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September 12, 2024

Sent by EMAIL, RESS e-filing

Ms. Nancy Marconi
Registrar
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: EB-2024-0139: EPCOR Natural Gas Limited Partnership's ("EPCOR")
2024 Annual Gas Supply Plan Updates - Aylmer and Southern Bruce**

In accordance with the OEB's direction for the above noted proceeding, please find EPCOR's comments in response to the August 23, 2024 recommendations provided by Pollution Probe.

Pollution Probe recommends that the OEB:

- 1. Recognize the importance and role for the Gas Supply Plan and Portfolio to evolve more urgently on an annual basis to align with Energy Transition demands, Capital Planning rationalization (including more prudent IRP and stranded assets option mitigation).*

While the topic of Energy Transition is prevalent and important, utilities are still awaiting clear direction from the Ministry of Energy and the Ontario Energy Board through the Natural Gas Policy Statement. While there are different views on the future of Natural Gas in the province, EPCOR cannot speculate on what this statement will include. EPCOR's Gas Supply Plan is based on a 3 year (Southern Bruce) and 5 year (Aylmer) forward looking window based on actual expected usage trends and customer needs.

- 2. Add better structure and transparency, specifically adding an adjudicative hearing element with Commissioners to the annual process including greater direction to the gas utilities on enhancements required to meet the principles notes above and the rapidly changing environment in Ontario.*

EPCOR notes that the topics of Capital Planning, stranded assets etc.. are already challenged and adjudicated in Cost of Service filings and believes it would be inefficient and most costly to expand the scope of the Gas Supply plan to include these topics in an adjudicative setting on an annual basis.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

Tim Hesselink
Senior Manager, Regulatory Affairs
EPCOR Natural Gas Limited Partnership
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