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May 1, 2020

VIA EMAIL AND RESS E-FILING

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

Dear Ms. Long:

**Re: EB- 2020-0076 - EPCOR Natural Gas Limited Partnership ("ENGLP")
2020 Federal Carbon Pricing Program Application – updated evidence and further
relief requested with respect to ENGLP Southern Bruce franchise area**

Please find enclosed supplementary information with respect to ENGLP's 2020 Federal Carbon Pricing Program Application filed on February 27, 2020 (the "Application"). The Application included evidence only with respect to ENGLP's Aylmer application. This supplementary application and evidence is in respect of the ENGLP Southern Bruce franchise area.

ENGLP seeks to be responsive to the Ontario Energy Board's (Board) Decision of March 26, 2020 to make requests for interim rates in a timely manner, and the Board's letter of April 3, 2020 in this proceeding.

This evidence update is intended to facilitate the Board's review of ENGLP's request for interim rates for the Southern Bruce franchise area. ENGLP will provide the balance of exhibits and evidence with respect to volumes forecast, forecast administration costs for 2020, and facility costs for 2020 as part of a further evidence update.

Interim rates request – Southern Bruce franchise area

ENGLP is seeking Board approval of just and reasonable rates for its Southern Bruce operations to recover costs associated with the *Greenhouse Gas Pollution Pricing Act* (GGPPA) from customers on a pass through basis.

ENLGP seeks the following relief in this update to the Application:

- (a) That the interim Federal Carbon Charge (5.87 cents per m3) rate approved in the Board's Interim Decision and Order¹ in this proceeding be extended to apply to ENGLP's Southern

¹ EB-2020-0076, Interim Decision and Order, dated March 26, 2020, at page 3.

Bruce franchise area. For convenience and ease of administration, the requested effective date for this interim rate request throughout this application is noted as June 1, 2020.

- (b) Subject to further evidence to be filed shortly in this proceeding with respect to 2020 forecast administration costs, for a final order approving or fixing just and reasonable rates, effective April 1, 2020, to allow ENGLP to recover the other costs associated with compliance with the GGPPA.
- (c) That a Facility Carbon Charge (0.0000 cents per m3) be approved for the Southern Bruce franchise area.

ENGLP is aware that the updated Federal Carbon Charges under the GGPPA took effect April 1, 2020; however, at this time ENGLP Southern Bruce serves no customers. In letters of March 6, 2020 and March 25, 2020 to the OEB, ENGLP confirmed that it will not have any customers connected prior to mid-June 2020, and therefore will not be billing and collecting either charge prior to that time. Further, the first two customers that will connect to ENGLP's Southern Bruce distribution system are Rate 16 large volume customers who will qualify for emissions exemption certificates, and therefore the Federal Carbon Charge is not expected to apply, and ENGLP does not foresee collecting amounts for subsequent remittal. These customers are expected to apply for the relevant exemption certificates and provide these to the ENGLP.

Given that ENGLP's Southern Bruce franchise area has not commenced operation, there are no balances in deferral and variance accounts for 2019 and associated clearances to consider for the purposes of adjusting bill impacts.

Should you have any questions, please contact me directly.

Sincerely,



Vince Cooney, P.Eng, MBA
Senior Manager, Regulatory Affairs, Ontario
EPCOR Utilities Inc.
VCooney@epcor.com
(647) 730-0013

cc. All registered intervenors in EB-2020-0076

EB-2020-0076

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, as amended (the “**Act**”);

AND IN THE MATTER OF an Application by EPCOR Natural Gas Limited Partnership for an Order under section 36(1) of the Act for an order or orders for rates to recover costs resulting from the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186.

**APPLICATION AND EVIDENCE UPDATE OF
EPCOR NATURAL GAS LIMITED PARTNERSHIP**

1. EPCOR Natural Gas Limited Partnership (“**ENGLP**”) is a privately-owned utility that sells and distributes natural gas within the province of Ontario. ENGLP’s Southern Bruce utility will supply natural gas to the communities within the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss. Enbridge Gas is expected to provide upstream transportation services to ENGLP’s Southern Bruce utility. It is this utility, or ENGLP’s “Southern Bruce operations” which are the subject of this evidence update to the EB-2020-0076 Application (the “Application”).
2. This further evidence is provided pursuant to the *Greenhouse Gas Pollution Pricing Act* (the “**GGPPA**”). Among other things, the GGPPA applies a charge, by volume, on certain types of fuel and combustible waste, including marketable natural gas, effective April 1, 2019 (the “**Fuel Charge**”).
3. On February 27, 2020, ENGLP filed the initial application and evidence for its Aylmer operations (the “**Initial Application**”).
4. On March 26, 2020, the Ontario Energy Board (“**OEB**” or “**Board**”) issued an Interim Decision and Order in this proceeding granting approval of interim rates with respect to Federal Carbon Charges for ENGLP’s Aylmer operations.
5. On April 3, 2020, the Ontario Energy Board (Board) issued a letter clarifying the Board’s intent to delay issuing a notice until to both operating areas had provided application and evidence underpinning rate changes pursuant to the GGPPA.
6. ENGLP provides background details in the Initial Application. The details of the Initial Application underpin the requests in this update to the Initial Application and evidence for the Southern Bruce franchise area.
7. As a result of the GGPPA, ENGLP will incur the following costs:

- (a) Incremental administration costs;
 - (b) Customer-related Fuel Charge costs which ENGLP will be required to pay under the GGPPA for volumes delivered by ENGLP to its residential, commercial and industrial customers who have not provided ENGLP with a valid Fuel Charge Exemption Certificate, along with any resulting increase to financing costs; and
 - (c) Facility-related costs arising from ENGLP's facilities and operation of its gas distribution system, along with any resulting increase to financing costs.¹
- 8. ENGLP made an application with respect to its forecast 2019 GGPPA costs on March 8, 2019 in respect of its Aylmer operations and received a Decision and Order on July 18, 2019 in OEB proceeding EB-2019-0101 (the "**2019 Application**").²
 - 9. Through its decision and orders dated November 28, 2019, the Board approved ENGLP's application for its Southern Bruce franchise area (EB-2018-0264) to establish rates for the period from January 1, 2019 to December 31, 2028.
 - 10. Although rates were approved for ENGLP Southern Bruce for the 2019 rate year, no application was made pursuant to the GGPPA to implement Federal Carbon Charges for 2019 because ENGLP Southern Bruce is a greenfield utility which at the time of this application had yet to connect its first customer, and will not connect its first customer prior to April 1, 2020.
 - 11. On March 18, 2020, ENGLP filed for rates effective January 1, 2020 as part of its EB-2019-0264 incentive rates application ("**IRM**") applying its approved incentive rate formula for the stability period ending December 31, 2028.
 - 12. In light of the above, for the purposes of computing bill impacts ENGLP has (a) treated the charge of 3.91 cents per m3 from April 1, 2020 to March 31, 2020 as if it were in effect and being collected from customers, and (b) computed bill impacts over and above its rates proposed as part of the March 18, 2020 IRM application.
 - 13. ENGLP expects to connect its first customers, two industrial Rate 16 customers, in June 2020. These two customers are expected to secure exemption certificates from the Canada Revenue Agency ("**CRA**").
 - 14. Accordingly, ENGLP applies to the OEB pursuant to section 36(1) of the Act:
 - (a) For an order or orders allowing ENGLP to charge customers a fuel charge on a volumetric basis, in the amount of the Fuel Charge required to be paid pursuant to the GGPPA, effective prior to the expected connection of its first customer in June 2020; and

¹ These costs are forecasted to be zero for 2020.

² EB-2019-0101.

- (b) For an order approving or fixing just and reasonable rates, effective prior to the expected connection of its first customer in June 2020, to allow ENGLP to recover the other costs associated with compliance with the GGPPA. For convenience and ease of administration, the requested effective date throughout this application is noted as June 1, 2020.
15. There have been no entries to the deferral and variance accounts approved in the main Southern Bruce rates case. Therefore, the balances in these accounts are zero. Accordingly, ENGLP does not bring forward audited balances in this proceeding.
16. ENGLP further applies for all necessary orders and directions concerning pre-hearing and hearing procedures for the determination of this portion of the application for the Southern Bruce franchise area. This update to the application is supported by written evidence filed with this application, which may be amended from time to time.
17. The persons affected by this application and evidence update include all of ENGLP's future residential, commercial and industrial customers in its Southern Bruce franchise area.
18. ENGLP requests that the OEB issue orders granting the Federal Carbon Charge and Facility Carbon Charge approved in ENGLP's Aylmer franchise area on an interim basis to the Southern Bruce franchise area prior to the connection of its first customer in June 2020.
19. ENGLP submits that, if necessary, granting interim rates does not prejudice any party to this proceeding. ENGLP's first two customers are likely to hold exemption certificates and therefore ENGLP will not collect the Federal Carbon Charge from these two customers. Further, forecast amounts to be collected with respect to Facility Carbon Charges for 2020 are zero.
20. The address for service for ENGLP is:

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Toronto, ON M5J 2H7
Tel: 647-730-0013
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and

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21. It is ENGLP's preference that this proceeding take place by way of a written hearing.

DATED at Toronto, Ontario, this 1st day of May, 2020.

EPCOR NATURAL GAS LIMITED PARTNERSHIP

Vince Cooney, P.Eng, MBA
Senior Manager, Regulatory Affairs, Ontario



OVERVIEW

1. The purpose of this evidence is to summarize EPCOR Natural Gas Limited Partnership's ("ENGLP") application for just and reasonable rates for its Southern Bruce operations to recover the costs associated with the federal Greenhouse Gas Pollution Pricing Act, S.C. 2019, c. 12, s. 186 (the "GGPPA") as a pass-through to customers.

2. The evidence is organized as follows:

Exhibit	Description	Notes
Exhibit A-S	Overview	
Exhibit B-S	Customer Related Volumes and Costs	Per Exhibit 6 of EB-2018-0264, filed April 12, 2019
Exhibit C-S	Administrative Costs	To be filed as later evidence update
Exhibit D-S	Deferral and Variance Accounts	
Exhibit E-S	Cost Recovery	Not applicable. No 2019 costs.

1.0 Background: the *Greenhouse Gas Pollution Pricing Act*

3. For Background please refer to Exhibit A, section 1.0 of the Application.

1.1 ENGLP's obligations under the GGPPA

4. Refer to Exhibit A, Section 1.1 of the Application.

1.2 Anticipated Costs of Compliance

1.2.1 Customer Charges

5. As outlined in Exhibit B, ENGLP forecasts the 2020 customer related costs (for the period from April 1, 2020 to December 31, 2020) associated with the GGPPA for its Southern Bruce, Ontario operations to be **\$109,441**. As is the case with its Aylmer operations, ENGLP Southern Bruce will present these charges as a separate line item on customers' bills. As set out in more detail in Exhibit E-S, ENGLP proposes a charge of 5.87 cents/m³ from April 1, 2020 to December 31, 2020. Subject to guidance from the OEB as discussed further below, ENGLP would prefer an



interim order effective June 1, 2020, allowing ENGLP to commence charging the new rates prior to connecting its first customers in June 2020.

1.2.2 Company Use Volumes and Costs

6. Forecast company-use volumes are zero for 2020. ENGLP proposes to charge all customer classes a Facility Carbon Charge of 0.0000 cents per m3.

7. The costs associated with these company-use volumes (forecast as zero in this application) will be included in delivery charges on customers' bills.

1.2.3 Administrative Costs

8. ENGLP will provide this forecast as part of an evidence update. For 2020, ENGLP foresees the incremental combined administration of its two franchise areas to be minimal. In the future, as ENGLP's operations grow, ENGLP intends to closely review and consider administrative costs.

1.2.4 Upstream Costs

9. As outlined in its 2020 Federal Carbon Pricing Program application EB-2019-0247, Enbridge has applied for recovery of its Facility Carbon Charge costs from all customers regardless of whether the customer holds an Exemption Certificate. Enbridge further proposes to add the Facility Carbon Charge to its current approved delivery or transportation charges on customer's bills. ENGLP will incur additional upstream costs associated with Enbridge's Facility Carbon Charge costs in relation to ENGLP's M17 contract with Enbridge.¹

10. Any increased transportation or commodity costs from Enbridge in relation to the GGPPA, such as those in relation to the M17 contract, have not been included in the costs identified in this Application.

11. Minimal Enbridge Facility Carbon Charge costs are included in the M17 transportation charges included in its distribution rates.² These minimal pass-through costs will be captured in ENGLP's PGTVA accounts for customers in Rates 1, 6, 11, and 16.

¹ EB-2019-0183, Decision and Order, April 9, 2020.

² \$0.002/GJ.



1.3 Customer Communications

12. ENGLP will utilize existing communication methods such as bill inserts, bill messaging and webpage content to provide information related to the GGPPA to its customers, including communication on the program and the associated changes to ENGLP bill.

APPROVALS REQUESTED

13. ENGLP proposes to treat all prudently-incurred costs of compliance with the GGPPA as a pass-through to customers. The Fuel Charge is the primary driver for the costs for which ENGLP seeks to recover and is established by the GGPPA.

14. ENGLP requests that the OEB issue orders granting the Federal Carbon Charge approved in ENGLP's Aylmer franchise area on an interim basis to the Southern Bruce franchise area prior to the connection of its first customer in June 2020. For convenience and ease of administration, the requested effective date throughout this application is noted as June 1, 2020.

15. ENGLP will provide additional evidence underpinning a request for incremental administration costs for 2020, if any, for disposition and inclusion in future rates and on a final basis with respect to 2020 Federal Carbon Charges.

16. ENGLP submits that, if necessary, granting interim rates does not prejudice any party to this proceeding. Further, ENGLP's first two customers are likely to hold exemption certificates and therefore ENGLP does not expect to collect Federal Carbon Charges from these two customers.

17. ENGLP will record costs and variances resulting from compliance with the GGPPA using the deferral and variance accounts established as part of the decision on the settlement proposal in the 2019-2028 rates proceeding³:

- (a) Greenhouse Gas Emissions Administration Deferral Account ("GGEADA");
- (b) Federal Carbon Charge – Customer Variance Account ("FCCCVA"); and
- (c) Federal Carbon Charge – Facility Variance Account ("FCCFVA").

While the effective date of each of these accounts are January 1, 2019, there are no accounting entries prior to 2020, given that a Rate Order was not issued until January 9, 2020.

³ EB-2018-0264, Decision on Settlement Proposal and Procedural Order No. 6, dated October 3, 2019.



ADMINISTRATION

Relevant information is presented in the table below:

Table of Contents	Please See Exhibit A, Tab 1, Schedule 2
Application Primary Contact	Vince Cooney Senior Manager, Regulatory Affairs, Ontario Commercial Services EPCOR Utilities Inc. 55 University Avenue, Suite 710 Toronto, ON M5J 2H7 Tel: 647-730-0013 E-mail: vcooney@epcor.com
Legal Representation	Daniela O'Callaghan EPCOR Utilities Inc. 2000 – 10423-101 St. NW Edmonton, AB T5H 0E8 Tel: 780-412-4081 Fax: 780-441-7118 E-mail: docallaghan@epcor.com
Applicant's Website	https://www.epcor.com/about/news-announcements/notices/Pages/default.aspx
Bill Impacts	<p>The bill impact for the year running from April 1, 2020 to March 31, 2021 for an existing residential customer with annual consumption of 2,149 m3 is an increase of \$42.12 over customer bills without the charges applied.</p> <p>The bill impact for the year running from April 1, 2020 to March 31, 2021 for an existing residential customer with annual consumption of 2,066 m3 is an increase of \$40.49 over customer bills without the charges applied.</p>
Approvals Requested	<ul style="list-style-type: none"> • An interim order allowing ENGLP to charge customers a fuel charge on a volumetric basis, as was approved in the Southern Bruce • an order or orders allowing ENGLP to charge customers a fuel charge on a volumetric basis, in the amount of the Fuel Charge required to be paid pursuant to the GGPPA (as of April 1, 2020), effective June 1, 2020.



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ENGLP 2020 FORECASTED VOLUMES AND VOLUME RELATED COSTS

1. This exhibit provides ENGLP's forecast of 2020 customer related and facility volumes and associated costs related to compliance with the GGPPA for its Southern Bruce operations.
2. ENGLP Southern Bruce filed its forecast throughput volumes under the Common Infrastructure Plan (CIP) at Exhibit 3 of the 2019-2028 rate application (EB-2018-0264) on October 3, 2018. In that application, construction was intended to be completed with the first customers connected in 2019.
3. Since that time, ENGLP Southern Bruce updated its EB-2018-0264 application as part of Exhibit 6: *Revenue Deficiency/Sufficiency* which addressed changes to the 10-year volume before taking into account the impact of delay in approval of the Leave to Construct Application, and corresponding reduction in customer connections in 2019, 2020, and 2021.¹ The only customers expected to be connected in 2019 were the two industrial customers.
4. The table below captures the updated number of customers for 2020 per Exhibit 6 of the 2019-2028 rate application.

Table 6-4 Customer Connections CIP vs New Construction Schedule

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10
Description	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Row 1 Customer Connections CIP	979	2,583	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278
Row 1 New Construction Schedule	2	1,292	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278

5. At the time of filing this evidence, and due to further delays, the expectation is that the first two industrial customers, who are expected to hold exemption certificates from the Federal Carbon Charge, are expected to be connected to the system in June 2020, with residential and

¹ EB-2018-0264, Exhibit 6, Tab1, Schedule 1, page 5, Table 6-4 details the revised year-end customer connection schedule.



other classes of customers connecting in population centres such as Kincardine closer to the end of 2020.

6. It is in this context that the volume forecasts produced for and available to ENGLP for the purposes of determining amounts collected in 2020 are likely to overstate throughput volumes and the amounts actually collected by ENGLP in respect of its Southern Bruce operations.

7. Excluding Rate 16, ENGLP forecasts a total January 1, 2020 to December 31, 2020 volume of 1,864,420 m³. It is not necessary to pro-rate these annual volumes to reflect April 1, 2020 start date because all of the connections and associated volumes will be incurred after April 1, 2020. The volume associated forecast total cost for 2020 of **\$109,441**.²

1.0 Forecasted Customer Related Volumes and Associated Costs

8. For its Southern Bruce operations, ENGLP's 2020 forecasted customer related volumes subject to the GGPPA is 1,864,420 m³. Rate 16 customers hold or are expected to hold valid exemption certificates from the Canada Revenue Agency. The forecast volumes are based on ENGLP's 2019-2028 Rates Application (EB-2018-0264).³

9. Applying the April 1, 2020 Fuel Charge outlined in Exhibit A-S, Tab 1, Schedule 1, of 0.0587/m³, results in an associated forecast 2020 customer related cost of **\$109,441**. These forecasted costs are subject to change based on actual distribution volumes.

10. ENGLP expects to receive Exemption Certificates for both Rate 16 customers (7Acres and Greenfield Ethanol) and these forecast volumes have been excluded from the customer related volume forecast.

11. Detailed 2020 forecast distribution volumes subject to the Fuel Charge for all rate classes are provided in Exhibit B-S, Tab 2, Schedule 1, and the cost calculations are provided in Exhibit B-S, Tab 2, Schedule 3.

² As noted, ENLGP Southern Bruce expects to make the majority of non-Rate 16 attachments in November and December 2020. Actual Federal Carbon Charge amounts collected are likely to be a further fraction of the amount stated here.

³ EB-2018-0264, Exhibit 3, Tab 1, Schedule 2, Page 2, Table 3-9.



1.1 Forecasted Facility Related Volumes and Associated Costs

12. ENGLP Southern Bruce has no natural gas vehicles and does not intend to have natural gas vehicles for its Southern Bruce operations. ENGLP leases its current facilities, and therefore there are no facility related volumes to recover. ENGLP will include UFG in its forecasted 2020 facility related volumes at 0.0%, consistent with its evidence in the 2019-2018 rates proceeding.⁴ Consequently, \$0 is included for UFG in the facility related cost estimate for 2020.

13. As a result, ENGLP is proposing to do the following: (a) have a no facility carbon charge, or (b) show a facility carbon charge of 0.0000 cents/m³ for 2020 on its Tariffs of Rates and Charges. For the purposes of this evidence, ENGLP does not show a Facility Carbon Charge in the Tariffs of Rates and Charges.

14. While ENLGP forecasts zero company-use volumes in 2020, ENGLP is required to and will remit to the Canada Revenue Agency the Fuel Charge for any company-use volumes in 2020, and will do so in accordance with the GGPPA, as necessary.

⁴EB-2018-0264, Exhibit 4, Tab 1, Schedule 1, at page 5.



Customer Related Volume Forecast - January 1, 2020 to December 31, 2020

Line No.	Rate Class	Forecast Volume m3 2018 Filing	Forecast Volume m3 Updated April 2019 (1)
1	Rate 1	4,014,142	1,456,357
2	Rate 6	887,258	323,480
3	Rate 11	338,332	84,583
4	Rate 16	23,411,347	23,411,347
		28,651,079	25,275,767
	OBPS Participant & Other Exempt Volumes (2)		
5	Rate 16	23,411,347	23,411,347
6	Total (3)	<u>5,239,732</u>	<u>1,864,420</u>

Notes:

(1) EB-2018-0264, Exhibit 6, Table 6-12, Col. 3, filed April 12, 2019.

(2) Exemption certificates are expected to be secured for the two Rate 16 customers.

Assumes no other OBPS Participants for the purposes of the 2020 filing.

(3) therefore no pro-ratio of volumes is required to compute volumes from April 1, 2020 to December 31, 2020.



Facility Related Volume Forecast – April 1, 2020 to December 31, 2020

Line No.		Net Volume	Federal Carbon Charge	Federal Carbon Cost ³	
			\$/m ³	\$	
	Company Use				
1	Unaccounted For Gas (1)	0	0.0587	0	
2	Buildings (2)	0	0.0587	0	
3	NGV Fleet (3)	0	0.0587	0	
4	Unit Rate, all customer classes			0.0000	cents/m3

(1) Assumes 0% UFG

(2) All buildings are leased

(3) No fleet vehicles



**Customer and Facility-Related Costs – April 1, 2020 to
December 31, 2020**

Line No.	Particulars	Period	2020 Forecast
Customer-Related Costs			
3	Customer-Related Forecast Volume	Apr 1, 2020 to Dec 31, 2020	1,864,420 (1)
4	Federal Carbon Charge (\$/m3)		0.0587
5	Total Customer-Related Costs (\$)		109,441
Facility-Related Costs			
8	Facility-Related Forecast Volume	Apr 1, 2020 to Dec 31, 2020	Nil (2)
9	Federal Carbon Charge (\$/m3)		0.0587
10	Total Facility-Related Costs (\$)		-
11	Total Cost Forecast		109,441

(1) Exhibit B, Tab 2, Schedule 1

(2) Exhibit B, Tab 2, Schedule 2



2020 ADMINISTRATION COSTS – SOUTHERN BRUCE

Exhibit will be filed as part of an evidence update



ENGLP GREENHOUSE GAS DEFERRAL AND VARIANCE ACCOUNTS

1. The purpose of this exhibit is to summarize existing deferral/variance accounts for use associated with ENGLP's compliance with the GGPPA for its Southern Bruce operations.
2. ENGLP currently has three approved and existing Greenhouse Gas (GHG) related deferral/variance accounts:
 - Greenhouse Gas Emissions Administration Deferral Account effective January 1, 2019 ("GGEADA");
 - Federal Carbon Charge – Customer Variance Account effective April 1, 2019 ("FCCCVA"); and
 - Federal Carbon Charge – Facility Variance Account effective April 1, 2019 ("FCCFVA").
3. ENGLP's deferral and variance accounts were approved as part of the Decision on Settlement and Procedural Order No. 6 issued by the Board on October 3, 2019. The purpose of these accounts is to record the differences between ENGLP's actual costs for its Southern Bruce operations associated with the obligations resulting from federal and/or provincial regulations related to GHG emission requirements and the amounts recovered in the rates approved by the Board.
4. There are no balances in these accounts as of December 31, 2019, and therefore no balances to dispose of in this proceeding.
5. The purpose of the GGEADA is to record ENGLP's administrative costs associated with its obligations under federal and/or provincial regulations related to GHG emission requirements, the FCCCVA addresses costs related to the obligations arising from natural gas ENGLP delivers to its customers while the FCCFVA addresses costs arising from the obligations related to ENGLP's facilities.
6. Simple interest is calculated on the GGEADA, FCCCVA, and FCCFVA balances, at the applicable Board approved short-term interest rate, on the monthly opening balances using the interest rate methodology as approved in EB-2006-0117.



7. The allocation and disposition of the 2020 account balances related to the Federal GGPPA will be addressed in ENGLP's 2021 FCCP application for its Aylmer and Southern Bruce operations.



2020 FEDERAL CARBON PRICING PROGRAM COST RECOVERY

1. This exhibit provides details of ENGLP's proposed recovery of the forecasted 2020 costs related to the GGPPA, outlining ENGLP's proposal to incorporate the impacts of the GGPPA described in Exhibit B, Tab 1, Schedule 1 of this Application into the rates for its Southern operations effective in advance of connecting its first customer in June 2020.
2. The GGPPA requires ENGLP to remit the Fuel Charge for both volumes delivered to customers and for company-use volumes. These costs will be recovered from customers through the flow through of the Fuel Charge as the Federal Carbon Charge and the inclusion of a Facility Carbon Charge¹ in distribution rates as outlined below.
3. To incorporate the impacts of the GGPPA into rates and as outlined in this Application, effective in advance of connecting its first customer in June 2020, ENGLP requests approval to establish the Federal Carbon Charge and the Facility Carbon Charge for Rates 1, 6, 11, and 16. As outlined in Exhibit C, ENGLP proposes to record actual associated administrative costs incurred in a deferral account and will seek recovery of its actual administration costs related to the GGPPA for 2020 in a future proceeding.
4. There are no amounts pertaining to 2019 recorded in any of the GHG deferral and variance accounts, and therefore ENGLP is not seeking recovery of balances with respect to 2019 costs.
5. ENGLP's proposals for the Federal Carbon Charge, Facility Carbon Charge and Administration costs are detailed in the Sections below. The requested rate schedule changes and customer bill impacts are provided in Sections 1.3 and 1.4 respectively.

1.0 Federal Carbon Charge

6. ENGLP proposes to recover the Fuel Charge for 2020 through the implementation of a Federal Carbon Charge of 5.8700 cents/m³ for customers in Rates 1, 6, and 11. The 5.8700 cents/m³ is as established by Environment and Climate Change Canada under Schedule 2 of the GGPPA as described at Exhibit A.

¹ As set out elsewhere in evidence, this charge is zero for 2020, and will appear as 0.0000 cents/m³ on the Tariff of Rates and Charges.



7. As noted in Exhibit B, Tab 1, Schedule 1, ENGLP has received or expects to receive Exemption Certificates for its two Rate 16 customers (7Acres and Greenfield Ethanol), as an OBPS qualified customer, and these volumes have been excluded from the calculation of the Federal Carbon Charge. OBPS-qualified customers with emissions exceeding 10 ktCO₂ e (assuming the registration of all voluntary participants), and customers that undertake a covered activity (e.g. facilities that use natural gas as a process feedstock) will not be charged the Federal Carbon Charge.

8. ENGLP is not aware of other customers who have filed exemptions, e.g. eligible commercial greenhouse customers. Eligible commercial greenhouse customers would be charged 20% of the Federal Carbon Charge, resulting in 80% greenhouse relief.

9. ENGLP proposes that the Federal Carbon Charge appear as a separate line item on customers' bills, consistent with the treatment of its Aylmer operations.

10. ENGLP will track the difference between the Federal Carbon Charge amount collected through rates and the actual Fuel Charge remitted to the CRA for customer related volumes in the FCCCVA as described in Exhibit D, Tab 1, Schedule 1.

11. The Federal Carbon Charge customer-related forecast volumes and costs by rate class for April 1, 2020 to December 31, 2020 period is provided at Exhibit E, Tab 2, Schedule 1.

1.1 Facility Carbon Charge

12. As further explained in Exhibit B, ENGLP Southern Bruce's costs of compliance with the GGPPA specific to the operation of the distribution system are zero. Facility Carbon Charge costs for 2020 are forecast to be zero. If there are actual costs incurred in this regard, ENGLP Southern Bruce will remit these amounts to the Canada Revenue Agency and update forecasts for future years as appropriate.

13. To avoid confusion, ENGLP proposes to not indicate on its Tariff of Rates and Charges, a Facility Carbon Charge of 0.0000 cents per m³. In the normal course, the proposed Facility Carbon Charge would be added to the current approved delivery charge for each rate class.



14. The Facility Carbon Charge forecast volumes and costs for 2020 and the determination of the proposed volumetric rate for Rates 1, 6, 11, and 16 are provided at Exhibit E, Tab 2, Schedule 2.

1.2 Administration Costs

15. The administration costs incurred in 2020 will be recorded in the existing GGEADA, and will be disposed of as part of a future proceeding, as described in Exhibit C, Tab 1, Schedule 1. Administration Costs, incremental to the Aylmer evidence, if any, will be provided in an evidence update.

1.3 Rate Schedule Changes

16. ENGLP will separately identify the Federal Carbon Charge as a new line item on customers' bills for all customer rate classes (Rates 1, 6, 11, and 16). The Facility Carbon Charge (forecast as zero in this application) will be embedded in the delivery or transportation charges on customer bills for all rate classes.

17. A summary of the Federal Carbon Charge unit rates by rate class for the April 1, 2020 to December 31, 2020 period is provided at Exhibit E, Tab 2, Schedule 3.

18. ENGLP has updated its rate schedules for its Southern Bruce operations to incorporate the impacts of the Application within each rate schedule including the changes to the Federal Carbon Charge, and the changes to the Facility Carbon Charge in the current approved delivery or volumetric rate as applicable.

19. Draft Rate Schedules incorporating these changes are included in Exhibit E, Tab 3, Schedule 1.

1.4 Customer Bill Impacts

20. The bill impact for an existing residential customer with annual consumption of 2,149 m³ is an increase of \$42.12 per year, and for a new residential customer with annual consumption of 2,066 m³ is an increase of \$40.49 per year.² Exhibit E, Tab 2, Schedule 4 provides a summary of

² For ease of comparison, the year period examined starts April 1, 2020 and ends on March 31, 2021.



the customer bill impacts for each rate class. Detailed bill impacts for a typical customer in each rate class are provided in Exhibit E, Tab 2, Schedule 5.



FEDERAL CARBON CHARGE UNIT RATE DETAILS

Table 2 - April 1, 2020 - December 31, 2020

Line No.	Customer Rate	Col 1 Net Volume	Col. 2 Federal Carbon Charge	Col. 3 Federal Carbon Cost	Col. 4 Recovery Net Volumes	Col. 5 Federal Carbon Chg Unit Rate
			$\$/m^3$	$\$$	m^3	cents/m^3
1	Rate 1	1,456,357	0.0587	85,488	1,456,357	
2	Rate 6	323,480	0.0587	18,988	323,480	
3	Rate 11	84,583	0.0587	4,965	84,583	
4	Rate 16 (1)	23,411,347				
5				109,441	1,864,420	5.8700
6	Exempt Volumes (2)	-		-	-	
7	Federal Carbon Cost			109,441		

(1) Both customers expected to hold exemption certificates.

(2) Assumes no other OBPS Participants for the purposes of the 2020 filing.



FACILITY CARBON CHARGE CALCULATIONS

Facility Related Volume Forecast – April 1, 2020 to December 31, 2020

Line No.		Net Volume	Federal Carbon Charge \$/m ³	Federal Carbon Cost ³ \$	
	Company Use				
1	Unaccounted For Gas (1)	0	0.0587	0	
2	Buildings (2)	0	0.0587	0	
3	NGV Fleet (3)	0	0.0587	0	
4	Unit Rate, all customer classes			0.0000	cents/m3

(1) Assumes 0% UFG

(2) All buildings are leased

(3) No fleet vehicles



**SUMMARY OF FEDERAL CARBON CHARGE AND FACILITY CARBON CHARGE UNIT
RATES BY RATE CLASS**

ENGLP SOUTHERN BRUCE

2020 Carbon Charge Unit Rate by Rate Class (April 1, 2020 to December 31, 2020)

Rate Class	Charge	Unit	Rate
Rate 1	Federal Carbon Charge (if applicable)	cents / m ³	5.8700
	Facility Carbon Charge	cents / m ³	0.0000
Rate 6	Federal Carbon Charge (if applicable)	cents / m ³	5.8700
	Facility Carbon Charge	cents / m ³	0.0000
Rate 11	Federal Carbon Charge (if applicable)	cents / m ³	5.8700
	Facility Carbon Charge	cents / m ³	0.0000
Rate 16	Facility Carbon Charge	cents / m ³	0.0000



SUMMARY OF CUSTOMER BILL IMPACTS

Rate Class	Annual Bill Current Rates	Annual Bill Proposed Rates	Change (\$)	Change (%)
Rate 1 Existing Residential	1,350.97	1,393.09	42.12	3.1%
Rate 1 New Residential	1,311.18	1,351.67	40.49	3.1%
Rate 1 Small Commercial	2,575.05	2,667.56	92.51	3.6%
Rate 6 Medium Commercial	14,286.770	14,814.66	527.89	3.7%
Rate 6 Large Commercial	37,216.10	38,699.52	1,483.43	4.0%
Rate 11 Large Volume Seasonal Service Sample Dryer 1	36,408.22	38,397.61	1,989.39	5.5%
Rate 11 Large Volume Seasonal Service Sample Dryer 2	115,535.07	122,166.37	6,631.30	5.7%
Rate 16 Contracted Firm Service (If Applicable)	860,093.45	871,853.45	11,760.00	1.4%
Rate Contracted Firm Service (Holding Valid Exemption Certificate)	860,093.45	860,093.45	0.00	0.0%



Rate 1 - Existing Residential		Units	Current Rate	Proposed Rate
Customer	\$/month		25.38	25.38
Bill 32 Rate	\$/month		1.00	1.00
First 100 m3	¢/m3		27.1967	27.1967
Next 400 m3	¢/m3		26.6610	26.6610
GT 500m3	¢/m3		25.8735	25.8735
Contracted Demand	¢ / contracted m3		-	-
Gas Supply	¢/m3		11.5114	11.5114
Upstream Recovery Charge	\$/m3		1.4740	1.4740
Transportation & Storage Charge	¢/m3		2.6982	2.6982
Federal Carbon Charge	¢/m3		3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	1.6330	1.6330
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Delivery

Customer	12	304.50	304.50	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 100 m3	1,001	272.33	272.33	0.00	0.00%
Next 400 m3	1,148	305.98	305.98	0.00	0.00%
GT 500m3	-	0.00	0.00	0.00	#DIV/0!
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	2,149.00	247.38	247.38	0.00	0.00%
Upstream Recovery Charge	2,149.00	31.68	31.68	0.00	0.00%
Transportation & Storage Charge	2,149.00	57.98	57.98	0.00	0.00%
Federal Carbon Charge	2,149.00	84.03	126.15	42.12	50.13%
Total Delivery		1,315.88	1,358.00	42.12	3.20%

Rate Riders

Delay in Revenue Recovery Rate Rider	2,149.00	35.09	35.09	0.00	0.00%
Total Rate Riders		35.09	35.09	-	0.00%

Total Bill Impact

	1,350.97	1,393.09	42.12	3.1%
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Rate 1 - New Residential	Units	Current Rate	Proposed Rate
Customer	\$/month	25.38	25.38
Bill 32 Rate	\$/month	1.00	1.00
First 100 m3	¢/m3	27.1967	27.1967
Next 400 m3	¢/m3	26.6610	26.6610
GT 500m3	¢/m3	25.8735	25.8735
Contracted Demand	¢ / contracted m3	0.0000	0.0000
Gas Supply	¢/m3	11.5114	11.5114
Upstream Recovery Charge	¢/m3	1.4740	1.4740
Transportation & Storage Charge	¢/m3	2.6982	2.6982
Federal Carbon Charge	¢/m3	3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	1.6330	1.6330
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	304.50	304.50	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 100 m3	993	270.10	270.10	0.00	0.00%
Next 400 m3	1,073	286.04	286.04	0.00	0.00%
GT 500m3	-	0.00	0.00	0.00	#DIV/0!
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	2,066.00	237.83	237.83	0.00	0.00%
Upstream Recovery Charge	2,066.00	30.45	30.45	0.00	0.00%
Transportation & Storage Charge	2,066.00	55.74	55.74	0.00	0.00%
Federal Carbon Charge	2,066.00	80.78	121.27	40.49	50.13%
Total Delivery		<u>1,277.44</u>	<u>1,317.93</u>	<u>40.49</u>	<u>3.17%</u>

Rate Riders

Delay in Revenue Recovery Rate Rider	2,066.00	<u>33.74</u>	<u>33.74</u>	<u>0.00</u>	<u>0.00%</u>
Total Rate Riders		<u>33.74</u>	<u>33.74</u>	<u>-</u>	<u>0.00%</u>

Total Bill Impact

	<u>1,311.18</u>	<u>1,351.67</u>	<u>40.49</u>	<u>3.1%</u>
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Rate 1 - Small Commercial	Units	Current Rate	Proposed Rate
Customer	\$/month	25.38	25.38
Bill 32 Rate	\$/month	1.00	1.00
First 100 m3	¢/m3	27.1967	27.1967
Next 400 m3	¢/m3	26.6610	26.6610
GT 500m3	¢/m3	25.8735	25.8735
Contracted Demand	¢ / contracted m3	0.0000	0.0000
Gas Supply	¢/m3	11.5114	11.5114
Upstream Recovery Charge	¢/m3	1.4740	1.4740
Transportation & Storage Charge	¢/m3	2.6982	2.6982
Federal Carbon Charge	¢/m3	3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	1.6330	1.6330
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	304.50	304.50	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 100 m3	1,198	325.86	325.86	0.00	0.00%
Next 400 m3	2,475	659.86	659.86	0.00	0.00%
GT 500m3	1,020	263.86	263.86	0.00	0.00%
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	4,693.00	540.23	540.23	0.00	0.00%
Upstream Recovery Charge	4,693.00	69.17	69.17	0.00	0.00%
Transportation & Storage Charge	4,693.00	126.63	126.63	0.00	0.00%
Federal Carbon Charge	4,693.00	183.50	275.48	91.98	50.13%
Total Delivery		2,485.62	2,577.60	91.98	3.70%

Rate Riders

Delay in Revenue Recovery Rate Rider	4,693.00	76.64	76.64	0.00	0.00%
Total Rate Riders		76.64	76.64	-	0.00%

Total Bill Impact

	2,562.25	2,654.24	91.98	3.6%
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Rate 1 - Small Agricultural	Units	Current Rate	Proposed Rate
Customer	\$/month	25.38	25.38
Bill 32 Rate	\$/month	1.00	1.00
First 100 m3	¢/m3	27.1967	27.1967
Next 400 m3	¢/m3	26.6610	26.6610
GT 500m3	¢/m3	25.8735	25.8735
Contracted Demand	¢ / contracted m3	0.0000	0.0000
Gas Supply	¢/m3	11.5114	11.5114
Upstream Recovery Charge	¢/m3	1.4740	1.4740
Transportation & Storage Charge	¢/m3	2.6982	2.6982
Federal Carbon Charge	¢/m3	3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	1.6330	1.6330
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	304.50	304.50	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 100 m3	1,199	326.02	326.02	0.00	0.00%
Next 400 m3	2,484	662.28	662.28	0.00	0.00%
GT 500m3	1,037	268.36	268.36	0.00	0.00%
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Commodity	4,720.00	543.34	543.34	0.00	0.00%
Upstream Recovery Charge	4,720.00	69.57	69.57	0.00	0.00%
Transportation & Storage Charge	4,720.00	127.36	127.36	0.00	0.00%
Federal Carbon Charge	4,720.00	184.55	277.06	92.51	50.13%
Total Delivery		<u>2,497.97</u>	<u>2,590.48</u>	<u>92.51</u>	<u>3.70%</u>

Rate Riders

Delay in Revenue Recovery Rate Rider	4,720.00	<u>77.08</u>	<u>77.08</u>	<u>0.00</u>	<u>0.00%</u>
Total Rate Riders		<u>77.08</u>	<u>77.08</u>	<u>-</u>	<u>0.00%</u>

Total Bill Impact

	<u>2,575.05</u>	<u>2,667.56</u>	<u>92.51</u>	<u>3.6%</u>
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Rate 6 - Medium Commercial		Units	Current Rate	Proposed Rate
Customer	\$/month		103.53	103.53
Bill 32 Rate	\$/month		1.00	1.00
First 1000 m3	¢/m3		25.0897	25.0897
Next 6000 m3	¢/m3		22.5807	22.5807
GT 7000m3	¢/m3		21.4516	21.4516
Contracted Demand	¢ / contracted m3		-	-
Gas Supply	¢/m3		11.5114	11.5114
Upstream Recovery Charge	¢/m3		2.9200	2.9200
Transportation & Storage Charge	¢/m3		5.6413	5.6413
Federal Carbon Charge	¢/m3		3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	0.9090	0.9090
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	1,242.36	1,242.36	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 1000 m3	9,832	2,466.70	2,466.70	0.00	0.00%
Next 6000 m3	17,101	3,861.63	3,861.63	0.00	0.00%
GT 7000m3	-	0.00	0.00	0.00	#DIV/0!
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	26,933.00	3,100.37	3,100.37	0.00	0.00%
Upstream Recovery Charge	26,933.00	786.44	786.44	0.00	0.00%
Transportation & Storage Charge	26,933.00	1,519.37	1,519.37	0.00	0.00%
Federal Carbon Charge	26,933.00	1,053.08	1,580.97	527.89	50.13%
Total Delivery		14,041.95	14,569.84	527.89	3.76%

Rate Riders

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Delay in Revenue Recovery Rate Rider	26,933.00	244.82	244.82	0.00	0.00%
Total Rate Riders		244.82	244.82	-	0.00%

Total Bill Impact

	14,286.77	14,814.66	527.89	3.69%
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Rate 6 - Large Commercial	Units	Current Rate	Proposed Rate
Customer	\$/month	103.53	103.53
Bill 32 Rate	\$/month	1.00	1.00
First 1000 m3	¢/m3	25.0897	25.0897
Next 6000 m3	¢/m3	22.5807	22.5807
GT 7000m3	¢/m3	21.4516	21.4516
Contracted Demand	¢ / contracted m3	0.0000	0.0000
Gas Supply	¢/m3	11.5114	11.5114
Upstream Recovery Charge	¢/m3	2.9200	2.9200
Transportation & Storage Charge	¢/m3	5.6413	5.6413
Federal Carbon Charge	¢/m3	3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	0.9090	0.9090
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	1,242.36	1,242.36	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
First 1000 m3	11,715	2,939.34	2,939.34	0.00	0.00%
Next 6000 m3	40,793	9,211.28	9,211.28	0.00	0.00%
GT 7000m3	23,177	4,971.83	4,971.83	0.00	0.00%
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	75,685.00	8,712.40	8,712.40	0.00	0.00%
Upstream Recovery Charge	75,685.00	2,210.00	2,210.00	0.00	0.00%
Transportation & Storage Charge	75,685.00	4,269.62	4,269.62	0.00	0.00%
Federal Carbon Charge	75,685.00	2,959.28	4,442.71	1,483.43	50.13%
Total Delivery		36,528.12	38,011.55	1,483.43	4.06%

Rate Riders

Delay in Revenue Recovery Rate Rider	75,685.00	687.98	687.98	0.00	0.00%
Total Rate Riders		687.98	687.98	-	0.00%

Total Bill Impact

	37,216.10	38,699.52	1,483.43	3.99%
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Filed: 2020-05-01
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Exhibit E-S
Tab 2
Schedule 5
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Rate 11 - Large Seasonal Service Sample Dryer 1		Units	Current Rate	Proposed Rate
Customer	\$/month		207.06	207.06
Bill 32 Rate	\$/month		1.00	1.00
All Volumes	¢/m3		15.5849	15.5849
Tier 2	¢/m3		15.5849	15.5849
Tier 3	¢/m3		15.5849	15.5849
Contracted Demand	¢ / contracted m3		-	-
Gas Supply	¢/m3		11.5114	11.5114
Upstream Recovery Charge	¢/m3		0.0352	0.0352
Transportation & Storage Charge	¢/m3		1.8166	1.8166
Federal Carbon Charge	¢/m3		3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	0.5524	0.5524
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	2,484.72	2,484.72	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
All Volumes	101,499	15,818.61	15,818.61	0.00	0.00%
Tier 2	-	0.00	0.00	0.00	#DIV/0!
Tier 3	-	0.00	0.00	0.00	#DIV/0!
Contracted Demand	-	0.00	0.00	0.00	#DIV/0!
Gas Supply	101,499.49	11,684.01	11,684.01	0.00	0.00%
Upstream Recovery Charge	101,499.49	35.73	35.73	0.00	0.00%
Transportation & Storage Charge	101,499.49	1,843.84	1,843.84	0.00	0.00%
Federal Carbon Charge	101,499.49	3,968.63	5,958.02	1,989.39	50.13%
Total Delivery		35,847.54	37,836.93	1,989.39	5.55%

Rate Riders

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Delay in Revenue Recovery Rate Rider	101,499.49	560.68	560.68	0.00	0.00%
Total Rate Riders		560.68	560.68	-	0.00%

Total Bill Impact		36,408.22	38,397.61	1,989.39	5.46%
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Rate 11 - Large Seasonal Service Sample Dryer 2		Units	Current Rate	Proposed Rate
Customer		\$/month	207.06	207.06
Bill 32 Rate		\$/month	1.00	1.00
All Volumes		¢/m3	15.5849	15.5849
Tier 2		¢/m3	15.5849	15.5849
Tier 3		¢/m3	15.5849	15.5849
Contracted Demand		¢ / contracted m3	0.0000	0.0000
Gas Supply		¢/m3	11.5114	11.5114
Upstream Recovery Charge		¢/m3	0.0352	0.0352
Transportation & Storage Charge		¢/m3	1.8166	1.8166
Federal Carbon Charge		¢/m3	3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢/m3	0.5524	0.5524
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	2,484.72	2,484.72	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
All Volumes	338,332	52,728.71	52,728.71	0.00	0.00%
Tier 2	-	0.00	0.00	0.00	#DIV/O!
Tier 3	-	0.00	0.00	0.00	#DIV/O!
Contracted Demand	-	0.00	0.00	0.00	#DIV/O!
Gas Supply	338,331.62	38,946.71	38,946.71	0.00	0.00%
Upstream Recovery Charge	338,331.62	119.09	119.09	0.00	0.00%
Transportation & Storage Charge	338,331.62	6,146.13	6,146.13	0.00	0.00%
Federal Carbon Charge	338,331.62	13,228.77	19,860.07	6,631.30	50.13%
Total Delivery		113,666.13	120,297.43	6,631.30	5.83%

Rate Riders

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Delay in Revenue Recovery Rate Rider	338,331.62	1,868.94	1,868.94	0.00	0.00%
Total Rate Riders		1,868.94	1,868.94	-	0.00%

Total Bill Impact

	115,535.07	122,166.37	6,631.30	5.74%
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Rate 16 - Contracted Demand		Units	Current Rate	Proposed Rate
Customer	\$/month		1,522.50	1,522.50
Bill 32 Rate	\$/month		1.00	1.00
Tier 1	¢/m3		0.0000	0.0000
Tier 2	¢/m3		0.0000	0.0000
Tier 3	¢/m3		0.0000	0.0000
Contracted Demand	¢ / contracted m3		103.8486	103.8486
Gas Supply	¢/m3		0.0000	0.0000
Upstream Recovery Charge	¢ / contracted m3		14.2434	14.2434
Transportation Charge From Dawn	¢ / contracted m3		18.2999	18.2999
Transportation Charge From Kirkwall	¢ / contracted m3		11.8480	11.8480
Transportation Charge From Parkway	¢ / contracted m3		11.8480	11.8480
Federal Carbon Charge	¢/m3		3.9100	5.8700

Rate Riders

Delay in Revenue Recovery Rate Rider	¢ / contracted m3	0.0601	0.0601
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Delivery

	Metric	Current Rate	Proposed Rate	Change \$	Change %
Customer	12	18,270.00	18,270.00	0.00	0.00%
Bill 32 Rate	12	12.00	12.00	0.00	0.00%
Tier 1	-	0.00	0.00	0.00	#DIV/0!
Tier 2	-	0.00	0.00	0.00	#DIV/0!
Tier 3	-	0.00	0.00	0.00	#DIV/0!
Contracted Demand	50,000	623,091.65	623,091.65	0.00	0.00%
Gas Supply	0.00	0.00	0.00	0.00	#DIV/0!
Upstream Recovery Charge	50,000.00	85,460.40	85,460.40	0.00	0.00%
Transportation Charge From Dawn	50,000.00	109,799.40	109,799.40	0.00	0.00%
Transportation Charge From Kirkwall	0.00	0.00	0.00	0.00	#DIV/0!
Transportation Charge From Parkway	0.00	0.00	0.00	0.00	#DIV/0!
Federal Carbon Charge	50,000.00	23,460.00	35,220.00	11,760.00	50.13%
Total Delivery		860,093.45	871,853.45	11,760.00	1.37%



Rate 16 - Contracted Demand		Units	Current Rate	Proposed Rate		
Rate Riders		Metric	Current Rate	Proposed Rate	Change \$	Change %
Delay in Revenue Recovery Rate Rider		12.00	360.60	360.60	0.00	0.00%
Total Rate Riders			360.60	360.60	-	0.00%
Total Bill Impact			860,454.05	872,214.05	11,760.00	1.37%

Note(1): Bill Impact is \$0 if the Rate 16 Customer holds a valid exemption certificate, and Federal Carbon Charge does not apply.

EPCOR Natural Gas Limited Partnership
(Southern Bruce Operations)

Proposed Draft Rate Schedules

EB-2020-0076

Effective: June 1, 2020

EPCOR NATURAL GAS LIMITED PARTNERSHIP

RATE 1 - General Firm Service

Applicability

Any customer in EPCOR's Southern Bruce Natural Gas System who is an end user and whose total gas requirements are equal to or less than 10,000 m³ per year.

Rate

Rates per m³ assume an energy content of 38.89MJ/m³.

Bills will be rendered monthly and shall be the total of:

Monthly Fixed Charge⁽¹⁾	\$26.38
Delivery Charge	
First 100 m ³ per month	27.1967 ¢ per m ³
Next 400 m ³ per month	26.6610 ¢ per m ³
Over 500 m ³ per month	25.8735 ¢ per m ³
Upstream Charges	
Upstream Recovery charge	1.4740 ¢ per m ³
Transportation and Storage charge	2.6982 ¢ per m ³
Rate Rider for Delay in Revenue Recovery	1.6330 ¢ per m ³
- effective for 10 years ending December 31, 2028	
Federal Carbon Charge (if applicable)	5.8700 ¢ per m ³
Gas Supply Charge	11.5114 ¢ per m ³

⁽¹⁾Aggregated within Monthly Fixed Charge is the amount of one dollar per month in accordance with Bill 32 and Ontario Regulation 24/19.

Direct Purchase Delivery

Where a customer elects under this Rate Schedule to directly purchase its gas from a supplier other than EPCOR, the supplier must qualify as a "gas marketer" under the *Ontario Energy Board Act, 1998*, and must enter into a T-Service Receipt Contract with EPCOR for delivery of gas to EPCOR at a receipt point listed on the upstream transportation contract that EPCOR has with the Upstream Service Provider ("**Ontario Delivery Point**"). T-Service Receipt Contract rates are described in Rate Schedule T1. Transportation and Storage charges may vary depending on the Ontario Delivery Point. Gas Supply Charges in this Rate Schedule are not applicable for Rate T1 customers.

Terms and Conditions of Service

The provisions in the "EPCOR Natural Gas Limited Partnership Southern Bruce Natural Gas Operations Conditions of Service" apply, as contemplated therein, to service under this Rate Schedule.

Effective: June 1, 2020
Implementation: All bills rendered on or after June 1, 2020
Replacing Rate Effective: January 1, 2019
EB-2020-0076 (SOUTHERN BRUCE OPERATIONS)

RATE 6 – Large Volume General Firm Service

Applicability

Any customer in EPCOR's Southern Bruce Natural Gas System who is an end user and whose total gas requirements are greater than 10,000 m³ per year.

Rate

Rates per m³ assume an energy content of 38.89MJ/m³.

Bills will be rendered monthly and shall be the total of:

Monthly Fixed Charge⁽¹⁾	\$104.53
Delivery Charge	
First 1,000 m ³ per month	25.0897 ¢ per m ³
Next 6,000 m ³ per month	22.5807 ¢ per m ³
Over 7,000 m ³ per month	21.4516 ¢ per m ³
Upstream Charges	
Upstream Recovery charge	2.9200 ¢ per m ³
Transportation and Storage charge	5.6413 ¢ per m ³
Rate Rider for Delay in Revenue Recovery	0.9090 ¢ per m ³
- effective for 10 years ending December 31, 2028	
Federal Carbon Charge (if applicable)	5.8700 ¢ per m ³
Gas Supply Charge	11.5114 ¢ per m ³

⁽¹⁾Aggregated within Monthly Fixed Charge is the amount of one dollar per month in accordance with Bill 32 and Ontario Regulation 24/19.

Direct Purchase Delivery

Where a customer elects under this Rate Schedule to directly purchase its gas from a supplier other than EPCOR, the customer or their agent must enter into a T-Service Receipt Contract with EPCOR for delivery of gas to EPCOR at a receipt point listed on the upstream transportation contract that EPCOR has with the Upstream Service Provider ("**Ontario Delivery Point**"). T-Service Receipt Contract rates are described in Rate Schedule T1. Transportation and Storage charges may vary depending on the Ontario Delivery Point. Gas Supply Charges in this Rate Schedule are not applicable for Rate T1 customers.

Terms and Conditions of Service

The provisions in the "EPCOR Natural Gas Limited Partnership Southern Bruce Natural Gas Operations Conditions of Service" apply, as contemplated therein, to service under this Rate Schedule.

Effective: June 1, 2020

Implementation: All bills rendered on or after June 1, 2020

EB-2020-0076 (SOUTHERN BRUCE OPERATIONS)

EPCOR NATURAL GAS LIMITED PARTNERSHIP

RATE 11 - Large Volume Seasonal Service

Applicability

Any customer in EPCOR's Southern Bruce Natural Gas System who is an end user and whose gas requirements are only during the period of May 1 through December 15 inclusive and are greater than 10,000 m³.

Rate

Rates per m³ assume an energy content of 38.89MJ/m³.

Bills will be rendered monthly and shall be the total of:

	May 1 through December 15	
Monthly Fixed Charge⁽¹⁾	\$208.06	
Delivery Charge		
All volumes delivered	15.5849	¢ per m ³
Upstream Charges		
Upstream Recovery charge	0.0352	¢ per m ³
Transportation and Storage charge	1.8166	¢ per m ³
Rate Rider for Delay in Revenue Recovery	0.5524	¢ per m ³
- effective for 10 years ending December 31, 2028		
Federal Carbon Charge (if applicable)	5.8700	¢ per m ³
Gas Supply Charge	11.5114	¢ per m ³

⁽¹⁾Aggregated within Monthly Fixed Charge is the amount of one dollar per month in accordance with Bill 32 and Ontario Regulation 24/19.

Unaccounted for Gas (UFG):

Forecasted UFG is applied to all volumes of gas delivered to the customer.

Forecasted Unaccounted for Gas Percentage	0.00	%
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Overrun Charges:

Any volume of gas taken during the period of December 16 through April 30 inclusive shall constitute "Overrun Gas" and must be authorized in advance by EPCOR. Delivery of these volumes is available at the Authorized Overrun Charge in addition to applicable Upstream Charges and Gas Supply Charges. EPCOR will not unreasonably withhold authorization.

Authorized Overrun Charge	16.0000	¢ per m ³
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Any volume of gas taken during the period of December 16 through April 30 inclusive without EPCOR's approval in advance shall constitute "Unauthorized Overrun Gas". Delivery of these volumes will be paid for at the Unauthorized Overrun Charge in addition to applicable Upstream Charges and Gas Supply Charges.

Unauthorized Overrun Charge

388.9000 ¢ per m³

For any volume of Unauthorized Overrun Gas taken, the customer shall, in addition, indemnify EPCOR in respect of any penalties or additional costs imposed on EPCOR by its suppliers, any additional gas cost incurred or any sales margins lost as a consequence of the customer taking the unauthorized overrun volume.

Nominations:

Union Gas Limited will be the “Upstream Service Provider” to facilitate delivery and balancing of gas supplies to the EPCOR Southern Bruce Natural Gas System. For service under this Rate Schedule, the customer shall nominate for transportation of gas volumes for ultimate delivery to the customer. The customer agrees to nominate its daily gas volumetric requirement to EPCOR, or its designated agent, consistent with industry nomination standards including those nomination requirements of the Upstream Service Provider.

The customer shall nominate gas delivery daily based on its daily gas requirements plus the Forecasted UFG rate as set out in this Rate Schedule.

The nomination calculation shall equal:

*[(Daily volume of gas to be delivered) * (1 + Forecasted UFG)]*

Customers may change daily nominations based on the nomination windows within a day as defined by EPCOR’s agreement with the Upstream Service Provider.

In the event nominations under this Rate Schedule do not match upstream nominations, the nomination will be confirmed at the upstream value.

Customers with multiple connections under this Rate Schedule may combine nominations at the sole discretion of EPCOR. For combined nominations the customer shall specify the quantity of gas to each meter installation (“Terminal Location”) and the order in which the gas is to be delivered to each Terminal Location.

Load Balancing:

Daily nominations provided by the customer shall be used for the purposes of day-to-day balancing as required under EPCOR’s arrangement with the Upstream Service Provider.

When a customer’s metered consumption on any day is different than the gas nominated for consumption by the customer on any day, this constitutes a “Daily Load Imbalance”. A “Cumulative Load Imbalance” occurs when the ongoing absolute value of Daily Load Imbalances are greater than zero.

To the extent that EPCOR incurs daily or cumulative load balancing charges, the customer will be responsible for its proportionate share of such charges. Charges related to these imbalances are as defined in EPCOR’s agreement with the Upstream Service Provider.

Direct Purchase Delivery

Where a customer elects under this Rate Schedule to directly purchase its gas from a supplier other than EPCOR, the customer or their agent must enter into a T-Service Receipt Contract with EPCOR for delivery of gas to EPCOR at a receipt point listed on the upstream transportation contract that EPCOR has with the Upstream Service Provider (“Ontario Delivery Point”). T-Service Receipt Contract rates are described in Rate Schedule T1. Transportation and Storage charges may vary depending on the Ontario Delivery Point. Gas Supply Charges in this Rate Schedule are not applicable for Rate T1 customers.

Terms and Conditions of Service

1. In any year, during the period of May 1 through December 15 inclusive, the customers shall receive continuous (“Firm”) service from EPCOR, except where impacted by events as specified in EPCOR Natural Gas Limited

Partnership Southern Bruce Natural Gas Operations Conditions of Service including force majeure. During the period of December 16 through April 30 inclusive, any authorized overrun service shall be interruptible at the sole discretion of EPCOR. All service during the period December 16 through April 30 inclusive shall be subject to EPCOR's prior authorization under the daily nomination procedures outlined in this Rate Schedule and shall constitute Overrun Gas.

2. To the extent that EPCOR's Upstream Service Provider provides any seasonal or day-to-day balancing rights for EPCOR, the customer shall be entitled to a reasonable proportion of such balancing rights as determined by EPCOR from time to time. If the customer utilizes any of EPCOR's seasonal or day-to-day balancing services or any other services available from the Upstream Service Provider, the customer agrees to comply with all balancing requirements imposed by the Upstream Service Provider. The customer also agrees to be liable for its share of any such usage limitations or restrictions, fees, costs or penalties associated with the usage of such services, including but not limited to any associated storage fees, daily or cumulative balancing fees or penalties, and gas commodity costs as determined by EPCOR, acting reasonably.
3. EPCOR receives upstream services under the Union Gas Limited M17 Rate Schedule. Details of this upstream arrangement and associated nomination standards and Load Balancing Arrangement are available at www.uniongas.com.
4. The provisions in the "EPCOR Natural Gas Limited Partnership Southern Bruce Natural Gas Operations Conditions of Service" apply, as contemplated therein, to service under this Rate Schedule.

Effective: June 1, 2020

Implementation: All bills rendered on or after June 1, 2020

Replacing Rate Effective: January 1, 2019

EB-2020-0076 (SOUTHERN BRUCE OPERATIONS)

EPCOR NATURAL GAS LIMITED PARTNERSHIP

RATE 16 – Contracted Firm Service

Applicability

Any customer connected directly to EPCOR's Southern Bruce Natural Gas High Pressure Steel System and who enters into a contract with EPCOR for firm contract daily demand of at least 2,739m³.

Rate

Rates per m³ assume an energy content of 38.89MJ/m³.

Bills will be rendered monthly and shall be the total of:

Monthly Fixed Charge⁽¹⁾	\$1,523.50
Delivery Charge	
Per m ³ of Contract Demand	103.8486 ¢ per m ³
Upstream Charges	
Upstream Recovery charge per m ³ of Contract Demand	14.2434 ¢ per m ³
Transportation charge per m ³ of Contract Demand	
Transportation from Dawn	18.2999 ¢ per m ³
Transportation from Kirkwall	11.8480 ¢ per m ³
Transportation from Parkway	11.8480 ¢ per m ³
Rate Rider for Delay in Revenue Recovery	0.0601 ¢ per m ³
- effective for 10 years ending December 31, 2028	
Federal Carbon Charge (if applicable)	5.8700 ¢ per m ³

⁽¹⁾Aggregated within Monthly Fixed Charge is the amount of one dollar per month in accordance with Bill 32 and Ontario Regulation 24/19.

Unaccounted for Gas:

Forecasted Unaccounted for Gas (UFG) is applied to all volumes of gas delivered to the customer.

Forecasted Unaccounted for Gas Percentage	0.00 %
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Overrun Charges:

Any volume of gas taken in excess of the daily Contract Demand or Peak Hourly Volume EPCOR is obligated to transport as per the contract with the customer shall constitute "Overrun Gas" and must be authorized in advance by EPCOR. Delivery of these volumes is available at the Authorized Overrun Charge in addition to applicable Upstream Charges. EPCOR will not unreasonably withhold authorization.

Authorized Overrun Charge	5.0000 ¢ per m ³
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Any volume of gas taken in excess of the daily Contract Demand or Peak Hourly Volume EPCOR is obligated to transport as per the contract with the customer without EPCOR's approval in advance shall constitute "Unauthorized

Overrun Gas". Delivery of these volumes will be paid for at the Unauthorized Overrun Charge in addition to applicable Upstream Charges.

Unauthorized Overrun Charge

389.0000 ¢ per m³

For any volume of Unauthorized Overrun Gas taken, the customer shall, in addition, indemnify EPCOR in respect of any penalties or additional costs imposed on EPCOR by its suppliers, any additional gas cost incurred or any sales margins lost as a consequence of the customer taking the unauthorized overrun volume.

Nominations:

Union Gas Limited will be the "Upstream Service Provider" to facilitate delivery and balancing of gas supplies to the EPCOR Southern Bruce Natural Gas System. For service under this Rate Schedule, the customer shall nominate for transportation of gas volumes for ultimate delivery to the customer. The customer agrees to nominate its daily gas volumetric requirement to EPCOR, or its designated agent, consistent with industry nomination standards including those nomination requirements of the Upstream Service Provider.

The customer shall nominate gas delivery daily based on its daily gas requirements plus the Forecasted UFG rate and Fuel Ratio. The Forecasted UFG rate is as set out in this Rate Schedule. The Fuel Ratio is the Shipper Supplied Fuel rates applicable to the receipt point of gas defined in the "Gas Supply" section of this Rate Schedule.

The nomination calculation shall equal:

$$[(\text{Daily volume of gas to be delivered}) * (1 + \text{Forecasted UFG}) * (1 + \text{Fuel Ratio})]$$

Customers may change daily nominations based on the nomination windows within a day as defined by EPCOR's agreement with the Upstream Service Provider.

In the event nominations under this Rate Schedule do not match upstream nominations, the nomination will be confirmed at the upstream value.

Customers with multiple connections under this Rate Schedule may combine nominations at the sole discretion of EPCOR. For combined nominations the customer shall specify the quantity of gas to each meter installation ("Terminal Location") and the order in which the gas is to be delivered to each Terminal Location.

Load Balancing:

Daily nominations provided by the customer shall be used for the purposes of day-to-day balancing as required under EPCOR's arrangement with the Upstream Service Provider.

When a customer's metered consumption on any day is different than the gas nominated for consumption by the customer on any day, this constitutes a "Daily Load Imbalance". A "Cumulative Load Imbalance" occurs when the ongoing absolute value of Daily Load Imbalances are greater than zero.

To the extent that EPCOR incurs daily or cumulative load balancing charges, the customer will be responsible for its proportionate share of such charges. Charges related to these imbalances are as defined in EPCOR's agreement with the Upstream Service Provider.

Gas Supply:

Unless otherwise authorized by EPCOR, customers under this Rate Schedule must deliver firm gas at a receipt point listed on the upstream transportation contract that EPCOR has with the Upstream Service Provider ("**Ontario Delivery Point**"). The customer or their agent must enter into a T-Service Receipt Contract with EPCOR for delivery of gas to EPCOR. T-Service Receipt Contract rates are described in Rate Schedule T1.

The customer must deliver to EPCOR on a daily basis the volume of gas to be delivered to the customer's Terminal Location plus the Forecasted UFG rate and Fuel Ratio. Transportation charges vary depending on the Ontario Delivery Point at the rates provided in this Rate Schedule. The Forecasted UFG rate is as set out in this Rate Schedule, and the Fuel Ratio is the Shipper Supplied Fuel rates of the Ontario Delivery Point related to necessary compressor or other fuel requirements of the Upstream Service Provider.

The Gas Supply calculation shall equal:

*[(Daily volume of gas to be delivered) * (1 + Forecasted UFG) * (1 + Fuel Ratio)]*

Terms and Conditions of Service

1. EPCOR receives upstream services under the Union Gas Limited M17 Rate Schedule. Details of this upstream arrangement and associated nomination standards, applicable Fuel Ratio, and Load Balancing Arrangement are available at www.uniongas.com.
2. The provisions in the “EPCOR Natural Gas Limited Partnership General Terms and Conditions for Rate 16 Customers” apply, as contemplated therein, to service under this Rate Schedule.

Effective: June 1, 2020

Implementation: All bills rendered on or after June 1, 2020

Replacing Rate Effective: January 1, 2019

EB-2020-0076 (SOUTHERN BRUCE OPERATIONS)

EPCOR NATURAL GAS LIMITED PARTNERSHIP

RATE T1 – Direct Purchase Contract Rate

Availability

Rate T1 is available to all customers or their agent who enter into a T-Service Receipt Contract for delivery of gas to EPCOR. The availability of this option is subject to EPCOR obtaining a satisfactory agreement or arrangement with EPCOR's Upstream Service Provider for direct purchase volume.

Eligibility

All customers who must, or elect to, purchase gas directly from a supplier other than EPCOR. These customers must enter into a T-Service Receipt Contract with EPCOR either directly or through their agent, for delivery of gas to EPCOR at a receipt point listed on the upstream transportation contract that EPCOR has with the Upstream Service Provider ("**Ontario Delivery Point**").

Rate

All charges in the customer's appropriate Rate Schedule excluding Gas Supply Charge shall apply. Applicable Transportation and Storage charges are determined based on the Ontario Delivery Point.

In addition, administration fees apply to customers who elect to enter into a T-Service Receipt Contract with EPCOR and are detailed in the Direct Purchase Contract with the customer or its agent.

For gas delivered to EPCOR at any point other than the Ontario Delivery Point, EPCOR will charge the customer or their agent all approved tolls and charges incurred by EPCOR to transport the gas to the Ontario Delivery Point.

Unaccounted for Gas:

Forecasted Unaccounted for Gas (UFG) is applied to all volumes of gas supplied:

Forecasted Unaccounted for Gas Percentage	0.00 %
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Gas Supply:

Unless otherwise authorized by EPCOR, customers who are delivering gas to EPCOR under direct purchase arrangements must deliver firm gas at a daily volume acceptable to EPCOR, to an Ontario Delivery Point, and, where applicable, must acquire and maintain firm transportation on all pipeline systems upstream of Ontario.

The customer or its agent must deliver to EPCOR on a daily basis, at the Ontario Delivery Point, the volume of gas to be delivered to the customer's Terminal Location plus the Forecasted UFG rate and Fuel Ratio. Where the Forecasted UFG rate is as set out in this Rate Schedule, and the Fuel Ratio is the Shipper Supplied Fuel rates of the Ontario Delivery Point related to necessary compressor or other fuel requirements of the Upstream Service Provider.

The Gas Supply calculation shall equal:

*$[(\text{Daily volume of gas to be delivered}) * (1 + \text{Forecasted UFG}) * (1 + \text{Fuel Ratio})]$*

Terms and Conditions of Service

The provisions in the "T-Service Receipt Contract General Terms and Conditions" apply, as contemplated therein, to service under this Rate Schedule.

Effective: June 1, 2020

Implementation: All bills rendered on or after June 1, 2020

Replacing Rate Effective: January 1, 2019

EB-2020-0076 (SOUTHERN BRUCE OPERATIONS)

EPCOR NATURAL GAS LIMITED PARTNERSHIP

Schedule of Miscellaneous and Service Charges

A		B
Service		Fee
1	Service Work	
2	During normal working hours	
3	Minimum charge (up to 60 minutes)	\$100.00
4	Each additional hour (or part thereof)	\$100.00
5	Outside normal working hours	
6	Minimum charge (up to 60 minutes)	\$130.00
7	Each additional hour (or part thereof)	\$105.00
8		
9	Miscellaneous Charges	
10	Returned Cheque / Payment	\$20.00
11	Replies to a request for account information	\$25.00
12	Bill Reprint / Statement Print Requests	\$20.00
13	Consumption Summary Requests	\$20.00
14	Customer Transfer / Connection Charge	\$35.00 ³
15		
16	Reconnection Charge	\$85.00
17		
18	Inactive Account Charge	ENGLP's cost to install service
19		
20	Late Payment Charge	1.5% / month, 19.56% / year (effective rate of 0.04896% compounded daily)
21		
22	Meter Tested at Customer Request Found to be Accurate	Charge based on actual costs
23		
24	Installation of Service Lateral	No charge for the first 30 meters.

Note: Applicable taxes will be added to the above charges

³ No Charge for initial connection