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Enbridge Gas Inc.
 P.O. Box 2001
 50 Keil Drive N.
 Chatham, Ontario, N7M 5M1
 Canada

November 27, 2019

BY RESS, EMAIL AND COURIER

Ms. Christine Long
 Board Secretary
 Ontario Energy Board
 2300 Yonge Street, 27th Floor
 Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc.
 Ontario Energy Board File No.: EB-2019-0247
 2020 Federal Carbon Pricing Program Application**

Further to the Application and Evidence filed by Enbridge Gas on November 18, 2019, enclosed please find corrections to the following:

Exhibit	Original	Correction
Cover Letter	<p>“Enbridge Gas is also seeking OEB approval to dispose of the 2019 balances recorded in its FCPP-related deferral and variance accounts effective April 1, <u>2019</u>.”</p> <p>Enbridge Gas requests that the OEB issue orders granting the approvals requested on a final basis by February 13, <u>2019</u>. Should the OEB determine that it is not possible to review and grant the approvals requested by such date, Enbridge Gas requests that the OEB grant approval of just and reasonable rates effective April 1, <u>2019</u> on an interim basis by February 13, <u>2019</u>.”</p>	<p>“Enbridge Gas is also seeking OEB approval to dispose of the 2019 balances recorded in its FCPP-related deferral and variance accounts effective April 1, <u>2020</u>.”</p> <p>Enbridge Gas requests that the OEB issue orders granting the approvals requested on a final basis by February 13, <u>2020</u>. Should the OEB determine that it is not possible to review and grant the approvals requested by such date, Enbridge Gas requests that the OEB grant approval of just and reasonable rates effective April 1, <u>2020</u> on an interim basis by February 13, <u>2020</u>.”</p>

Application Letter	Page 3, paragraph 7: “7. If the OEB considers that it is not possible to provide the approvals sought by February 13, <u>2019</u> , then Enbridge Gas requests that the OEB approve its proposed rates on an interim basis by February 13, <u>2019</u> to avoid the accumulation of unbilled and uncollected amounts from customers that could result in a larger impact on bills when such amounts are recovered in the	Page 3, paragraph 7: “7. If the OEB considers that it is not possible to provide the approvals sought by February 13, <u>2020</u> , then Enbridge Gas requests that the OEB approve its proposed rates on an interim basis by February 13, <u>2020</u> to avoid the accumulation of unbilled and uncollected amounts from customers that could result in a larger impact on bills when such amounts are recovered in the
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If you have any questions, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications

c.c.: EB-2018-0205 (Intervenors)



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November 18, 2019

BY RESS, EMAIL AND COURIER

Ms. Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc.
Ontario Energy Board File No.: EB-2019-0247
2020 Federal Carbon Pricing Program Application**

Enclosed is the application and pre-filed evidence of Enbridge Gas Inc. (“Enbridge Gas”) for its 2020 Federal Carbon Pricing Program (“Application”).

Enbridge Gas is filing this Application in order to comply with the federal *Greenhouse Gas Pollution Pricing Act* (the “GGPPA”). A federal carbon pricing program (“FCPP”) under the GGPPA applies to any province or territory that requested it or that did not have an equivalent carbon pricing system in place by January 1, 2019. On October 23, 2018, the federal government of Canada confirmed that the GGPPA applies to Ontario. The FCPP is composed of two elements: (i) a charge on fossil fuels (the “Federal Carbon Charge”) imposed on distributors, importers and producers effective April 1, 2019; and (ii) an Output-Based Pricing System (“OBPS”) for prescribed industrial facilities effective January 1, 2019.

Enbridge Gas is seeking OEB approval of just and reasonable rates effective April 1, 2020 for the EGD rate zone and Union rate zones, to recover the costs associated with the GGPPA as a pass-through to customers. Enbridge Gas is also seeking OEB approval to dispose of the 2019 balances recorded in its FCPP-related deferral and variance accounts effective April 1, 2020. /C

Enbridge Gas requests that the OEB issue orders granting the approvals requested on a final basis by February 13, 2020. Should the OEB determine that it is not possible to review and grant the approvals requested by such date, Enbridge Gas requests that the OEB grant approval of just and reasonable rates effective April 1, 2020 on an interim basis by February 13, 2020. Given the significance of Enbridge Gas’s obligations under the GGPPA and considering the magnitude of rate increases, it is appropriate to avoid continued accumulation of unbilled and uncollected amounts from customers that could result in a larger impact on bills when such amounts are recovered in the future. /C /C /C

Enbridge Gas will file a draft rate order for final rates following issuance of the OEB's Decision and Order for this Application.

Enbridge Gas's application and pre-filed evidence will be made available on Enbridge Gas's website at:

<https://www.uniongas.com/about-us/company-overview/regulatory>; and
<https://www.enbridgegas.com/Regulatory-Proceedings>.

If you have any questions, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications

c.c.: EB-2018-0205 (Intervenors)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B;

AND IN THE MATTER OF an application by Enbridge Gas Inc., for an order or orders for gas distribution rate changes and clearing certain non-commodity deferral and variance accounts related to compliance obligations under the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186.

ENBRIDGE GAS INC.

1. Enbridge Gas Inc. ("Enbridge Gas"), the Applicant, was formed by the amalgamation of Enbridge Gas Distribution Inc. and Union Gas Limited on January 1, 2019 pursuant to the *Ontario Business Corporations Act*, R.S.O. 1990, c. B. 16. Enbridge Gas carries on the business of distributing, transmitting and storing natural gas within Ontario.
2. On June 21, 2018, the *Budget Implementation Act, 2018, No. 1* received Royal Assent. Included in Part V is the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186 ("GGPPA"). Under the GGPPA, a federal carbon pricing program (the "FCPP") applies to any province or territory that requested it or that did not have an equivalent carbon pricing system in place by January 1, 2019. On October 23, 2018, the federal government confirmed that the GGPPA would apply to Ontario.
3. The FCPP is composed of two elements: (i) a charge on fossil fuels (the "Federal Carbon Charge") imposed on distributors, importers and producers effective April 1, 2019; and (ii) an Output-Based Pricing System ("OBPS") for prescribed industrial facilities effective January 1, 2019. Enbridge Gas's operations as an integrated natural gas utility in Ontario fall under the purview of the GGPPA, which result in the following costs being incurred:
 - a. Incremental administration and program costs;

- b. Customer-related Federal Carbon Charge costs for volumes delivered by Enbridge Gas to its residential, commercial and industrial customers who are not covered under the OBPS; and
 - c. Facility-related costs (“Facility Carbon Charge”) arising from Enbridge Gas’s facilities and operation of its gas distribution system.

4. In its 2019 FCPP application and pre-filed evidence (EB-2018-0205) (“2019 Application”), Enbridge Gas sought interim Ontario Energy Board (“OEB”) approval by February 28, 2019 of just and reasonable rates effective April 1, 2019 for the EGD rate zone and Union rate zones, to recover the costs associated with the GGPPA as a pass-through to customers. On February 28, 2019, the OEB issued an Interim Decision and Accounting Orders: (i) approving the establishment of FCPP-related accounts and Accounting Orders on an interim basis; and (ii) denying interim rates effective April 1, 2019. The reason that the OEB gave for not approving interim rates was to “...consider the comments of stakeholders and submissions of parties prior to making a determination on any new charges and related bill presentation issues.”¹ The OEB subsequently “...generally found the proposals by Enbridge Gas reasonable...”² approving forecasts, rate riders and charges as filed and finalizing the establishment of new FCPP-related deferral and variance accounts.³

5. Similar to its 2019 Application and in accordance with the 2019 Application OEB Decision and Accounting Orders, Enbridge Gas hereby applies to the OEB, pursuant to the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B (“OEB Act”), for:
 - a. an order or orders allowing it to charge customers a Federal Carbon Charge on a volumetric basis, in the amount of the Federal Carbon Charge required to be paid pursuant to the GGPPA, effective April 1, 2020;
 - b. an order or orders approving or fixing just and reasonable rates for all Enbridge Gas rate zones (EGD, Union North and Union South),⁴ effective

¹ EB-2018-0205, Interim Decision and Accounting Orders, February 28, 2019, p. 4.

² EB-2018-0205, Decision and Order, July 4, 2019, pp. 1-2.

³ EB-2018-0205, Decision and Order, July 4, 2019, pp. 5-6, 9-10 and 12.

⁴ Collectively, the Union North and Union South rate zones are referred to as the “Union rate zones”.

- c. April 1, 2020, to allow Enbridge Gas to recover other costs (including Facility Carbon Charge costs) in compliance with the GGPPA; and
 - d. approval of 2019 balances for all FCPP-related deferral and variance accounts, for all Enbridge Gas rate zones, as set out in Exhibit C and for an order or orders to dispose of those balances.
6. To meet the April 1, 2020 effective date, Enbridge Gas requests that the OEB approve its proposed rates and 2019 FCPP-related deferral and variance account balances for disposition no later than February 13, 2020. The nature of the FCPP charges and bill presentment are not at issue in this case as in the 2019 Application.
7. If the OEB considers that it is not possible to provide the approvals sought by February 13, 2020, then Enbridge Gas requests that the OEB approve its proposed rates on an /C interim basis by February 13, 2020 to avoid the accumulation of unbilled and uncollected /C amounts from customers that could result in a larger impact on bills when such amounts are recovered in the future.
8. Enbridge Gas further applies to the OEB for all necessary orders and directions concerning pre-hearing and hearing procedures for the determination of this application.
9. This application is supported by written evidence that has been filed with this application and may be amended from time to time as circumstances may require.
10. The persons affected by this application are the customers resident or located in the municipalities, police villages, Indigenous communities and Métis organizations served by Enbridge Gas, together with those to whom Enbridge Gas sells gas, or on whose behalf Enbridge Gas distributes, transmits or stores gas. It is impractical to set out in this application the names and addresses of such persons because they are too numerous.
11. Enbridge Gas requests that the OEB's review of this application proceed by way of written hearing in English.

12. Enbridge Gas requests that all documents relating to this application and its supporting evidence, including the responsive comments of any interested party, be served on Enbridge Gas and its counsel as follows:

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive North
Chatham, Ontario N7M 5M1

Attention: Adam Stiers
Technical Manager, Regulatory Applications – Regulatory Affairs
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-and-

Attention: Tania Persad
Senior Legal Counsel
Telephone: (416) 495-5891
Fax: (416) 495-5994
Email: tania.persad@enbridge.com

Dated: November 18, 2019

Enbridge Gas Inc.

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications – Regulatory Affairs