

April 1, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Long:

EB-2021-0004 – Enbridge Gas Inc. – Consultation to Review the 2021 Annual Gas Supply Update

Please find, attached, questions for Enbridge Gas Inc. pursuant to the above-referenced consultation process from the Consumers Council of Canada and the Vulnerable Energy Consumers Coalition.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

REQUESTOR NAME	CCC/VECC
TO:	Enbridge Gas Inc. (EGI)
DATE:	March 31, 2021
CASE NO:	EB-2021-0004
APPLICATION NAME	2021 Gas Supply Plan

Reference : 2021 Annual Gas Supply Plan Update, February 1, 2021 (EGI 2021 Gas Plan)

1.0 Reference: EGI 2021 Gas Plan, page 9

EGI discusses a project it has initiated to harmonize gas supply methodologies of the two former utilities (Enbridge Gas Distribution and Union Gas Limited). Please explain if the following methodologies are being examined under this initiative:

- average use per customer;
- unaccounted for gas measurement.

2.0 Reference: EGI 2021 Gas Plan, page 9

How does EGI plan to engage stakeholders in the project to harmonize gas supply methodologies?

3.0 Reference: EGI 2021 Gas Plan, page 10

How does EGI intend to engage stakeholders to ensure that its IT system integration will accommodate the reporting needs of the OEB, customers and other stakeholders?

4.0 Reference: EGI 2021 Gas Plan, pages 21-22

Please amend Tables 1 (Annual Demand Forecast) and 2 (Design Day Demand Forecast) to include the historical years 2019/2020 and 2018/2019.

5.0 Reference: EGI 2021 Gas Plan, pages 25-

EGI states it is *“investigating SNG frameworks and exploring opportunities for the potential inclusion of SNG within its system supply portfolio as early as November 1, 2021.”* The premiums for this gas are estimated to be in the \$0.05/GJ to \$0.15/GJ range.

- a) Please explain how the premium range was estimated.
- b) Please explain the amount of gas being considered to be included in the gas supply post November 1, 2021 and the estimated total of the premium for this gas in the 2021/22 gas year.
- c) Please explain what customer outreach has been completed to understand the extent to which customers are willing to pay premiums for non mandatory programs like SNG.

6.0 Reference: EGI 2021 Gas Plan, page 33

Table 4 - Storage Requirement Forecast

Line No.	Particulars (PJ)	2020/21	2021/22	2022/23	2023/24	2024/25
<u>EGD</u>						
1	Infranchise Storage Requirement					
2	Infranchise Customer Requirement	125.8	125.8	125.8	125.8	125.8
3	Cost-Based Storage					
4	Tecumseh	99.0	99.0	99.0	99.0	99.0
5	Welland	0.3	0.3	0.3	0.3	0.3
6	Market Based Storage	26.5	26.5	26.5	26.5	26.5
7	Space Allocated for Infranchise Use	125.8	125.8	125.8	125.8	125.8
<u>Union</u>						
8	Infranchise Storage Requirement					
9	Contingency	9.5	9.5	9.5	9.5	9.5
10	Infranchise Customer Requirement	88.1	87.8	87.1	88.3	88.5
		97.6	97.3	96.7	97.8	98.0
11	Cost-Based Storage					
12	Dawn	100.0	100.0	100.0	100.0	100.0
13	Excess Utility Space Available	2.4	2.7	3.3	2.2	2.0

- a) For the Union rate zone please explain how the “Contingency” amount of infranchise regulated storage is determined and how use of this storage differs from that for “Infranchise Customer Requirement”
- b) Does the EGD rate zone also have a “Contingency” amount of storage. If not please explain the different treatment for contingency storage between the two rate zones.

7.0 Reference: EGI 2021 Gas Plan, Table 6, page 36

Table 6 - EGD Rate Zone Design Day Position

Line No.	Particulars (TJ/d)	EGD CDA					EGD EDA				
		2020/21	2021/22	2022/23	2023/24	2024/25	2020/21	2021/22	2022/23	2023/24	2024/25
Demand											
1	Gross Demand	3,400	3,412	3,425	3,437	3,448	719	724	729	734	738
2	Curtailment	(71)	(71)	(71)	(71)	(71)	(26)	(26)	(26)	(26)	(26)
3	Net Demand	3,329	3,341	3,354	3,366	3,377	693	698	703	708	713
Supply Asset											
4	TCPL Long-haul	5	5	5	5	5	260	260	260	260	260
5	TCPL Short-haul	668	773	768	768	768	337	358	362	362	362
6	TCPL STS	284	284	284	284	284	81	81	81	81	81
7	EGI D-P	2,194	2,194	2,194	2,194	2,194	-	-	-	-	-
8	In-Franchise Supply	72	72	72	72	72	0	0	0	0	0
9	Third-Party Services	40	-	-	-	-	-	-	-	-	-
10	Total Supply	3,263	3,328	3,323	3,323	3,323	678	698	703	703	703
11	Excess(Shortfall)	(66)	(14)	(31)	(42)	(54)	(16)	-	(1)	(5)	(10)
12	Shortfall % of Net Demand	2.0%	0.4%	0.9%	1.3%	1.6%	2.2%	0.0%	0.1%	0.7%	1.4%

- Please amend Table 6 to show the historical amounts for the gas years 2019/2020 and 2018/2019.
- Table 6 shows no further “Third-Party Services” acquired for the EGD CDA zone after the 2020/21 gas year. Have such services traditionally been part of each year’s EGD zones portfolio? What are the reasons for eliminating this service?

8.0 Reference: EGI 2021 Gas Plan, Table 14, page 42

Table 14 - Union South Rate Zone Design Day Position

Line No.	Particulars (TJ/d)	2020/21	2021/22	2022/23	2023/24	2024/25
Demand						
1	Union South	3,137	3,175	3,275	3,450	3,486
Supply Asset						
2	Great Lakes	106	106	106	106	106
3	Nexus	251	251	251	251	270
4	Non-obligated (e.g. Power Plants)	1,811	1,851	1,953	2,107	2,124
5	Ontario Dawn	60	60	60	60	60
6	Ontario Parkway	238	234	232	232	231
7	Panhandle	3	3	3	3	3
8	Storage	84	84	84	84	84
9	TCPL Long-Haul	542	543	544	565	566
10	TCPL Niagara	21	21	21	21	21
11	Vector	21	21	21	21	21
12	Total Supply	3,137	3,175	3,275	3,450	3,486
13	Excess(Shortfall)	-	-	-	-	-

* includes Sales Service, Bundled DP, T-Service

Please amend Tables 1 (Annual Demand Forecast) and 2 (Design Day Demand Forecast) to include the historical years 2019/2020 and 2018/2019.

9.0 Reference: EGI 2021 Gas Plan, Table 15, page 43

Please describe the methodology used to develop the average day demand analysis shown in Table 15.

10.0 Reference: EGI 2021 Gas Plan, page 49

“EGI holds 26.5 PJ of market storage capacity for use in the EGD rate zone. This storage capacity is held across 11 different non-renewable service agreements of varying terms and volumes. This diversity in term and volume allows EGI the flexibility to issue its annual RFP without needing to approach the market for all required storage capacity in any one year.”

- a) For the past gas year 2019/2020 what was the market storage capacity used by the EGD rate zones?
- b) How much of that capacity was self acquired (from EGI) or from an EGI affiliate?