collaboration. This collaborative approach enables the evaluation to leverage Enbridge's deep expertise in system design, demand

profiling, and historic Ontario design-day practice, while also incorporating Dunsky's experience in demand response, regression-based load modeling, and large dataset evaluation.

All analyses will incorporate rigorous data validation and transparency regarding uncertainty levels, underlying assumptions, and extrapolation techniques. The evaluation relies on hourly meter data, weather data (temperature, wind), smart thermostat event records, and program tracking datasets.

Evaluation Timeline and Deliverables

The evaluation is structured across two heating seasons. Key deliverables include:

- **Draft EM&V Plan** – January 2026.
- **Final EM&V Plan** – March 2026.
- **Interim Report** – Q3 2026, based on the first full winter of data and initial impact results.
- **Final Evaluation Report** – mid-2027, integrating both years of results and full system-level analysis.

Ongoing data requests, regression quality assurance, and periodic updates to Enbridge staff will ensure continuous alignment throughout the evaluation process.

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1. Pilot Background

Enbridge Inc. (Enbridge) has developed and is implementing an Integrated Resource Plan (IRP) pilot in the Southern Lake Huron (SLH) region to evaluate the impact of Integrated Resource Planning Alternatives (IRPA) on the local system peak hour. An IRPA is a potential solution other than a Facility Alternative considered in Enbridge Gas' IRP Assessment Process in response to a specific system need of Enbridge Gas[1].

investments or activities that provide utilities with an opportunity to reduce system costs, emissions, and customer risk by offering cost effective alternatives to infrastructure investment.

In July 2021, the Ontario Energy Board (OEB) issued the first Integrated Resource Planning (IRP) Framework to shape the process to compare and evaluate IRP alternatives for natural gas system needs. The Framework prescribes that IRPAs must be in the best interest of Enbridge Gas and its customers; thus, any alternative must align with the guiding principles of reliability, safety, cost-effectiveness, public policy, optimized scoping, and risk management.

The OEB has since provided approval for the SLH IRP Pilot Project, which Enbridge is implementing to understand and evaluate how IRPAs can potentially avoid, delay, or reduce facility projects.

As outlined in the pilot application to the OEB, the primary objectives of the SLH IRP Pilot project are twofold.

1. Develop an understanding of how Enhanced Targeted Energy Efficiency (ETEE), Demand Response (DR) programs, electrification measures, and advanced technologies impact peak hour flow/demand.
    a. Quantify actual peak hour flow reductions (m3/hr) resulting from ETEE and DR programming by customer type by comparing peak hour flow per customer prior to and after ETEE and DR programming is implemented.
    b. Evaluate DR event parameters on peak hour flow reductions and the adoption and persistence of customer participation in DR programming over time.
2. Evaluate and understand how to design, deploy, and evaluate ETEE and, residential DR programs, as well as other IRPA measures, that are targeted to specific, geographic areas.

The scope of this project is to support the achievement of objective 1. Outputs from this evaluation may serve as the input to future projects or initiatives.

The SLH distribution system supplies natural gas to approximately 30,000 customers located in the City of Sarnia and the Village of Point Edward in the County of Lambton. The market characteristics match well to Ontario as a whole, with a balanced mix of residential, commercial and industrial customers.

[1] IRP Framework for Enbridge Gas, July 22, 2021. pp 4.

Figure 1 - SLH Pilot Area



The SLH IRP Pilot operates within the same planning framework used to determine Enbridge Gas's system capacity requirements. Under the *Design Criteria and Design Demands Process* (EB-2022-0200), Enbridge defines system design criteria using the coldest observed day on record, expressed as Heating Degree Days adjusted for wind speed (HDDw). This "set-temperature" method reflects a no-failure reliability standard - ensuring that all infrastructure and operational plans can meet customer demand during the coldest historical conditions. The associated design-day (maximum daily) and design-hour (maximum hourly) demands form the basis for system sizing, reinforcement decisions, and assessment of Integrated Resource Planning Alternatives (IRPAs).

By evaluating how Enhanced Targeted Energy Efficiency (ETEE) and Demand Response (DR) affect peak-hour load under these design conditions, the pilot provides empirical evidence on whether demand-side resources can offset or defer capital investment while maintaining Enbridge's mandated reliability and safety standards.

The pilot focuses on residential and commercial programs, including[2]:

- enhanced residential whole home and single measure demand-side management (DSM).
- enhanced commercial/industrial custom, direct install (DI), and prescriptive DSM.
- electrification measures (ASHP, GSHP) with limited residential customer participation, including customers who have previously installed these, where known.
- residential demand response (DR) pilot, using a bring your own device (BYOD) strategy to target gas space heating.

Roughly 1600 participants are expected for residential ETEE pilot offers, 700 participants for residential DR, and 60 to 150 participants for Commercial ETEE Pilot Offers.

Enbridge has engaged Dunsky Energy + Climate Advisors (Dunsky) to evaluate its Southern Lake Huron (SLH) Integrated Resource Planning (IRP) pilot project. This evaluation plan document outlines and is intended to guide the evaluation process. It is a crucial first step to understand the SLH IRP pilot and surrounding factors, outline evaluation objectives, identify appropriate data and data sources, and describe the evaluation methods and schedule to

[2] Advanced technology measures have not yet been approved in the OEB Decision and Order, but are at issue in the OEB Motion to Review.

meet Enbridge's evaluation obligations as determined by the OEB. This document includes an overview of the SLH IRP pilot program, supported projects, evaluation objectives, key research questions, methodology, evaluation schedule, and how findings will be communicated.

2. Key Research Objectives

The objective of this work is to support Enbridge's pursuit of the first IRP Pilot Project objective in developing an understanding of how ETEE and DR offerings impact peak hour flow/demand throughout the duration of the IRP Pilot Project term through evaluation activities. The evaluation of this objective will assist Enbridge in the refinement of the approach and assumptions to be applied to the evaluation and implementation of these programs in relation to the IRP process and future IRP Plans.

Specifically, the evaluation aims to:

- Quantify actual peak hour flow reductions (m3/hr) resulting from ETEE and DR programming by customer type by comparing peak hour flow per customer prior to and after ETEE and DR programming is implemented.
- Evaluate DR event parameters on peak hour flow reductions and the adoption and persistence of customer participation in DR programming over time.
- Extrapolate evaluation findings to project design peak impacts using Enbridge's regression analysis approach.

3. Data Sources

3.1 ERT Data

3.1.1 ERT Data Description and Scope

ERT (Encoder Receiver Transmitter) data are hourly gas consumption readings collected from Enbridge's smart gas meters. These meters transmit interval data, providing time-stamped hourly usage records that can be used to assess load shape, seasonal patterns, and customer responses to demand-side measures.

In the SLH IRP Pilot, ERT data are the primary quantitative input for evaluating peak-hour demand impacts of Enhanced Targeted Energy Efficiency (ETEE) and Demand Response (DR) programs. The data allow for direct comparison of pre- and post-program peak usage (m^3/h) by customer type and region. The following table shows ERT customer counts for available hourly data in the SLH pilot region as of early 2025.

Customer Type	Hourly ERT Data	Total	% with Hourly ERT Data
Residential	18,976	26,597	71%
Commercial/ Industrial	1,505	2,170	69%
All Customers	20,481	28,767	71%

3.1.2 ERT Data Quality and Challenges

Review of hourly data has highlighted some gaps and challenges on some routes. ERT data quality is influenced by meter age, route configuration, and data transmission settings.

- **Completeness:** Vintage ERTs (prior to 2009) are not able to provide hourly data (represents approximately 30% of all customers). For the ERTs that are able to provide hourly data, over 70% of meters have been gathering data consistently (50% of total customers). Gaps are being closed through updated meter-reading contractor procedures that ensure hourly data collection is enabled for ERTs. It is expected that additional customers with ERTs will have adequate baseline hourly data prior to customer measures being implemented.
- **Temporal Alignment:** Each route's data are time-stamped and linked to corresponding hourly weather (temperature, wind) data for regression analysis by Enbridge. Multiple weather stations will be considered and analysed.
- **Spatial Coverage:** Routes in both urban Sarnia and Point Edward are read monthly, ensuring regular geographic sampling across mixed customer types. Intermittent route gaps and errors remain a variable that will need to be managed through ongoing data quality processes.
- **Data Validation:** Enbridge performs load-vs-weather regression analysis and is developing automated processes to handle the hundreds of millions of hourly ERT data points. Dunsky will be validating and replicating the processes and analysis in samples of data.

3.2 BrightLync Data

3.2.1 BrightLync Data Description and Scope

BrightLync modules are advanced telemetry devices installed on commercial and industrial (C/I) meters to record and transmit hourly natural gas consumption data. The technology is appropriate for the larger meter sizes these customers sometimes use.

In 2024-Q4, Enbridge reached out to large C/I customers in the SLH pilot area; over 90 customers showed interest in meter station upgrades, and Enbridge proceeded to order BrightLync modules. Meter station upgrades (swap or rebuild) are sometimes challenging, involving product procurement, scheduling, customer availability, and technical needs (e.g. bypass availability for duration of work, location of meter, etc.).

At the end of 2025, approximately 80 BrightLync devices will be installed, as well as hourly ERTs on smaller commercial sites interested in the SLH pilot. Additional devices will be installed on a customer interest basis from the program roll-out. Baseline data gathering begins with installation and proceeds until a customer implements an ETEE measure.

3.2.2 BrightLync Data Quality and Challenges

BrightLync installations deliver high-resolution, equipment-calibrated readings suitable for regression analysis ETEE measure impact verification, but several operational and data-integrity challenges remain.

- **Installation Constraints:** Winter conditions limit work at sites without bypass valves, delaying some installations until warmer weather. Meter swaps and rebuilds depend on customer availability and coordination with internal station crews, introducing variability in data start dates.
- **Baseline Duration:** Because BrightLync module installation began in early 2025, only limited pre-program data (one heating season or less) may be available before ETEE implementation begins.
- **Data Integration:** Enbridge is still integrating BrightLync feeds into its central hourly meter database to enable automated analytics.
- **Data Completeness:** Early datasets cover only a handful of customers; broader rollout through 2025 is ongoing to achieve statistically meaningful samples.
- **Measurement Verification:** Ongoing data-quality and calibration reviews are in place to ensure reliable readings as additional modules come online.

3.3 Weather Data

3.3.1 Weather Data Description and Scope

Weather data are used to assess gas consumption and load sensitivity to outdoor temperature and wind. In the SLH pilot area, Enbridge currently uses hourly temperature and wind data from regional Environment and Climate Change Canada (ECCC) weather stations near Sarnia and the Southern Lake Huron service area (London, Windsor), synchronized to hourly gas meter readings.

This data is used by Enbridge teams as part of their load-vs-weather regression models, which quantify how natural gas demand varies with weather (temperature and wind) and time of day for typical modeling activities.

Regression parameters derived from weather data (e.g., heating degree hours, temperature, wind) allow for comparison of participant and non-participant peak-hour demand, controlling for climatic variability.

For program evaluation purposes, weather data will be used to generate Heating Degree Hour (HDH) and wind-adjusted Heating Degree Day (HDDw) indicators, consistent with Enbridge's *Design Criteria and Design Demands* Process. The HDDw formulation accounts for the combined influence of temperature and wind speed on heating load and provides the linkage between the pilot's regression models and Enbridge's official design-day conditions. This will be applied in both baseline/non-participant normalization and participant impact models. Enbridge will also investigate the modeling accuracy results with different weather station locations (Windsor vs London). Other variables may be considered as described in 4.4.

3.3.2 Weather Data Quality and Challenges

While temperature data from ECCC and other public sources are generally reliable, several factors influence the quality and representativeness of weather inputs in the SLH pilot context.

- **Spatial Resolution:** The SLH region spans both urban and rural microclimates, and a single reference station (e.g., Sarnia Airport) may not perfectly reflect all local conditions, especially for coastal or industrial zones. This effect is likely to be minor or negligible and can be mitigated by using data from multiple nearby ECCC stations.
- **Temporal Alignment:** Precise timestamp synchronization between hourly temperature readings and ERT/BrightLync consumption records is required; even small-time offsets can introduce regression noise during peak-hour periods.
- **Missing or Noisy Data:** Occasional data gaps, rounding errors, or timestamp irregularities from ECCC feeds can reduce continuity in the hourly temperature series. These are typically corrected through interpolation or substitution from nearby stations. Depending on the type and volume of customer data or weather data that may be missing, Enbridge either removes the data for linear regression, or substitutes average customer sizes for day-to-day modeling. Substitution prior to regression is not completed since this is not for customer billing or any other purpose for monthly needs. For the SLH pilot, no substitution should take place on the upfront data gathering.

3.4 Smart Thermostat Data for Demand Response

3.4.1 Smart Thermostat Data Description and Scope

Smart thermostat data is a customer-level data source for evaluating Demand Response (DR) program performance. The data captures both thermostat operation and event participation metrics during scheduled DR events intended to reduce gas demand during system peak hours.

For participating residential customers, smart thermostats record:

- temperature setpoints (before, during, and after DR events).
- HVAC system runtime and cycling behaviour.
- event participation details (including opt-ins, opt-outs, and overrides).
- customer interaction data (such as manual adjustments during events or comfort complaints logged through apps).

This data is transmitted via the thermostat vendor's cloud-based platforms. Thermostat and consumption data must be linked before these records are anonymized and aggregated to provide useful inputs for integration into the DR evaluation dataset. Information will be anonymized between the DR Delivery Agent and Enbridge by using a unique customer identifier code rather than an account number, address, name, etc.

These datasets are used to quantify average hourly load reductions (m^3/h) during event windows relative to baseline hours (non-DR event hours during cold weather). It can also be used to assess event reliability, customer persistence, and rebound effects (post-event load increases). These data are paired with ERT hourly consumption data and weather variables to create complete regression-ready event records for impact analysis. In this analysis, ERT data

may be primary, with the vendor thermostat data providing details on customer opt-outs, quantities, etc.

3.4.2 Smart Thermostat Data Quality and Challenges

While smart thermostat telemetry provides rich, high-frequency behavioural data, several data quality and coverage challenges affect its use for rigorous DR impact evaluation:

- **Data Provision:** As of the date of issue of this EM&V Plan, there is a signed contract with a smart thermostat contractor for data provision, but discussion is ongoing regarding specific data and information to be provided. Exact details on provision and access to smart thermostat data will shape the extent to which DR measures can be evaluated.
- **Data Limitations:** Smart thermostats do not differentiate what equipment they control and only have runtime data. Thus, actual equipment consumption cannot be known from smart thermostat data alone.
- **Data Integration and Timing:** Smart thermostat event data and ERT gas consumption data are logged by separate systems, often at different timestamps or time zones. Aligning thermostat runtime data with hourly gas usage for the same household requires precise temporal synchronization to avoid misattribution of DR effects.
- **Limited Penetration:** Only a subset of ERT-equipped residential customers are expected to have enrolled in the DR program during the initial pilot window. This small sample size may limit statistical significance in aggregate DR savings estimates. This uptake will be determined during the course of the SLH pilot evaluation.
- **Opt-Outs and Overrides:** Customer comfort preferences may alter event outcomes. Opt-outs or manual adjustments during an event reduce measured savings and increase variability in results.
- **Temperature Rebound and Persistence Effects:** Post-event "catch-up" heating can create a new peak if mitigating strategies are not put in place. Detecting this requires multi-hour post-event tracking and accurate weather normalization. Depending on the number of enrolled customers and geographic locations, this post-event peak is likely acceptable if the overall system peak is reduced on the system of need. This may necessitate groupings of DR measures or limits on customer saturation of DR.

3.5 Other Data

3.5.1 Other Data Description and Scope

In addition to metered consumption and weather data, the SLH IRP Pilot draws on a suite of program-level, customer-level, and contextual datasets to support evaluation. These "other" data sources enable evaluators to understand who participated, what ETEE measures were installed, and DR event opt-in rates. Key datasets include the following.

- **Program Tracking Data:** Participation records from Enbridge's internal IRP and DSM systems, documenting customer enrollment dates, measure types (e.g., insulation, heat pumps, etc.), installation timelines, and incentive levels.
- **DSM / ETEE Program Records:** Legacy and pilot-specific DSM datasets identifying equipment characteristics, savings assumptions, and measure costs, used for cross-comparison with historical program performance.
- **Customer Characteristics:** Building type, age, size, heating system type; drawn from Enbridge's customer database and MPAC property records.

3.5.2 Other Data Quality and Challenges

While these datasets provide valuable context, they are administrative rather than instrumented data sources and thus carry their own limitations and consistency risks.

- **Data Completeness:** Program records may omit installation dates, or measure details.
- **Consistency Across Systems:** DSM, IRP, and customer information systems were developed separately; ensuring consistent identifiers (e.g., customer account number, premise ID) across systems is essential for clean joins with metered data.
- **Timeliness:** Updates to participation and installation records can lag behind actual implementation, creating potential misalignment between "program start date" and observed load impacts.
- **Data Accuracy:** Building and demographic data (e.g., MPAC) can contain outdated information on building size or system type, requiring validation against billing or field data.
- **Administrative Limitations:** MPAC data carries contractual limitations on storage, adding complications to data handling practices; accessibility of this data to be explored during evaluation activities.

4. Customer Load Extrapolation Methodology

4.1 Overview

The customer demand extrapolation will be led by Enbridge with collaboration from and methodology evaluation by Dunsky. This will allow the pilot results to draw on the expertise of Enbridge in system design, demand profiling, and historic design practice in Ontario, while allowing for Dunsky's experience in demand response, regression-based load modeling, and large dataset evaluation to be incorporated. In addition to validating the methodology and general evaluation approach, Dunsky will run analyses on data samples to verify the peak impact estimates.

This section contains an overview of Enbridge's proposed load extrapolation methodology and approach, which is under review by Dunsky as described in Section 5 of this EM&V Plan document. It is intended to contextualise the peak design methodology used by Enbridge and the pilot project, but does not constitute an evaluation methodology for the pilot project (the evaluation methodology for the pilot project is described in Section 5 and subsequent sections). This pilot project focuses on using actual consumption data to understand customer consumption patterns for the purposes of gas delivery network design. However, since these networks are designed to meet demand under extreme weather conditions it is important to estimate consumption at these conditions. The extreme weather condition is termed the Design Degree Day. Extrapolations must be used since these extreme weather conditions are infrequent, and have a low probability of occurrence during the 2-year pilot timeframe.

Several models will be developed to extrapolate the actual data to design conditions. Models will focus on isolating demand data for a specific time period (ex. demand on Wednesday at 7 AM during the winter) and assessing the sensitivity of demand against hourly weather data. This allows for linear regressions to be performed for each time period separately.

Statistical analysis will be performed to understand the strengths and weaknesses of the different models for different groups of customers. The Root Mean Square Error (RMSE) will be calculated to evaluate the strength of the various models. When comparing models a higher weight is given to model performance during the highest consumption hours, cold months, and extreme cold temperatures to bias the results towards accuracy under these conditions. The best performing model for the majority of customer demand will be selected by Enbridge to estimate design customer demand.

Coincident peak of all customers is considered to ensure results are appropriate for system design. The customer models will be combined into a system profile to determine when the coincident peak occurs at a Design Degree Day. Once the time of the coincident peak is determined the demand from each customer at this time will be considered their peak demand for system design. Once developed these models can be used on consumption history for different time periods to understand how ETEE and DR impact customer peak demand.

4.2 Data Validation and Filtering

Prior to regression modeling, all input datasets undergo systematic data validation and cleaning to ensure reliability and comparability. Where either consumption or weather data is missing the data is removed. Missing weather data is an infrequent occurrence, so estimating gaps is unnecessary. While in some cases there are substantial gaps in consumption data, the gaps are very long so filling them in would pose a large challenge. Additionally, since the model is meant to predict consumption (not estimate billing), this would create a feedback loop where estimates are used to model more estimates which would undermine the validity of the results.

Holidays and days where local time shifts due to DST adjustments will also be filtered out since habits during these days may be affected. The period from Christmas to New Years is also removed since many businesses shut down during this time frame, which could affect not only their demand, but residential demand since the workers schedules will also be affected.

Only winter data will be used for creating models to bias the results to cold temperatures during the heating season. Winter is defined as December through March inclusive. While shoulder seasons (spring and fall) could be utilized in regression, it can be difficult to predict if a customer's heating system is active, which can lead to difficulties in predicting consumption. Removing the shoulder seasons from the analysis eliminates this variable.

Interquartile analysis is performed on each customer's demand to detect outliers. The analysis must incorporate temperature since its exclusion can make it seem like customer demand at extreme temperatures are outliers, which would remove some of the most critical data.

4.3 Linear Regression by Hour

Data will be separated by hour such that 24 individual linear regressions can be performed. Customer consumption is regressed against heating degree hours. This allows for the heat sensitivity of customers to be understood while isolating for differing habits across the day. The constant variable from the regression represents the base demand present under all weather conditions for uses like water heating, cooking and process loads. The slope represents the temperature sensitivity of the customer per degree hour representing building heating.

Inputting a degree hour into 24 equations will yield a customer demand profile for the day. Demand surfaces can also be created by combining the profiles for all possible degree hours into a 3D graph.

4.4 Model Variations

Different versions of the model will be developed to ensure that system demand can be estimated as accurately as possible. Permutations of variations will be evaluated against each other to assess which is the most appropriate. Below is a preliminary list of variations that are expected to be tested.

Base Temperature

Enbridge uses a constant base temperature of 15°C when calculating degree days. While this is a standard average base temperature, it may not be appropriate for all customers. Additionally, due to variables such as building occupancy and thermostat setbacks, this value

may not be appropriate for a single customer under different time periods. Models will be developed allowing variation of base temperature between customers and times.

Recent Weather History

Buildings have thermal mass that may not react instantly to changes in outdoor temperatures. Models will be developed to determine whether averaging temperatures in recent hours reduces model error. Degree days will be compared with degree hours with and without wind speed adjustments. Alternate models with lagged variables will be explored.

Weekday Effects

Different days of the week will have different customer habits affecting consumption. Ideally models would seek to look at these effects independently, but this will limit the amount of data available for each regression. It will be investigated if there are significant differences between different days of the week, and if sufficient data is available to improve model performance.

4.5 Demand Response Analysis

Analyzing demand response (DR) events will be challenging since there will be fewer days of data that can be evaluated than for ETEE. This will be mitigated by intentionally selecting event days with a range of outdoor temperatures at which to observe trends.

DR analysis will use the same regression methodology as outlined in herein for ETEE but will only have event days included in the analysis to understand customer demand during events. Non-DR event days will be used to estimate what the demand likely would have been to measure against (expanded upon in Section 8).

4.6 Model Validation Approach

Since multiple analysis models will be developed, it is important to have a repeatable method of validating modeled results. The following methods will be used to ensure modeled results are appropriate for system design.

Segmenting Model Training and Test Data

Since multiple models will be developed there is a risk of overfitting models. This could occur if the selected model performs well on the historical meter reads collected, but when new meter reads are gathered the model performance drops. This could be due to some coincidental factor in the historical data that might not be present in future data.

To mitigate the chance of overfitting, data will be split into training data and test data. Training data will be used as an input to models linking external weather data with consumption patterns. Once the models are developed for all customers, the test data will be used to calculate composite RMSE values for evaluating model performance.

Composite RMSE

The primary statistic used for this evaluation will be the Root Mean Squared Error (RMSE). A composite value of RMSE for all customers evaluated will be created to generate a single number for comparison. RMSE was selected for evaluation over R-squared because it describes fit and overall error in a single number. By including overall error in the composite value, we ensure that the impact of larger customers is not lost. For example, if a composite R-

squared value was selected, all values would max out at 1, which would give the same weight to error in a small residential customer as a large industrial customer. For system design it is important that total load is calculated accurately, not that most customers have the least error.

First, a customer composite RMSE will be calculated. This will be a weighted average of the RMSE for all separate time periods regression was performed on focusing on time periods where system peaks are likely to occur. Since system peaks are the focus, only data from January and February will be included in test data. Holidays and days where local time shifts due to DST adjustments will be removed from training and test data. The outline below is a draft and may be updated if results show that peak time periods aren't as expected.

For hourly separations weights are as follows:

- 70% of weight will be given to peak hours (7-9 am)
- 20% of weight will be given to afternoon peak (5-7 pm)
- 10% of weight will be given to all other hours

For daily separations weights are as follows:

- 60% of weight will be given to midweek days (Tuesday to Thursday)
- 30% of weight will be given to weekend adjacent days (Monday and Friday)
- 10% of weight will be given to weekends (Saturday and Sunday)

Once the customer weighted RMSE is calculated, a system RMSE will be calculated. The system RMSE is an average of the customer RMSEs.

Visual Inspection of Results

Model performance may be very close between variations, so visualising results will assist in understanding performance across a range of conditions or customer groups. Graphics will be created to compare actual and modeled values for the following scenarios.

- System profile on selection of coldest / highest demand days.
- Estimated profile under design degree day conditions.
- Temperature/DD vs consumption graphs for selected customer groups.
- Additional graphics as required.

Enbridge Collaboration with Dunsky

Enbridge has over 100 years of experience in gas delivery system design. This makes Enbridge ideally suited to understand the historic practices around demand profiling to ensure that the pilot results can be implemented within the business. The demand extrapolation methodology will build on the company's experience with using historic gate station demand to estimate customer demand across their systems.

Dunsky will be involved in the final selection of the model so that their experience in demand response, regression-based load modeling, and large dataset evaluation can be applied as a 3rd party review.

5. Regression Analysis Model Evaluation

The first step in the analysis will focus on assessing Enbridge's peak load vs hourly weather regression analysis. This assessment will confirm that the methodology appropriately captures customer load sensitivity to weather factors, accurately extrapolates results to design-hour conditions, and provides a sound foundation for subsequent ETEE and DR impact analyses.

The general process to perform this assessment is outlined below. The approach is designed to remain flexible and may be refined as additional data or analytical insights become available over the course of the project.

Stage 1 – Technical Working Meetings

Participate in technical working meetings hosted by Enbridge to review the regression methodology and associated data workflows. These sessions will cover the following topics.

- Background on the hydraulic modeling methodology for design conditions
- Pilot data collection methods
- Visualization of individual, averaged, and grouped customer data
- Hourly estimation model development and validation
- Modeling objectives, data sources, and preparation
- Data analysis processes including a summary of raw data, missing data, and outlier detection processes
- Correlation analysis between gas consumption and weather variables
- Regression modeling approach for baseload and heat load
- Planned model enhancements
- Demonstration to Dunsky of Enbridge's internal Hourly Dashboard for visualizing data

These discussions will provide the technical foundation for understanding the analytical framework and identifying potential enhancements. They will also serve as a forum to ask questions on the current analysis methodologies.

Stage 2 – Sample Data Review

Dunsky will review representative treated data files for each primary data type (ERT, BrightLync, and smart thermostat) to gain familiarity with the datasets used in regression analysis. This review will include verification of: data completeness and timestamp consistency; alignment between consumption and weather variables; route-level and customer-level aggregation methods; and data cleaning and filtering processes.

The goal of this stage is to ensure that the regression inputs are properly structured, validated, and suitable for model estimation.

Stage 3 – Regression Algorithm Review

Review Enbridge's regression algorithm and compare it qualitatively to alternative methods and best practices. Dunsky will apply its expertise in demand response, regression-based load modeling, and large dataset evaluation to assess three key factors.

1. **Extrapolation Approach:** the method used to extend historic load and temperature data to the extreme conditions that define Enbridge's system design criteria (e.g., coldest observed HDH, HDDw).
2. **Customer Segmentation:** the approach used to capture differences among customer types, end uses, and other known drivers of peak demand.
3. **Hourly Dynamics:** the model's ability to represent intra-day load changes (particularly during peak periods) to support analysis of preheating, rebound, and heat pump control behaviour observed in the SLH IRP Pilot.

This review will identify potential enhancements that could improve model robustness and interpretability across customer classes.

To validate reproducibility and model sensitivity, Dunsky will request a **representative random customer sample** (residential and commercial/institutional customers, with stratified sampling to ensure good representation of larger customers) to independently re-run the regression model. This verification exercise will:

- validate model reproducibility and sensitivity;
- identify potential data or coding gaps; and
- support transparent benchmarking of Enbridge's regression process.

The results of the sample data set re-run will be summarized in a supporting workbook, including commentary on data quality and observed variance (if any) between Enbridge's and Dunsky's results.

Stage 4 – Error Evaluation

Identify and, where feasible, quantify individual and cumulative sources of variance inherent in the regression analysis. This assessment will help prioritize areas for methodological or data improvement and support understanding of the uncertainty introduced into subsequent pilot impact evaluations. Examples of potential error sources include:

- model specification bias;
- dependence of regression residuals; and
- regression extrapolation uncertainty under extreme temperature conditions.

Stage 5 – Data Enhancement Opportunities

Identify additional data sources that could strengthen regression accuracy and statistical power. These might include better hourly or other time-differentiated load data, both from a top-down system level (e.g., from Enbridge's operations meters) as well as from bottom-up customer and end-use levels, including real-time measured data (e.g. from hourly ERTs and smart thermostats within SLH) or from more generalized data (e.g. from hourly meter/thermostat data throughout Ontario or from load shapes borrowed from other applications and utilities).

Stage 6 – Summary and Reporting

Prepare a memo outlining our assessment of the regression analysis, the standard error that it may introduce into the forthcoming ETEE/DR Pilot impact evaluation, and its application to future evaluations. The memo will outline any data quality issues and propose potential remedies and include an accompanying workbook with sample data set re-run results.

6. Evaluation Statistical Methods

Section 6 presents an overview the evaluation approach for assessing the impacts of the SLH IRP pilot. Sections 7 and 8 then present detailed evaluation methods, with Section 7 focusing on the assessment of enhanced targeted energy efficiency (ETEE) impacts and Section 8 focusing on the assessment of demand response (DR) impacts. Together, these sections explain how pilot impacts will be calculated and interpreted.

6.1 Control Group Selection

Enhanced Targeted Energy Efficiency

For the ETEE offerings and electrification measures, we will use a combination of pre- and post-treatment data with control groups. Control Group 1 will be selected to include non-participants to DSM offerings inside of SLH region, matched to ETEE participants using known characteristics.

To limit self-selection bias, we will attempt to select a control group outside of the SLH treatment region (Group 2), which will be matched to participants based on known (observable) characteristics. Control Group 2 will apply for residential customers only, as hourly interval meter data is unavailable for commercial customers outside of the SLH pilot region.

For electrification measures, customers may or may not participate in other programs, including ETEE offerings. The appropriate control group is thus a mix of non-participants and participants to regular DSM programs, inside and outside of the SLH region (Control Group 1b and Control Group 2b, respectively).

Demand Response

For demand response (DR), control groups are not required, as each participant's baseline load curves will be used to establish the baseline for DR events. This assumes that a few time periods that would normally constitute an event are observed before the program deployment of DR events to create those baseline load curves under extreme weather conditions.

6.2 Control Group Summary

Table 1: Control Group Summary

Pilot Group	Control Group
Enhanced residential whole home DSM offering (1600 expected participants)	Non-participants to DSM offerings inside of SLH region (group 1). Participants to whole home DSM offering outside of SLH region with ERT (group 2).
Enhanced commercial/industrial custom, direct install (DI), and prescriptive DSM (60-150 expected participants)	Non-participants to DSM offerings inside of SLH region, matched to ETEE participants using known characteristics.
Electrification measures (ASHPs, GSHPs)	Gas customers (mix of non-participants and participants), inside and outside of SLH region (respectively group 1b and group 2b), matched to electrification participants using known characteristics.
Residential DR pilot (700 expected participants)	No control group needed.

6.3 Statistical Methods

Table 2: Evaluation Methods Summary

Pilot Group	Evaluation Method
Enhanced residential whole home DSM offering (1600 expected participants)	**Peak savings:** regression analysis of control groups vs treatment group hourly usage against weather conditions (outside temperature, wind) for participants with ERTs.
Enhanced commercial/industrial custom, direct install (DI), and prescriptive DSM (60-150 expected participants)	**Peak savings:** regression analysis of control groups vs treatment group hourly usage against weather data (outside temperature, wind) for participants with ERTs.
Electrification measures (ASHPs, GSHPs)	Identify control and treatment group from among participants and non-participants. Apply pre- and post-hourly load analysis to determine peak hour savings. **Peak savings:** regression analysis of pre-post hourly usage against weather data (outside temperature, wind) for participants with ERTs.
Residential DR pilot (700 expected participants)	Establish baseline peak curve and compare to DR response events.

* If any proposed evaluation method results are inconclusive, we will consider supplementing the analysis with engineering algorithms and modeling approaches where they may increase the robustness of the results. Alternate methods for evaluating peak savings involve applying algorithms to calculate peak savings from energy savings using load shapes developed from available meter data, smart thermostat data, available generic end use load curves, past evaluations, etc.

7. Enhanced Targeted Energy Efficiency (ETEE) Evaluation

7.1 Overview and Methodology

The Enhanced Targeted Energy Efficiency (ETEE) evaluation assesses how energy efficiency measures influence peak-hour and design temperature gas demand. The objective is, for the purposes of gas delivery system design, to quantify measurable load reductions (m^3/h) attributable to ETEE interventions while controlling for temperature, customer type, and market trends.

The regression analysis will include the following tasks.

- Clean and assemble billing data, metering data, and program tracking data for all ETEE participants.
- Estimate site-level peak demands for pre- and post-installation periods for participants.
- Identify and remove outliers and other ETEE participants with issues (missing data, inconsistent regression coefficient, etc.).
- Construct a comparison group (group 1 – DSM non-participants) to address non-DSM exogenous change, and a similar comparison group (group 2 – DSM participants) to address non-ETEE exogenous change.
- Determine the average peak savings and savings at design temperature per participant resulting from ETEE participation.

7.2 Statistical Methods

Table 3: ETEE Evaluation Methods

Pilot Group	Evaluation Method
Enhanced residential whole home DSM offering (1600 expected participants)	**Peak savings:** regression analysis of control groups vs treatment group hourly usage against weather conditions (outside temperature, wind) for participants with ERTs, incorporating additional key program data; incorporating smart thermostat data, if available; extrapolated to non-ERT customers based on known usage/building/customer characteristics. Peak hour gas use prior to and after implementation of ETEE measures will be compared to verify that they are statistically different, and the difference between the two curves will be extrapolated to design temperature.
Enhanced commercial/industrial custom, direct install (DI), and prescriptive DSM (60-150 expected participants)	**Peak savings:** regression analysis of control groups vs treatment group hourly usage against weather data (outside temperature, wind) for participants with ERTs, incorporating additional key program data; extrapolated to non-ERT customers based on known usage/building/customer characteristics. Peak hour impacts to be extrapolated to design temperature. • Homogenous group(s), 40-50 or more, identify best targets (segment, annual consumption, etc.). • Potentially collect additional hourly building and/or end use metering data for larger/custom projects. • Apply engineering algorithms to estimate net savings at peak for other customers/measures. • Total savings adjusted using pre/post impacts of control groups.
Electrification measures (ASHPs, GSHPs)	Identify control and treatment group from among participants and non-participants. Apply pre- and post-hourly load analysis to determine peak hour savings. **Peak savings:** regression analysis of pre-post hourly usage against weather data (outside temperature, wind) for participants with ERTs, incorporating additional key program data; extrapolated to design temperatures for peak day/hours; extrapolated to non-ERT customers based on known usage/building/customer characteristics.

7.3 Control Group Selection

For the ETEE offerings and electrification measures, we will use a combination of pre- and post-treatment data with control groups. The pre- and post-treatment data will estimate the impact of energy efficiency and electrification measures, while the control groups will factor in external effects such as energy prices and social trends on naturally occurring energy efficiency and electrification.

Control Group 1 will be selected to include non-participants to DSM offerings inside of SLH region, matched to ETEE participants using known characteristics such as size, vintage, etc.

One key consideration when designing the evaluation approach is the possibility of having a self-selection bias in the results. Program participants are self-selected (they choose to participate or not), and this choice may be correlated to building characteristics, consumption profiles, etc. In other words, the program participants may have different characteristics than those of the general population just because they chose to participate in the program.

To limit self-selection bias, we will attempt to select a control group outside of the SLH treatment region (Group 2), which will be matched to participants based on known (observable) characteristics and time of participation in DSM programs. The possibility of creating such a control group will be explored and the outcome may be determined by data availability and data quality. Control Group 2 will apply for residential customers only, as hourly interval meter data is unavailable for commercial customers outside of the SLH pilot region.

Both groups will be matched to pilot participants based on observable characteristics such as annual consumption, building type/segment, etc. This will help alleviate the self-selection bias, although unobservable characteristics may still differ between the control group and program participants.

For the ETEE portion, we will assess the peak hour impacts against two baselines: DSM participants, and non-participants. This will enable us to determine the absolute peak hour impact, as well as any incremental peak hour impact of ETEE when compared to standard DSM offerings. Control Group 1 will be selected among non-participants to assess the overall impact of DSM including the ETEE offering. An analysis of program uptake will complement the evaluation of savings per participant as ETEE can also have the effect of increasing the uptake. Control Group 2 (contingent on data availability) will thus be selected among participants to regular DSM programs to evaluate increased savings (deeper savings) from ETEE.

For electrification measures, customers may or may not participate in other programs, including ETEE offerings. The appropriate control group is thus a mix of non-participants and participants to regular DSM programs, inside and outside of the SLH region (Control Group 1b and Control Group 2b, respectively).

Table 4: ETEE Control Group Descriptions

Pilot Group	Control Group
Enhanced residential whole home DSM offering (1600 expected participants)	Non-participants to DSM offerings inside of SLH region, matched to ETEE participants using known characteristics (group 1). Participants to whole home DSM offering outside of SLH region with ERT, matched to ETEE participants using known characteristics (group 2). If possible, control group 2 will be selected in regions that have a similar climate to the pilot's territory.
Enhanced commercial/industrial custom, direct install (DI), and prescriptive DSM (60-150 expected participants)	Non-participants to DSM offerings inside of SLH region, matched to ETEE participants using known characteristics.
Electrification measures (ASHPs, GSHPs)	Gas customers (mix of non-participants and participants), inside and outside of SLH region (respectively group 1b and group 2b), matched to electrification participants using known characteristics. If possible, control group 2b will be selected in regions that have a similar climate to the pilot's territory.

7.4 Limitations and Intended Uses of Results

The evaluation produces empirical results based on observed pilot data; however, the scope, sample size, and data quality constraints inherent to a pilot setting introduce limitations. Thus, the results should be viewed as directional rather than definitive. This section identifies key limitations and clarifies how the results should be applied in future IRP planning.

Limitations

- **Pilot Scale and Duration:** The SLH IRP pilot covers a limited number of participants and a two-year evaluation window. This short timeframe restricts the ability to observe long-term persistence of energy savings or customer behavioural changes. In addition, seasonal variations (e.g., only one or two heating seasons per site) may introduce volatility in estimated savings. Small sample sizes for some customer segments or measures may limit statistical significance and ability to subsegment data.
- **Participant Self-Selection:** Program participants self-select into ETEE offerings, and while matching with control group customers based on known characteristics attempts to correct for this bias, participants may differ from the broader customer population on unobservable characteristics (e.g., building efficiency, equipment vintage, or energy-use behaviour).

- **Statistical Uncertainty:** Regression-based estimates include standard errors and confidence intervals that reflect data variability and model fit. These uncertainties will be reported and should be considered when interpreting numerical savings estimates.
- **Model extrapolation:** The model must be extrapolated outside of the range of observed outside temperatures to evaluate impacts at the system design temperature. Steps will be taken to control for possible bias (e.g. analysing residual errors with outside temperature, testing alternate non-linear models).

Intended Uses

The ETEE pilot evaluation is designed to inform planning. Its findings will guide how IRP Alternatives are valued and assessed with a better estimate of customer uptake, program costs, and peak hour effects. Appropriate uses include the following.

- **Gas Delivery System Design:** With a focus on extreme cold conditions.
- **IRP Assessment Process Learnings:** Providing empirical evidence on the feasibility and magnitude of efficiency-driven demand reduction for system-planning purposes.
- **Program Design Improvement:** Identifying effective measure types, participation drivers, and data-collection practices for future pilots or full-scale programs.
- **Methodological Learning:** Testing regression models, control-group selection methods, and data-integration processes for use in broader IRP applications.

7.5 ETEE Measures Available by Customer Type

Customer Type	Meter Type	ETEE Measures	Notes
Residential	ERT	Insulation (attic, basement, walls); draft-proofing (air sealing); windows, doors, skylights, sliding doors; heat pump water heaters; electric cold climate ASHPs (maximum 20); electric GSHPs (maximum 20); smart thermostats.	Up to $15,000 in upfront full cost coverage. Participants cannot receive an incentive for both a heat pump and home upgrades. It's one or the other.
Small Commercial	ERT	Direct install and prescriptive measures: air curtains; dock door seals; condensing make-up air units; ozone laundry; ventilation; destratification fans; demand-controlled kitchen ventilation; demand controlled (other) ventilation; heat recovery and energy recovery ventilators). Custom options: including but not limited to building automation systems; control upgrades; ventilation equipment; heat recovery.	Direct-install and prescriptive measures: up to $100,000 in full cost coverage. Custom incentive (less uptake for small commercial): $2/$m^3$ up to $250,000 for general commercial and up to $500,000 for industrial, agricultural, and institutional customers.
Large C/I	BrightLync	Same measures as for Small Commercial customers.	Same direct-install, prescriptive, and custom pathways as for Small Commercial Customers.

7.6 Measurables and Data Evaluation

7.6.1 Residential (ERT)

Control Groups (Non-Participants): Customers outside or inside of the SLH region, matched to pilot participants on consumption and building characteristics. Two control groups will be selected amongst the following customers.

- Non-participants to whole home DSM of ETEE offering inside of SLH region, matched to ETEE participants using known characteristics (group 1).
- Participants to whole home DSM offering outside of SLH region, matched to ETEE participants using known characteristics (group 2).

Sample Group (Participants): Approximately 1600 participating homes are expected in the SLH region.

Measure Breakdowns: Where sufficient participation data exist, results will be disaggregated by measure type to highlight the relative contribution of key residential upgrades. If sample sizes are too small for measure-level analysis, results will be aggregated at the whole-home level with supporting qualitative insights from program tracking data.

The regression results and load-curve analysis will quantify the effects of ETEE in absolute terms (m^3/h) per customer and groupings of customers, forming the basis for system-level extrapolation of residential ETEE impacts.

7.6.2 Commercial (ERT & BrightLync)

Control Groups (Non-Participants): Customers inside of the SLH region, matched to pilot participants on consumption and building characteristics. The control group will be selected amongst the following customers, subject to data availability.

- Non-participants to custom, DI, and prescriptive DSM or ETEE inside of SLH region, matched to ETEE participants using known characteristics.

Sample Group (Participants): The C/I participant group is expected to include approximately 150 facilities located within the SLH region. These sites are enrolled in ETEE programs tailored to their sector and building type. Facilities are equipped with either ERT (for smaller commercial customers) or BrightLync (for larger commercial sites) hourly gas metering. Hourly data from these meters, as available, will be used to perform pre- and post-ETEE regression analyses that relate load to weather and operating conditions, allowing estimation of changes in peak-hour demand and overall energy use. These participant-level results will then be compared with matched control-group customers inside of the SLH region.

Measure Breakdowns

Where sufficient participation data are available, results will be analyzed by major measure type to identify which interventions yield the largest impact. Representative measure categories. If sample sizes for certain measure types are limited, measures may be aggregated by sector (e.g. office, retail, light manufacturing) for statistical reliability.

The regression results and load-curve analysis will quantify the effects of ETEE in absolute (m^3/h) terms per customer and groupings of customers, forming the basis for system-level extrapolation of commercial ETEE impacts.

7.6.3 System Level Impacts of ETEE

The system-level analysis translates customer-level savings into measurable impacts on the SLH regional gas distribution system. Results from the customer-level residential, small-commercial, and industrial regression models will be aggregated to estimate how ETEE participation affects overall system load during critical peak periods.

This aggregation combines:

- the number of participating customers by category;
- average per-customer reductions in peak-hour flow (m^3/h) by category.

Savings from ERT customers will be scaled up to include non-ERT customers. If ERT and non-ERT customers in any given segment differ materially on any observable characteristics (e.g. annual gas consumption, past participation level to DSM programs), then and adjustment factor may be applied to correct for these characteristics, where relevant.

From these data, Enbridge is poised to estimate total peak-hour demand reduction (m^3/h and percent of total load at peak conditions). These values can be compared with modeled system constraints in Enbridge distribution systems to assess whether ETEE measures could meaningfully defer or reduce future infrastructure investments.

7.6.4 Sources of Error

Several potential sources of error may influence the accuracy of ETEE impacts – outlined below.

- Metering gaps or communication losses for customers enabled for hourly interval metering data (ERT/BrightLync).
- Metering gaps for subset of customers within the SLH pilot region that are not enabled for hourly interval metering data.
- Inaccurate installation or participation records.
- Weather station representativeness.
- Regression-model specification errors (to be assessed under load regression evaluation).
- Self-selection bias and other biases.
- Others as determined as the evaluation process progresses.

7.7 ETEE Evaluation Conclusions

The ETEE evaluation will quantify incremental peak-hour reductions achieved through ETEE measures delivery in the SLH pilot region. Expected outcomes:

- quantified peak-hour gas reductions under extreme cold-weather conditions and extrapolated design temperature demand reductions.
- validation of ETEE targeting as a technically viable IRP Alternative by customer segment, measure, approach, or other characteristic.
- actionable insights for improving data collection, program design, and modeling approaches in future IRP assessment processes.

8. Demand Response (DR) Evaluation

8.1 Overview and Methodology

The Demand Response (DR) evaluation assesses how event-based programs influence hourly gas demand within the SLH pilot region. The objective is, for the purposes of gas delivery system design, to quantify measurable load reductions (m^3/h) achieved by participating customers during DR events, and load impacts right before and after events, to determine the reliability, magnitude, and persistence of these reductions under extreme weather conditions.

The DR contractor has agreement with thermostat providers, and event notification varies between providers through in-app notifications and/or emails. DR strategies are still being defined, and evaluation methodology will evolve as the pilot design is finalized.

Unlike ETEE, which compares participants to external control groups, the DR evaluation uses each participant's own pre-event (or non-event) load curve as the baseline (as described in Sections 4 and 6). Hourly ERT data and smart thermostat event data will be used to:

- establish baseline temperature–load relationships under system peak conditions;
- measure changes in gas demand during DR events; and
- assess rebound, persistence, and customer response patterns before and after events.

Regression and event-analysis techniques will be applied to estimate peak load reductions.

8.2 Statistical Methods

Table 5: DR Evaluation Method

Pilot Group	Evaluation Method
Residential DR pilot (700 expected participants)	Establish baseline peak curve and compare to DR response events (including before and after the event horizon to capture pre-heating, rebound and other effects). Design conditions to be extrapolated to understand the impact on system design.

8.3 Control Group Selection

For demand response (DR), control groups are not required, as each participant's baseline load curves will be used to establish the baseline for DR events. This assumes that a few time periods that would normally constitute an event are observed before the program deployment of DR events to create those baseline load curves under extreme weather conditions. We will use hourly data and building-level regression to calculate expected energy use during what would constitute peak events under the program's definition, compare that curve of expected energy use to real energy use for validation, and then use these results to calculate the baseline energy use during events. Modeled energy use (baseline) and real metered energy use (incorporating program impacts) will be compared at the aggregate level (all DR participants) on an hourly and event basis to evaluate peak savings and other program effects (e.g., pre-heating, rebound, etc.).

8.4 Limitations and Intended Uses of Results

The DR evaluation generates high-resolution insights into short-term load flexibility, but results should be interpreted within the constraints of a small pilot-scale program.

Limitations

- **Participant Self-Selection:** Customers opting into the DR pilot may differ from the broader population in thermostat usage, comfort tolerance and responsiveness to DR events. Results of a small pilot project may not be extrapolated to estimate the impacts of a larger program without some adjustments.
- **Baseline Accuracy:** Baselines derived from pre-event periods may not perfectly represent conditions during actual events, for example when occupancy differs.
- **Data Integration:** Synchronizing thermostat and ERT hourly data requires precise time alignment to avoid underestimating or overestimating savings.
- **Limited Persistence Data:** With only one to two DR seasons (dependent on smart thermostat data availability and timeliness), persistence and fatigue effects may not be quantifiable within the evaluation timeframe.

Intended Uses

The DR results will provide directional evidence of the peak-hour load relief achievable through short-duration thermostat control events. Appropriate uses include the following.

- **IRP Assessment Process Learnings:** Estimating the potential of DR to contribute to localized capacity increase deferral as an IRPA.
- **Program Design Improvement:** Identifying optimal event timing, duration, and control strategies for future DR expansions.
- **Behavioural Insights:** Understanding customer participation, comfort preferences, and rebound behaviour for demand-side planning.

8.5 DR Participation and Data Sources

Customer Type	Meter Type	DR Measures	Data Source(s)
Residential	ERT + Smart Thermostat	Event-based heating setback during peak hours via smart thermostats; baseline and event data used to measure load reductions.	ERT hourly consumption, thermostat cloud data.

8.6 Smart Thermostat Data

Smart thermostat data form the foundation of the DR evaluation. These data provide hourly (or sub-hourly, in some cases) data on temperature setpoints and system runtime. These data can be used to quantify DR event participation and customer response/setbacks during peak-hour. Smart thermostat data will be provided with all personally identifiable information (PII) removed.

Temperature Setpoint Data: Capture thermostat's target indoor temperature. Comparing event-hour setpoints to baseline conditions indicates temperature setback magnitude during a DR event. Setpoint recovery profiles following the event can be analyzed to assess customer comfort preferences and post-event rebound.

Integration with ERT Data: Smart thermostat data alignment with ERT hourly gas consumption data enables regression models to link thermostat behaviour directly to measured load changes. This provides supplemental contextual data to correspond smart thermostat setpoint reductions to metered consumption impacts.

DR Event Call Details: Alignment with event call details enables linking between DR event characteristics, customer/thermostat behaviour, and measured load changes. These details include: event hours and duration, event call execution method (i.e. automated, other methods), data capturing manual overrides.

8.7 Measurables and Data Evaluation

8.7.1 Residential (ERT & Smart Thermostats)

Baseline Group (Non-Event): Because the DR analysis relies on event-based comparisons, there is no external control group. Instead, participant baseline load curves will be developed from similar, non-event days with comparable temperature and occupancy conditions. These non-event days may consist of comparable days pre-DR participation and comparable days post-DR participation when a DR event is not called. This baseline represents the customer's expected heating load in the absence of a DR event. Baselines will be built using non-event regression models that relate hourly gas consumption to weather conditions (temperature, wind).

Sample Group (Participants): The participant group will include approximately 700 residential customers that are expected to enrol in the smart thermostat DR pilot. These customers are equipped with ERT hourly meters and internet-connected smart thermostats

capable of automated temperature setbacks during event hours. Hourly gas consumption data will be analyzed to determine weather-normalized changes in gas demand during DR events.

Event Breakdowns: Where sufficient data are available, results will be grouped by event characteristics to highlight factors that most influence consumption (e.g. event duration, event start time, setback magnitude, ambient temperature band, customer participation/opt-in/out/default enrolment). If sample sizes for some segments are limited, events may be grouped by characteristic groups where analytically appropriate.

Effects of DR: The expected effects of DR for the residential sector include the following.

- **Improved load flexibility:** demonstration of customers' ability to reduce or shift gas demand during system peaks.
- **Limited rebound load:** limited post-event heating load increases as thermostats return to normal setpoints or increase to restore space temperature; rebound magnitude and timing to be quantified.

Regression and event-impact analyses will express these effects in both absolute m^3/h per customer.

8.7.2 System Level Impacts of DR

Event-level savings from residential DR program participants will be aggregated to estimate total system-level impacts. This aggregation combines:

- the number of active DR participants;
- average per-customer reductions in peak-hour flow (m^3/h) by category.

From these data, Enbridge can estimate total peak-hour demand reduction (m^3/h) and equivalent capacity relief (m^3/h) for the SLH pilot region. Savings from ERT customers will be scaled up to include non-ERT customers. If ERT and non-ERT customers in any given segment differ materially on any observable characteristics (e.g. annual gas consumption, past participation level to DSM programs), then an adjustment factor may be applied to correct for these characteristics, where relevant.

Observed participation variability, including opt-outs, inactive participants, or partial response, will be incorporated into the system-level calculations to ensure that estimated aggregate impacts represent actual, realized performance rather than theoretical maximum participation. Participation trends will also be tracked over multiple events and up to two heating seasons (2026 and 2027) to assess persistence and program fatigue, subject to smart thermostat data availability and timeliness.

Where DR events do not coincide with design-day temperatures, results can be scaled to design-hour conditions using regression-based temperature sensitivity factors, estimated baseline heat-sensible gas load at design temperature and average gas use reduction. The evaluation will document assumptions and uncertainty associated with this extrapolation, and will also run a regression analysis on the drop of gas use compared to outside temperature using each hour of the DR events as data points to validate or refine this assumption.

8.7.3 Sources of Error

Several potential sources of error may influence the accuracy of DR impact estimates – outlined below.

- Limited number of participants and DR events (smaller data set).
- Missing or incomplete ERT or thermostat data (gaps, communication losses).
- Time misalignment between thermostat and meter readings.
- Weather station representativeness.
- Uncertainty from extrapolating observed impacts to design-hour conditions.
- Changes in hours of operation or process schedules during events that can mask or mimic DR effects.
- Overlap/program interactions of ETEE measures or other DSM activities with DR events.
- Regression model specification errors (to be assessed under load regression methodology evaluation).

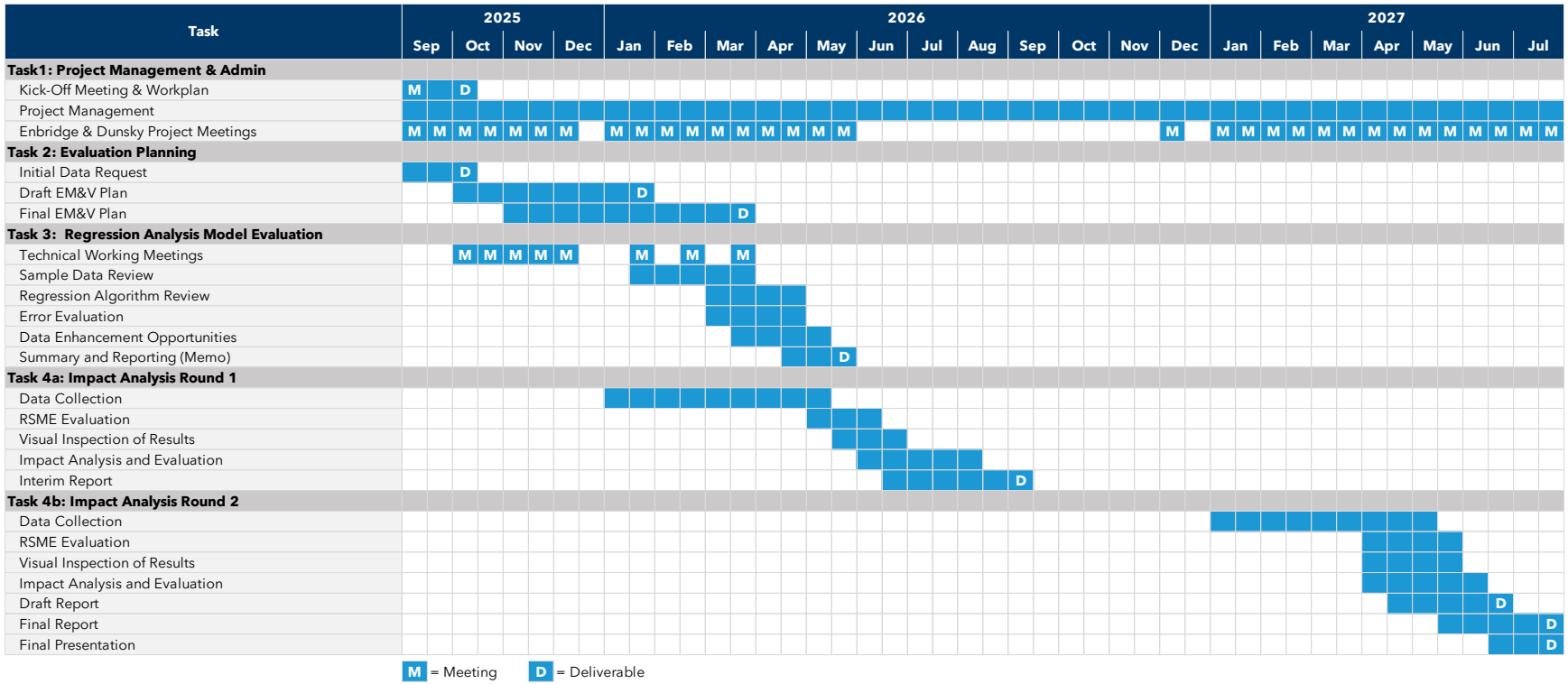
8.8 DR Evaluation Conclusions

The DR evaluation will quantify short term, event-based reductions in residential gas demand achieved through smart thermostat control. Expected outcomes:

- Verified peak-hour demand reductions during cold weather events and extrapolated design temperature peak hour reductions.
- Assessment of rebound magnitude/significance and event consistency.
- Insight into customer behavioural response (overrides under varying conditions).

9. Expected Evaluation Timeline

The following high-level timeline and deliverables are expected for this project.



10. Reporting

Reporting will summarize findings from the evaluation activities carried out under the SLH IRP Pilot. Each report will include quantitative results, methodological updates, and qualitative insights to inform future Integrated Resource Planning (IRP) applications.

10.1 Interim Report

The Interim Report will provide the first-year impact assessment and evaluation results from the SLH IRP Pilot. It is intended to:

1) present early findings on ETEE and DR program performance;
2) summarize data quality, participation levels, and baseline regression model results;
3) identify preliminary peak-hour load reduction estimates;
4) document lessons learned from data handling, measurement, and evaluation processes.

The Interim Report will be produced after the first full heating season of pilot operation (Q3-2026).

10.2 Final Report

The Final Report will present the complete findings and conclusions from the SLH IRP Pilot once data collection and evaluation activities are complete. This report will serve as the definitive documentation of pilot performance, providing actionable insights for potential scaling of IRPAs. This report will also include the second-year impact assessment and evaluation results from the Pilot.

Contents

- Summary of pilot design, participation, and implementation.
- Final regression model results and validated impact estimates for ETEE and DR measures.
- Discussion of Pilot successes, challenges, and recommendations for future IRP deployment.

The Final Report will be completed in mid-2027, following the conclusion of two full evaluation years and incorporating results from both rounds of analysis (Spring 2026 and Spring 2027).



"NO DISCLAIMERS" POLICY

This report was prepared by Dunsky Energy + Climate Advisors, an independent firm focused on the clean energy transition and committed to quality, integrity and unbiased analysis and counsel. Our findings and recommendations are based on the best information available at the time the work was conducted as well as our experts' professional judgment.
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