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VIA RESS and EMAIL

April 22, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0004 – Enbridge Gas Inc. (Enbridge Gas)
2021 Annual Update to 5-Year Gas Supply Plan**

Enclosed with this letter is a Compendium containing materials for the April 26th/27th Stakeholder Conference for the Enbridge Gas 2021 Annual Update to its 5-Year Gas Supply Plan. For convenience, the Agenda for the Stakeholder Conference is included at Tab 1 of the Compendium.

As directed in the Ontario Energy Board (OEB) letter of February 19, 2021, Enbridge Gas aims to answer the written stakeholder questions at the Stakeholder Conference. Noting that there was a very large number of questions provided, and that some of the questions request specific numeric information or data, Enbridge Gas has determined that it is most efficient to answer some of the questions through its planned presentation, and some of the questions in writing.

Enbridge Gas notes that there are a small number of questions received that are outside of the scope of the 2021 Annual Update to the 5-Year Gas Supply Plan. These questions typically relate to items that are beyond the relevant timeframe, or to items that are not part of the gas supply planning process. An example of the former is the ED request for 30 year consumption forecasts.¹ An example of the latter is the Anwaatin request for details about community expansion plans.² Enbridge Gas does not intend to respond to the questions that are beyond the scope of this process.³

Tab 2 of the Compendium includes a copy of the presentation that Enbridge Gas will give at the Stakeholder Conference. The presentation sets out the main topic areas and key points that will be discussed. Enbridge Gas's gas supply team representatives will lead a discussion based on the presentation. The presentation will include more details on items noted in the presentation slides. There will be opportunity for additional questions and answers for each topic covered in the presentation, and at the

¹ ED 3(a) to (c).

² Anwaatin 1.

³ The specific written questions that are outside the scope of this process are: Anwaatin 1, 3, 4(b) and 5; ED 2, 3(a) to (c), 4(a) and (c), 6, 8(b) to (e), 9(b), 10(c); FRPO 5, 10, 12, 19, 22, 24 and 26; and PP 6(b).

end of the Stakeholder Conference. Note, however, that consistent with the process followed for the 5-Year Gas Supply Plan Stakeholder Conference process, Enbridge Gas does not intend to give undertakings to answer further questions that cannot be answered over the course of the Stakeholder Conference.

Enbridge Gas's gas supply team representatives for the presentation will be Jason Gillett (Director, Gas Supply), Dave Janisse (Supervisor, Gas Supply Procurement) and Steve Dantzer (Supervisor, Gas Supply Planning and Upstream Regulation). CVs for each of the Enbridge Gas representatives are included at Tab 3 of the Compendium.

Tab 4 of the Compendium includes written responses to certain stakeholder questions. The questions answered in the Compendium are items that are not amenable to being answered in the Stakeholder Conference presentation format (or that do not fit into the planned presentation). Enbridge Gas will answer appropriate follow-up questions (if any) at the Stakeholder Conference.

Finally, in the course of preparing for the Stakeholder Conference, Enbridge Gas has noted four corrections to be made to the previously filed 2021 Annual Update evidence. These items are Table 2 - Design Day Demand Forecast (Revised); Table 4 – Storage Requirement Forecast (Revised); Table 14 Union South Rate Zone Design Day Position (Revised); and Appendix H (Performance Metrics – now showing the 2019/2020 column). The corrected pages for each of these items are included at Tab 5 of the Compendium.

Should you have any questions on this matter please contact the undersigned.

Sincerely,

Joel Denomy
Technical Manager, Regulatory Applications

cc: David Stevens, Aird & Berlis LLP
All Interested Parties EB-2021-0004

EB-2021-0004 - 2021 Annual Update to 5 Year Gas Supply Plan

Enbridge Gas Inc. – Stakeholder Conference Compendium

Tab 1 – Stakeholder Conference Agenda

Tab 2 – Presentation

Tab 3 – Curriculum Vitae

- Jason Gillett (Director, Gas Supply)
- Dave Janisse (Supervisor, Gas Supply Procurement)
- Steve Dantzer (Supervisor, Gas Supply Planning and Upstream Regulation)

Tab 4 – Written Responses to Certain Stakeholder Questions

- Response to OEB Staff Questions:
 - Exhibit I.STAFF.5
 - Exhibit I.STAFF.6
 - Exhibit I.STAFF.7
- Response to Consumers Council of Canada and Vulnerable Energy Consumers Coalition Questions:
 - Exhibit I.CCC/VECC.4
 - Exhibit I.CCC/VECC.7
 - Exhibit I.CCC/VECC.8
- Response to Environmental Defence Questions
 - Exhibit I.ED.4
 - Exhibit I.ED.10
- Response to Federation of Rental Housing Providers of Ontario Questions:
 - Exhibit I.FRPO.5
 - Exhibit I.FRPO.16
 - Exhibit I.FRPO.25
- Response to Pollution Probe Questions
 - Exhibit I.PP.4
 - Exhibit I.PP.8
 - Exhibit I.PP.9
- Response to School Energy Coalition Question:
 - Exhibit I.SEC.4

Tab 5 - 2021 Annual Update to 5 Year Gas Supply Plan - Evidence Corrections

- Table 2 – Design Day Demand Forecast (Revised)
- Table 4 – Storage Requirement Forecast (Revised)
- Table 14 – Union South Rate Zone Design Day Position (Revised)
- Appendix H – Performance Metrics (showing the 2019/2020 column)

TAB 1

Stakeholder Conference Agenda: Consultation to Review 2021 Annual Update to Five-Year Natural Gas Supply Plans (EB-2021-0004)

Date/Time: April 26, 2021
9:30 am-4:30 pm

Location: Zoom Call Hosted by Ontario Energy Board

9:30 – 9:45	Welcome Remarks (OEB Staff)
9:45 – 10:15	Overview & Process
	• Introduction, Scope, Conference Format & Directing Questions to Appropriate Topic Areas
	• COVID 19 Impacts
10:15 – 10:45	Q&A
10:45 – 11:00	Morning Break
11:00 – 11:45	Changes to Existing Processes
	• Guiding Principles
	• Gas Supply Planning Process
	• Utility Integration
	• Gas Supply Organizational Changes
	• Blind RFP Process
11:45 – 12:30	Q&A
12:30 – 1:30	Lunch Break
1:30 – 2:00	Public Policy Initiatives & Pilots
	Incorporating Public Policy
	Key Public Policies
	Renewable Natural Gas
	Hydrogen
	Sustainable Natural Gas
2:00 – 2:45	Q&A
2:45 – 3:00	Afternoon Break
3:00 – 3:30	Market, Demand & Portfolio Changes
	• Demand Forecast – Methodology, Annual & Peak Day
	• Supply Option Analysis
	• Supply Portfolio
3:30 – 4:15	Q&A
4:15 – 4:30	Wrap Up

Stakeholder Conference: Consultation to Review 2021 Annual Update to Five-Year Natural Gas Supply Plans (EB-2021-0004)

Date/Time: April 27, 2021
9:30 am-2:45 pm

Location: Zoom Call Hosted by Ontario Energy Board

9:30 – 9:45	Welcome Remarks (OEB Staff)
9:45 – 10:15	Contracting Changes
	Contracting Changes
	Pipeline Renewals & Purchases
	Storage
10:15 - 11:00	Q&A
11:00 – 11:15	Morning Break
11:15 – 12:05	Performance Metrics
	• Details
12:05 – 1:05	Lunch Break
1:05 – 1:50	Q&A
1:50 – 2:30	Additional Q&A
2:30 - 2:45	Wrap-Up & Next Steps

TAB 2

2021 Annual Gas Supply Plan Update

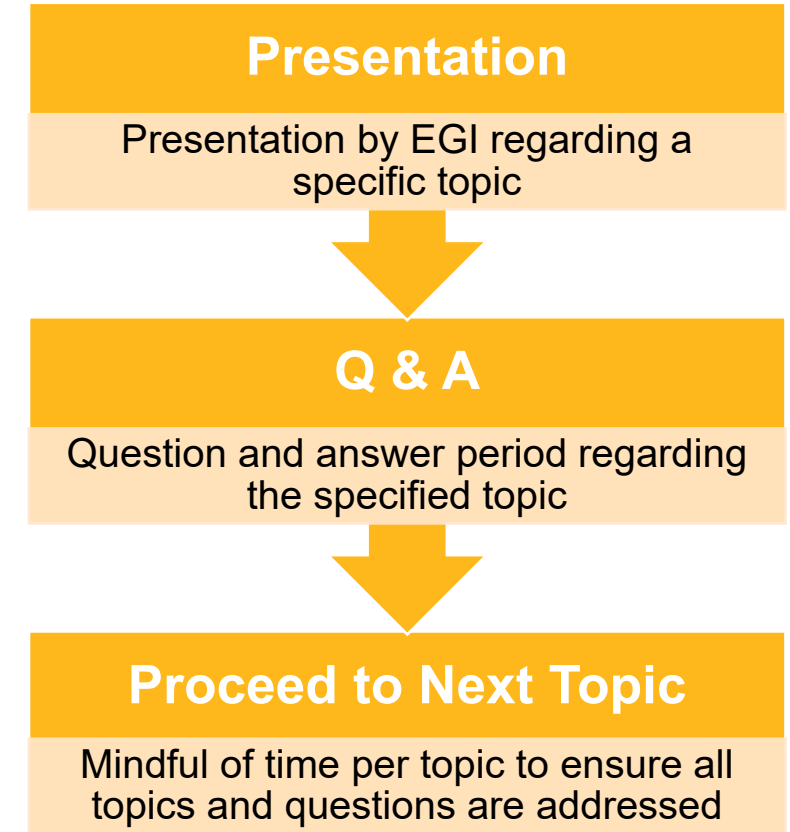
Stakeholder Conference Introduction

Stakeholder Conference scope

- The Gas Supply Framework, as outlined by the Board¹:
 - The annual Gas Supply Plan Update is an important tool for distributors to identify significant events that result in a change to the gas supply plans.
 - They will primarily focus on:
 - Updates to the Outlook section of the gas supply plan;
 - A description of significant changes from previous updates and;
 - A historical comparison of actuals to the Outlook.
- Costs are reviewed outside of this process:
 - QRAM
 - Annual rate and deferral applications
 - Rebasing

Stakeholder Conference format & approach

- Informed by the Board's guidance in Framework and Initiation letter dated Feb. 19, 2021.
- Presentation and Q&A to address pertinent questions received.
- Agenda distributed ahead of time to allow parties to plan their participation.
- Withhold questions until the presentation regarding that topic is complete.



Approvals sought and timing of future updates



- EG is not seeking approval of the Annual Update.
 - The Annual Update is a requirement of the OEB's Framework for the Assessment of Distributor Gas Supply Plans.
- In its Feb. 1, 2021 submission, EG requested that future Annual Updates be filed by March 1 of each year.
- March 1 aligns with EG's internal processes and provides an opportunity to include actual year-end information instead of preliminary or estimated results.

2021 highlights & agenda



- The 2021 Annual Gas Supply Plan Update reflects the following changes:
 1. Changes to existing processes.
 2. Public Policy initiatives and pilots.
 3. Market, demand and portfolio changes (including COVID-19 impacts).
 4. Contracting changes.
- EG has also included an overview of performance measurement results for the 2019/2020 gas year.

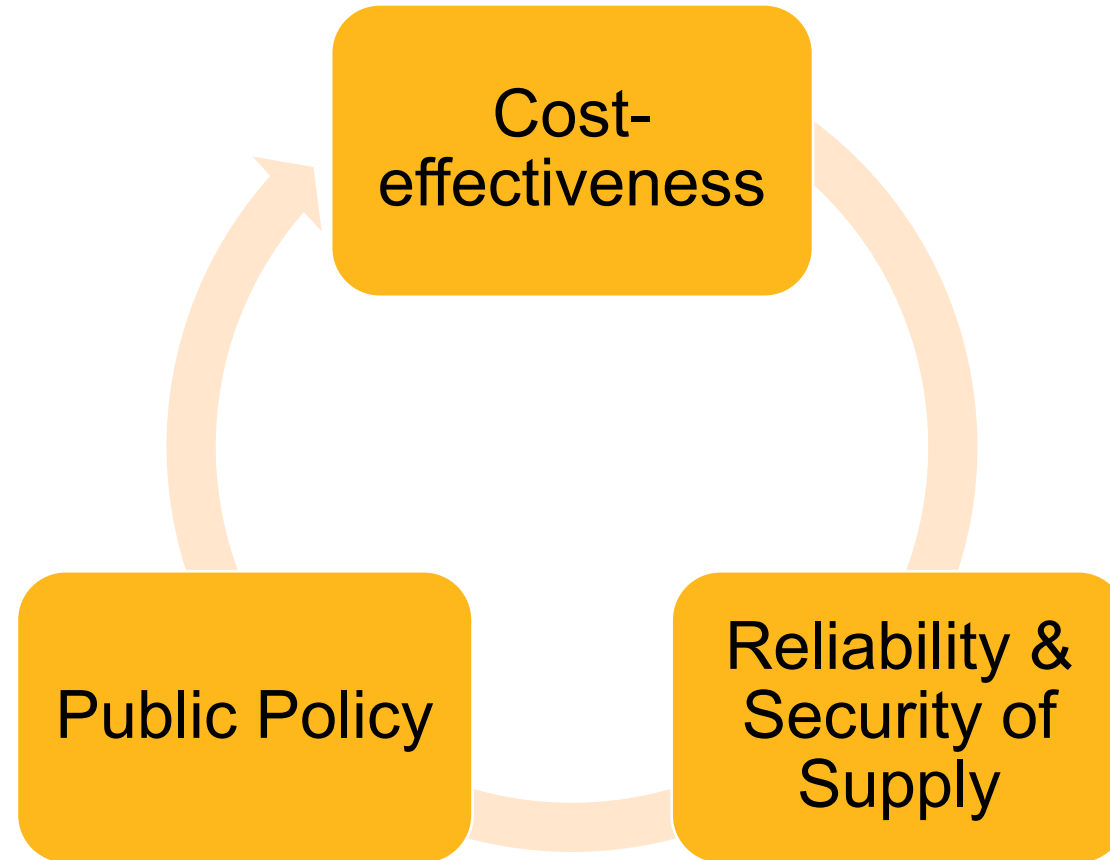
The COVID-19 pandemic

- There has been an unprecedented amount of uncertainty driven by the pandemic.
 - Provincial restrictions impacting Ontario businesses.
 - Dramatic shift to stay-at-home.
 - Crash of the oil market caused natural gas price fluctuations.
 - The expectations for utilities to manage impacts to customers.
- The flexibility in the Gas Supply Plan has allowed EG to adapt to changing circumstances brought on by the pandemic with no major changes required.
- EG continues to deliver secure, reliable, and cost-effective natural gas to customers.
- At this point, EG has not witnessed permanent destruction of demand for natural gas in Ontario.

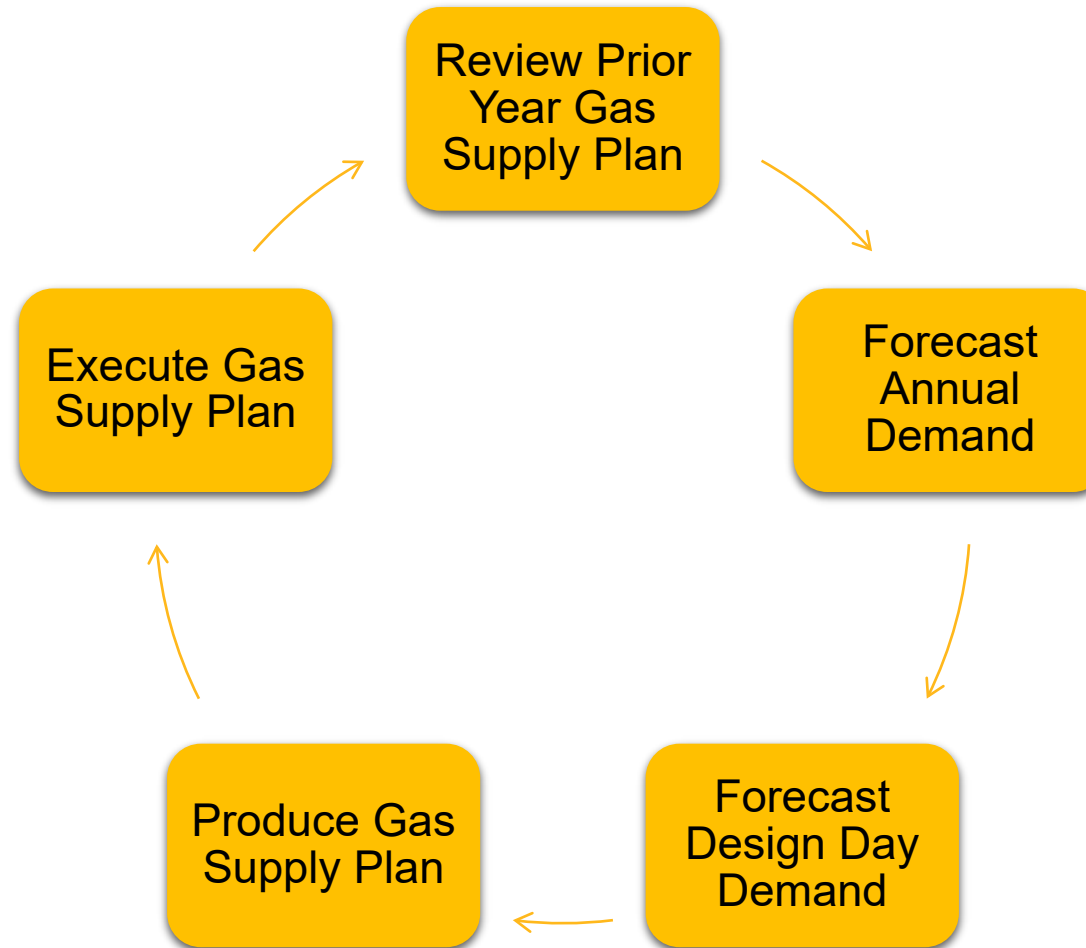
Q&A

1. Changes to existing processes

Guiding principles



Gas Supply Planning process



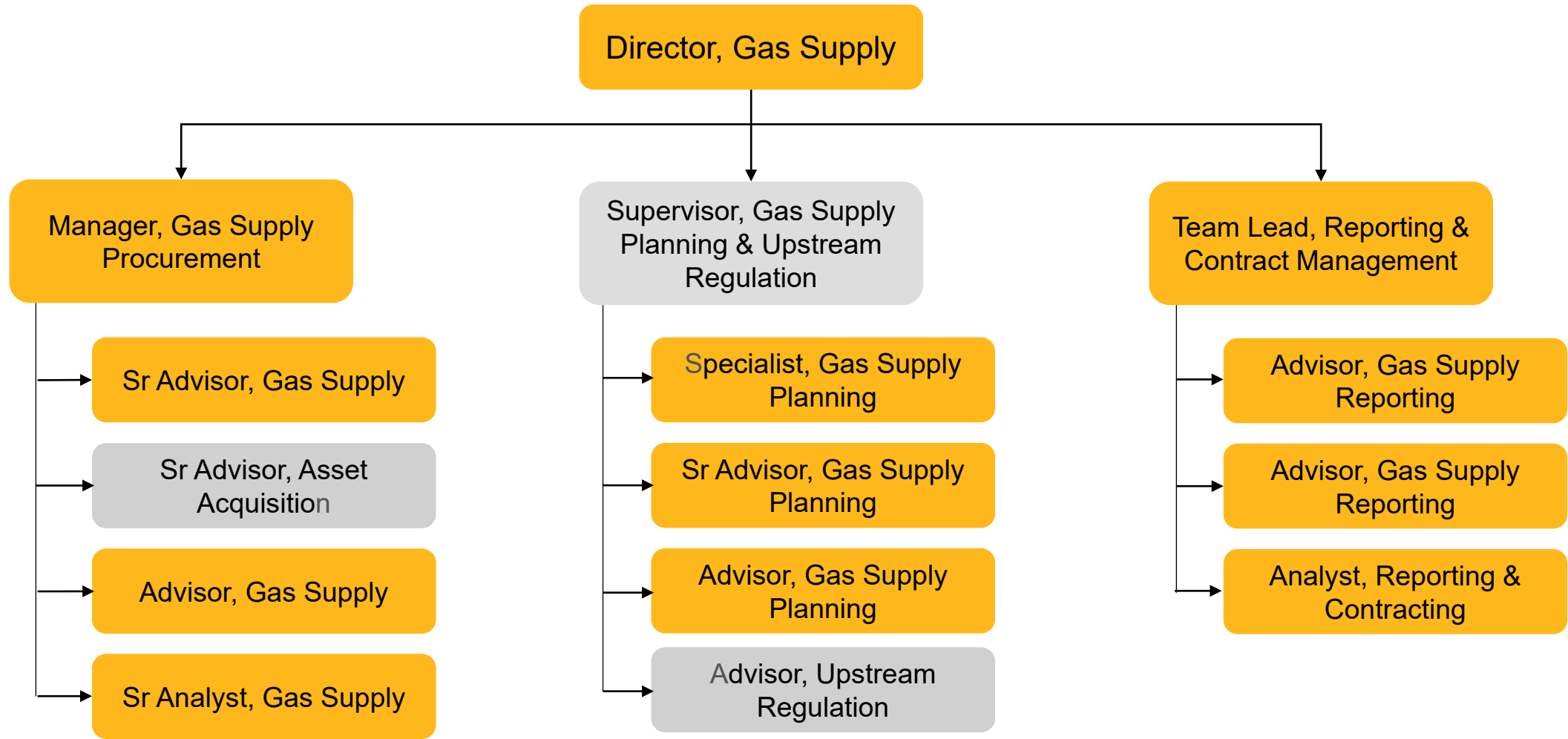
Utility integration

- EGI continues to integrate the legacy utilities and determine its plan for rebasing.
- Although we have a single Gas Supply Plan, the two legacy gas supply portfolios cannot be combined prior to rebasing as certain changes require OEB approval.
 - Design day weather criteria methodology.
 - In-franchise use of storage space and deliverability.
 - Approvals outside of Gas Supply planning include rate and service design, degree day forecast methodology, UFG, average use methodology, etc.
- Changes that do not require OEB approval are being implemented, when appropriate.
 - Organizational changes.
 - Alignment of internal process, forecasting, policies, and reporting.
- Stakeholders will be engaged at the appropriate time, including future annual gas supply plan updates or prior to the rebasing application depending on the topic and timing of changes.

Gas Supply organizational changes

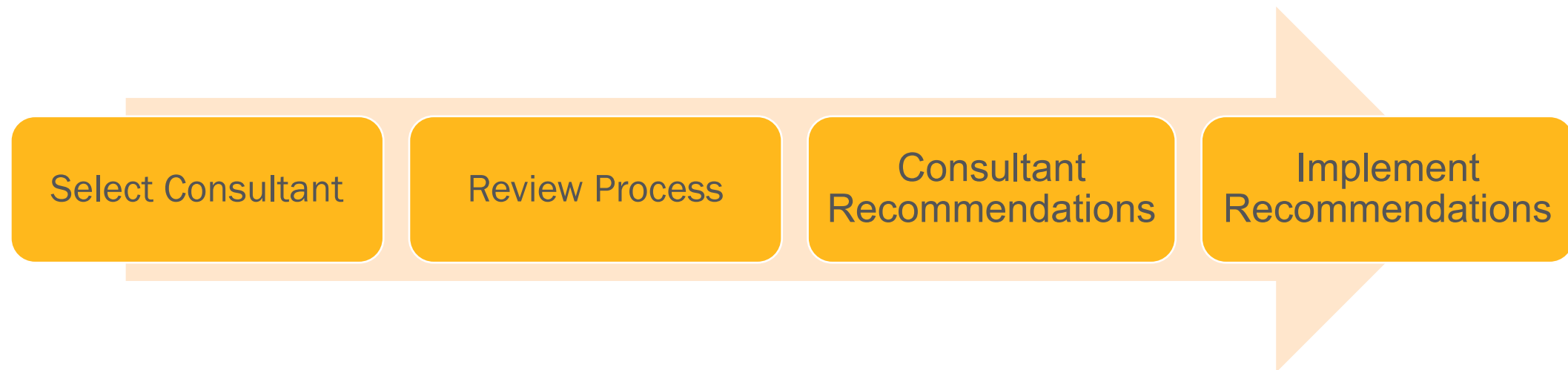
- Further changes were made to the Gas Supply organizational structure to align the responsibility for procurement of storage and transportation assets with the team responsible for procurement of gas commodity.
- The accountability for EG's upstream regulatory function has been moved to Gas Supply.
 - Monitoring of regulatory matters impacting upstream transportation assets held by EG.
 - Management of reporting requirements associated with EG assets regulated outside of the OEB.

Gas Supply organizational chart



Blind RFP process evaluation

- OEB staff recommended an independent assessment of the blind RFP process.
- EG solicited proposals for this engagement from consulting firms.
- ScottMadden Consulting was selected as the winning proposal.

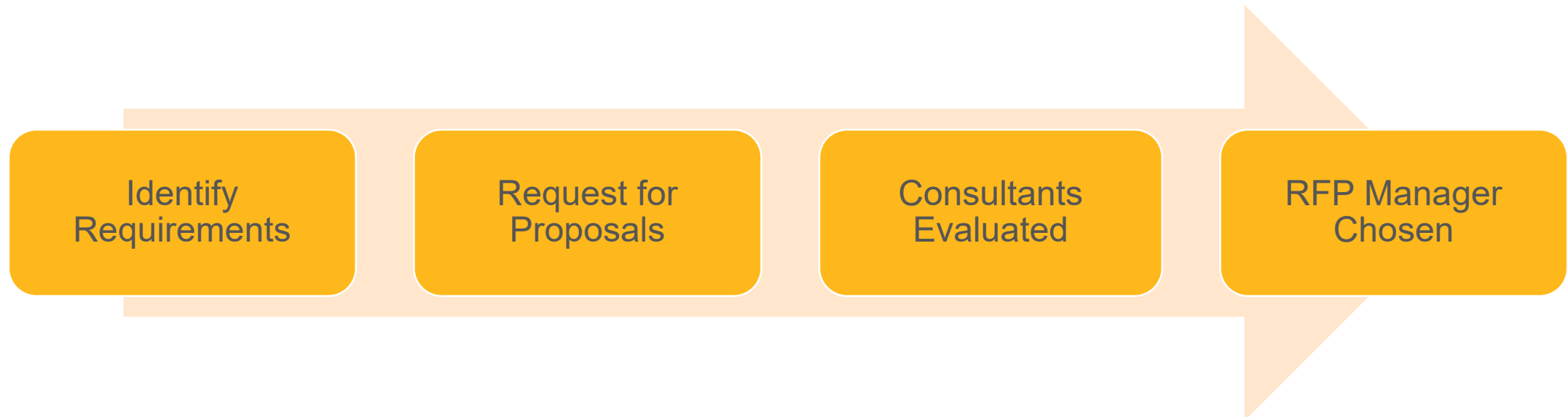


Blind RFP process enhancements

- Key recommendations from ScottMadden:
 - Expand criteria and requirements for choosing external RFP manager.
 - Document roles and responsibilities of EG and the external RFP manager.
 - Revise RFP letter, bid template, and bid instructions to increase clarity and reduce follow-up questions from RFP bidders.
 - Extend bidding period to allow bidders more time to submit proposals.
 - Have the external RFP manager conduct Round 1 of bid evaluations and provide initial rankings and recommendations to EG.
- Recommendations were implemented into the EG process.
 - Minor adjustments were made for the workshop and the generic email address.

RFP Manager selection process

- EG identified prerequisites that would allow the RFP Manager to evaluate and recommend bids independently.
- The request for proposals were only sent to well-established consulting firms.
- Multiple responses were received, which were evaluated along with interviews with the potential RFP Manager and any supporting staff.



2021 Blind RFP process

- Details of the process:
 - Blind RFP for storage services beginning April 1, 2021.
 - RFP Issued Jan. 4 and closed Jan. 25.
 - Blind RFP process modified per ScottMadden recommendations.
 - RFP Manager recommended winning bids per evaluation criteria.
 - Recommendations were accepted by EG.
- Alignment with OEB Staff suggestions.
 - Blind RFP Manager had experience and knowledge to evaluate storage bids.
 - The process allowed for anonymous recommendations to be ranked and accepted.

Q&A

2. Public Policy initiatives and pilots

Incorporating public policy

- *“The gas supply plan will be developed to ensure that it supports and is aligned with public policy where appropriate.” – Framework, p8*
- Section 3.1.4 of the Framework indicates that *“The distributor is to identify and demonstrate the public policy that their gas supply plan is supporting and how they’ve balanced achieving this with the other guiding principles in this Framework. **They should be public policy initiatives that are in effect rather than proposed public policy initiatives.**”* (emphasis added)
- EG will speak to the aspects of public policy that impact the gas supply plan, including the execution of the gas supply function in accordance with the guiding principles set forth by the OEB in the Framework.

Key public policies

- The Government of Ontario's Made-in-Ontario Environmental Plan ("MOEP")
- The Federal Government's Greenhouse Gas Pollution Pricing Act ("GGPPA")
- The Federal Government's Clean Fuel Standard (CFS)

Renewable Natural Gas (RNG)

- Enbridge Gas' Voluntary RNG program was approved on a pilot basis in fall 2020.
- General service customers who obtain their gas supply from Enbridge Gas will have the option to pay a \$2 monthly charge to fund the incremental cost of procuring RNG as part of the overall system gas supply.
- Program launched on April 6, 2021. Customers can participate in the program by applying online through Enbridge Gas' website or by phone.
- Enbridge Gas will monitor customer participation in the program and expects to begin procuring RNG by the end of the year.



Hydrogen

- Enbridge Gas' Low Carbon Energy Project (LCEP) was approved on a pilot basis in Fall 2020.
- Pilot project will have natural gas blended with up to 2% hydrogen gas for approximately 3,600 customers in Markham, Ontario.
- Blended gas will emit less greenhouse gas emissions than traditional natural gas.
- Pilot project will provide valuable technical experience with hydrogen blending to potentially apply to other parts of the system.



Sustainable Natural Gas (SNG)

- SNG is a new and emerging trend in the North American natural gas industry.
- SNG certifications measure a natural gas producer's conformance to a number of ESG standards.
- EG is investigating SNG frameworks and exploring opportunities for the potential inclusion of SNG within its system supply portfolio.
- EG's assessment of SNG opportunities will consider factors such as supply diversity, liquidity, reliability and counterparty credit risk.

Sustainable Natural Gas (SNG)

- Equitable Origins (EO100 Standard) evaluates a producer's air and water quality, carbon emissions and relations with Indigenous communities.
- While SNG is not emission-free, the certifications demonstrate that it's being produced using industry leading sustainability practices.
- EGI estimates that a producer may charge \$0.05 - \$0.15 per GJ above their pre-certification price
- The exact price charged for SNG may be higher or lower than competing offers for non-certified supply
- SNG's impact to the total cost of the gas portfolio would be negligible

Q&A

3. Market, Demand and Portfolio Changes

EG Demand Forecast methodology

- EG annual demand forecast is based on OEB-approved methodologies.
- EG is currently evaluating its annual demand forecast methodologies and will provide the results, including any proposed changes, as part of its rebasing application.

COVID-19 impacts on EG forecasts

- The 2021 demand forecast was prepared in summer 2020.
- Certain inputs into the demand forecasting process incorporate adjustments due to COVID-19, such as housing starts and other macro-economic indicators.
- It is expected that temporary demand reductions experienced in 2020 will continue to recover in 2021.

2020 consumption variances

- From March to December 2020, general service consumption was 9% lower than 2019.
- Most of this reduction was due to weather.
- Approximately 2.5% is attributable to other factors such as COVID-19.
 - Residential was flat compared to 2019.
 - Non-residential decreased 5% compared to 2019 (April/May 2020 was 10% lower).

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
	<u>Demand</u>										
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
	<u>Supply Asset</u>										
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%

Union North Rate Zone Design Day position

Line No.	Particulars (TJ/d)	North West					North East				
		2020/21	2021/22	2022/23	2023/24	2024/25	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>Demand</u>										
1	Union North	128	128	128	128	127	398	404	406	410	409
	<u>Supply Asset</u>										
2	TCPL Long-Haul	78	78	78	78	78	4	4	4	4	4
3	TCPL Short-Haul	-	-	-	-	-	120	120	120	120	120
4	North Dawn T-Service	-	-	-	-	-	33	33	33	33	33
5	LNG	-	-	-	-	-	0	0	0	2	0
6	Redelivery from Storage										
7	<i>From Parkway</i>										
8	STS Withdrawals	30	30	30	29	29	84	87	88	88	88
9	STS Pooled Withdrawals	-	-	-	-	-	13	16	16	16	16
10	Short-haul Firm	-	-	-	-	-	119	119	119	119	119
11	Enhanced Market Balancing	-	-	-	-	-	25	25	25	25	25
12	<i>From Dawn</i>										
13	STS Withdrawals	20	20	20	20	20	-	-	-	-	-
14	Total Supply	128	128	128	127	127	398	404	406	408	406
15	Excess(Shortfall)	0	0	0	0	0	0	0	0	-2	-3
16	Shortfall % of Demand	0.1%	0.1%	0.1%	0.2%	0.2%	0.0%	0.0%	0.0%	0.4%	0.7%

Union South Rate Zone Design Day position

Line No.	Particulars (TJ/d)	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>Demand</u>					
1	Union South	3,118	3,269	3,325	3,351	3,540
	<u>Supply Asset</u>					
2	Great Lakes	21	21	21	21	21
3	Nexus	106	106	106	106	106
4	Non-obligated (e.g. Power Plants)	254	254	273	273	273
5	Ontario Dawn	520	560	566	566	569
6	Ontario Parkway	227	240	242	242	240
7	Panhandle	60	60	60	60	60
8	Storage	1,822	1,920	1,949	1,975	2,162
9	TCPL Long-Haul	3	3	3	3	3
10	TCPL Niagara	21	21	21	21	21
11	Vector	84	84	84	84	84
12	Total Supply	3,118	3,269	3,325	3,351	3,540
13	Excess(Shortfall)	-	-	-	-	-
* includes Sales Service, Bundled DP, T-Service						

Supply option analysis – Enbridge CDA

Table 8 - Enbridge CDA Evaluation Matrix

Option	Reliability	Flexibility	Diversity	Costs (\$Millions/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	↑	→	↑	23.78	<1%	Yes
Short-haul: D-P	↑	→	→	4.71	<1%	No
Short-haul: Dawn	↑	→	→	2.78	<1%	No
Short-haul: Niagara	→	→	→	3.36	<1%	No
Third-Party	→	↓	↑	1.80	<1%	Unknown ⁵⁸

Supply option analysis – Enbridge EDA

Table 10 - Enbridge EDA Evaluation Matrix

Option	Reliability	Flexibility	Diversity	Costs (\$Millions/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟢	🟢	🟡	3.69	<1%	Yes
Short-haul: D-P	🟢	🟡	🟡	1.17	<1%	No
Short-haul: Niagara	🟡	🟡	🟢	1.07	<1%	No
Short-haul: Iroquois	🟡	🟡	🟢	0.55	<1%	No
Third-Party	🟡	🔴	🟢	0.28	<1%	Unknown ⁶⁰

Design Day analysis outcomes

EGD Rate Zone

- Small design day shortfalls projected in Enbridge CDA and Enbridge EDA.
- EG to manage shortfalls with third-party services.

Union North Rate Zones

- No design day shortfalls projected in Union North West.
- Small shortfalls projected in Union North East beginning 2023/24.
- No immediate action to be taken.

Union South Rate Zone

- No design day shortfalls projected.
- No action required.

Average Day position

- Minimal average day growth projected in EGD and Union rate zones.
- No significant changes beyond renewals.

Table 15 - Average Day Demand Analysis for System Sales Service Customers

Line No.	Particulars (TJ)	2020/21	2021/22	2022/23	2023/24	2024/25	Growth 2020 → 2024
<u>EGD</u>							
1	Annual Demand	312,819	314,448	316,145	318,453	319,037	6,218
2	Daily Demand	857	862	866	870	874	17
<u>Union</u>							
3	Annual Demand	190,216	191,669	191,904	193,315	192,626	2,409
4	Daily Demand	521	525	526	528	528	7

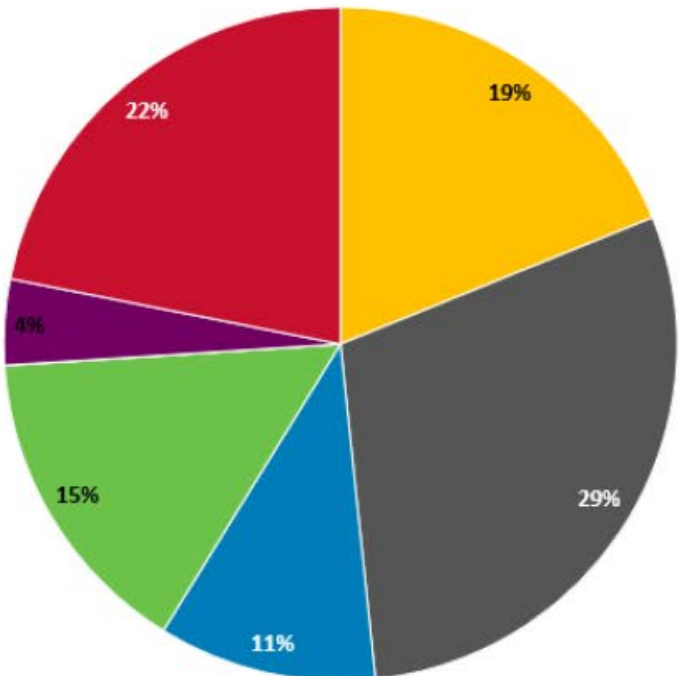
Average Day growth evaluation matrix

Table 17 - Average Day Growth Evaluation Matrix

Option	Relative to Status Quo			Costs (\$/GJ)	Average Cost/Customer Impact - Relative to Status Quo	Available Capacity
	Reliability	Flexibility	Diversity			
Dawn	-	-	-	4.28	-	Yes
Dawn LTFP	➡	➡	➡	4.24	<1%	Yes ⁶⁶
Great Lakes	➡	➡	➡	4.31	<1%	No
MichCon	➡	➡	⬆	4.40	<1%	No ⁶⁷
Vector	➡	➡	➡	4.36	<1%	No
Panhandle	➡	➡	➡	5.04	<1%	Yes ⁶⁸
NEXUS	➡	➡	➡	4.36	<1%	Yes
Rover	➡	➡	⬆	4.48	<1%	Yes
Niagara	➡	➡	➡	4.30	<1%	No

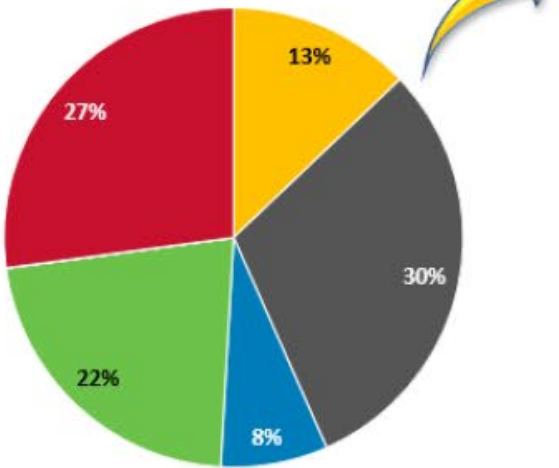
Supply portfolio

2020/21 EGI Supply Portfolio

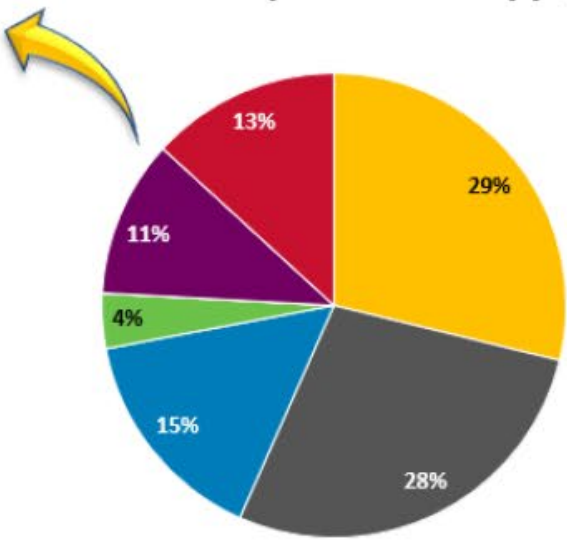


- Appalachia
- Dawn
- Chicago
- Niagara Region
- Peaking/Seasonal
- U.S. Mid-Continent
- WCSB

2020/21 EGD Supply Portfolio



2020/21 Union Supply Portfolio



Q&A

4. Contracting changes

Contracting changes

- EG made three significant contracting decisions in 2020.
- Renewals
 - EGD rate zone:
 - Vector 65,000Dth/d 3-year renewal
 - NGTL 50,000 GJ/d 3-year renewal
 - NGTL 75,000 GJ/d 3-year, 10-month renewal
- New Capacity
 - Union rate zone:
 - NEXUS 25,000 GJ/d 17-month capacity

Pipeline renewals and purchases

- NEXUS pipeline purchase
 - Union rate zone.
 - Capacity: 25,000 Dth/d.
 - Service: FT (Clarington to Kensington).
 - 17-month term.
 - Improves supply diversity by increasing access to supply at Clarington.
 - Competitively-priced toll is expected to be largely offset by lower commodity pricing.

Pipeline renewals and purchases

- Vector pipeline renewal
 - EGD rate zone.
 - Capacity: 65,000 Dth/d.
 - 3-year renewal.
 - Path: Chicago to Dawn.
 - Competitively-priced toll.
 - Maintains supply diversity.
 - Vector pipeline has provided reliable firm transportation to EG for many years.

Pipeline renewals and purchases

- NGTL pipeline renewals
 - EGD rate zone.
 - Capacity: 50,000 GJ/d & 75,000 GJ/d.
 - 3-year & 3-year, 10-month renewals.
 - Service: FT-D (AECO to Empress).
 - Diversifies supply between AECO and Empress.
 - 3+ year terms qualify for a discounted toll.
 - Term facilitates longer-term liquids extraction deals with favourable pricing.

Current storage assets

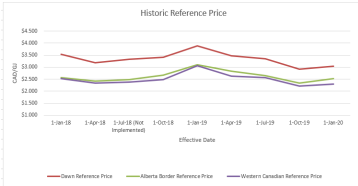
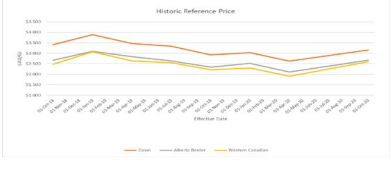
- Union Rate Zone
 - 100 PJ of cost-based storage .
 - 97.1 PJ required for 2019/2020 .
 - "Excess storage" sold at market rates.
 - Sharing mechanism of 90% ratepayer, 10% shareholder.
- Enbridge Rate Zone
 - 99.7 PJ of cost-based storage.
 - 26.4 PJ of market-based storage acquired through blind RFP.

Q&A

5. Performance metrics

Performance metrics

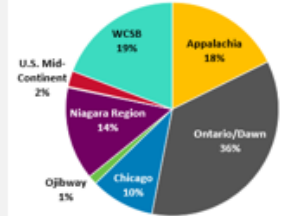
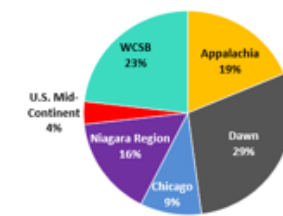


OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
COST EFFECTIVENESS					
The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.	Policies and Procedures	Demonstrates EGI's consideration of timely pricing information and the utility's ability to transact according to internal policies for managing counterparty risk	Procurement plan reviewed and approved as outlined in the policy	C	C
			Transacting counterparties have met appropriate credit requirements	C	C
	Weather Variance ¹	Illustrates weather risk in EGI's Plan correlated with price variances (e.g. Positive HDD variances tends to lead to higher prices)	HDD Variance - EGD CDA	6%	1%
			HDD Variance - EGD EDA	9%	2%
			HDD Variance - EGD Niagara	6%	0%
			HDD Variance - Union North West	10%	5%
			HDD Variance - Union North East	3%	-2%
			HDD Variance - Union South	3%	-1%
	Price Effectiveness	Demonstrates the diversity of supply terms within EGI's procurement plan through a layered approach to contracting	Distribution of procurement supply terms:		
			Less than one month	14%	3%
			Monthly	28%	27%
			Seasonal	25%	36%
			Annual or longer	32%	34%
		Illustrates price stability and consistency in EGI's Plan	Reference Price ²		

Performance metrics (cont'd)

OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
The gas supply plans will ensure the reliable and secure supply of gas. Reliability and security of supply is achieved by ensuring gas supply to various receipt points to meet planned peak day and seasonal gas delivery requirements.	Design Day	Demonstrates the extent to which EGI is able to procure assets required to meet design day demand, indicating the reliability of the plan	Acquired assets to meet design day requirements, as identified by the plan	100%	100%
	Storage	Demonstrates EGI's execution of its storage inventory strategy	Percentage of actual storage target at November 1 compared to the plan	98%	98%
			Percentage of actual storage target at February 28 compared to the plan	100%	100%
			Percentage of actual storage target at March 31 compared to the plan	95%	100%
	Communication	Ensure ongoing communication and understanding between planning and operations teams	Meet once a month at a minimum to discuss inventory position relative to targets and what action is required	C	C
			Instances when QRAM expected bill impacts exceed +/- 25% on the commodity portion of a customer's bill	0	2
			Communicated to ratepayers when bill impacts on the commodity portion of a customer's bill exceed +25%	C	C

Performance metrics (cont'd)

OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
RELIABILITY AND SECURITY OF SUPPLY					
	Diversity	Illustrates EGI's diversity of basin, contract term, counterparties and supply procurement in the plan	Supply basin diversity ³		
			Percentage of contracts with remaining terms		
			1-5 years	23%	15%
			6-10 years	33%	44%
			> 10 years	44%	40%
			Total number of unique counterparties	56	58
			Total number of receipt points	27	29
	Reliability	Reports EGI's experience with pipeline and supply disruptions demonstrating the reliability of the portfolio	Number of days of force majeure on upstream pipelines that reduced capacity	0	0
			Number of days of force majeure on upstream pipelines impacting customers' security of supply	0	0
			Number of days of failed delivery of supply	61	74
			Number of days of failed delivery of supply impacting customers security of supply	0	0
			Number of days of forced majeure on storage assets	0	0

Performance metrics (cont'd)

OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
PUBLIC POLICY					
The gas supply plan will be developed to ensure that it supports and is aligned with public policy where appropriate.	Supporting Policy	Reports public policy considered in EGI's Plan	Community expansion addressed in the plan	C	C
			DSM savings addressed in the plan	C	C
			Federal Carbon Pricing Program addressed in the plan	C	C
			Percentage of RNG portfolio	0%	0%

Q&A

TAB 3

CURRICULUM VITAE OF
JASON GILLET

Experience: Enbridge Gas Inc.

Director, Gas Supply
2020

Manager, Strategic and Power Markets
2019

Union Gas Limited

Strategic Markets Account Manager
2016

Manager, Upstream Regulation
2015

Manager, Transportation Acquisition
2014

Manager, Planning and Technology
2009

IT Project and Operations Manager
2007

Application Specialist
2007

Application Developer
2003

Education: Bachelor of Science, Computer Science
Western University, London, Ontario, Canada, 2003

Appearances: Ontario Energy Board
EB-2020-0091
EB-2020-0094
EB-2015-0166

Canadian Energy Regulator
RH-001-2016

CURRICULUM VITAE OF
DAVID JANISSE

Experience: Enbridge Gas Inc.

Supervisor, Gas Supply
2020-Present

Specialist, S&T Sales
2019-2020

Union Gas Limited

Senior Advisor, Strategic Sales
2018-2019

Senior Buyer, Carbon Markets
2017-2018

Senior Buyer, Gas Supply
2015-2017

Buyer, Gas Supply
2014-2015

Financial Planning & Forecast Analyst
2012-2014

Financial Analyst, CA Stream
2010-2012

Education: Chartered Professional Account, Chartered Accountant
2013

Honours Bachelor of Commerce, University of Windsor
2010

Appearances: (Ontario Energy Board)
EB-2020-0066
EB-2017-0255

CURRICULUM VITAE OF
STEVE DANTZER

Experience: Enbridge Gas Inc.

Supervisor, Gas Supply Planning
2020

Supervisor, Upstream Regulation
2019

Specialist, Carbon
2018

Union Gas Limited

Program Manager, Cap and Trade
2016

Project Manager, Upstream Regulation
2013

Team Lead, General Accounting
2012

Team Lead, Affiliate Reporting
2010

Senior Analyst, Financial Reporting
2008

Education: Chartered Professional Accountant, Chartered Accountant
2006

Honours Business Commerce, University of Windsor
2004

Memberships: Chartered Professional Accountants Canada

Chartered Professional Accountants of Ontario

Appearances: Ontario Energy Board
EB-2017-0255

TAB 4

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

INTERROGATORY

Question:

Impact of Federal Carbon Charge

As of April 1, 2021, the Federal Carbon Charge that Enbridge Gas must remit to the Government of Canada under the GGPPA for eligible volumes of natural gas will increase from \$30 per tonne of carbon dioxide equivalent (tCO₂e) to \$40 per tCO₂e. Enbridge Gas indicated on pages 18-22 that the demand forecast underpinning the 2021 Annual Update includes this Federal Carbon Charge in the price-related demand driver variables used in its regression equations. In your presentation, please discuss the following:

- a) Please explain how the 2021 Federal Carbon Charge has impacted the demand forecast for 2021. Please provide the output of the regression equations.
- b) How has the 2021 Federal Carbon Charge impacted the overall gas supply plan outlook for 2021? Has Enbridge Gas made any adjustments to the 2021 GSP as a result of the updated federal carbon charges? If yes, please explain the adjustments.

Response:

- a) EGI includes price-related demand driver variables in the regression models for some general service customers. However, the annual demand response is relatively inelastic to price changes. A price increase of 10% yields a response of approximately 0.5% lower total annual demand.

The carbon charge increase to \$40 per tCO₂e in 2021 from \$30 per tCO₂e in 2020 is equivalent to an increase of approximately 2 cents per m³, and this causes the price driver variables used in the equations to increase by between 4% and 8% depending on the customer class. Without this increased price in 2021, the annual demand forecast in 2021 would have been slightly higher, with all other demand drivers being equal.

In 2021, the carbon tax portion included in the price variables accounts for approximately 20% of the total price. If there were no carbon tax present in the 2021 models, Enbridge Gas estimates that the forecasted annual demand in 2021 would be approximately 1% higher.

Please see the Attachment to this response for the regression equations.

b) Addressed in Stakeholder Day presentation.

RATE 1 REVENUE CLASS 20 REGRESSION EQUATIONS

Metro Region - Central Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.67	6.53	0.00
LOG(CDD)	0.69	13.49	0.00
LOG(REALCRCRPG)	-0.04	-1.31	0.20
LOG(MET20VINT)	0.65	7.31	0.00
DUM2008	0.01	0.36	0.72
DUM2010	-0.02	-0.68	0.50
R-squared	0.98		
Adjusted R-squared	0.97		
S.E. of regression	0.02		
F-statistic	248.89		0.00

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.00	0.26	0.80
DLOG(CDD)	0.75	19.61	0.00
DLOG(MET20VINT)	0.84	2.44	0.02
DUM2008	0.00	0.19	0.85
ECM_MET20(-1)	-0.94	-4.97	0.00
R-squared	0.93		
Adjusted R-squared	0.93		
S.E. of regression	0.02		
F-statistic	104.03		0.00

Western Region - Central Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.13	1.61	0.12
LOG(CDD)	0.64	10.80	0.00
LOG(REALCRCRPG)	-0.07	-2.09	0.05
LOG(WES20VINT)	0.57	2.50	0.02
LOG(CENTEMP)	0.10	0.64	0.53
DUM2008	-0.02	-0.99	0.33
DUM2010	-0.05	-1.89	0.07
R-squared	0.96		
Adjusted R-squared	0.96		
S.E. of regression	0.03		
F-statistic	128.25		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-0.01	-1.05	0.30
DLOG(CDD)	0.70	16.43	0.00
DLOG(REALCRCRPG)	-0.02	-0.46	0.65
DUM2008	0.00	0.00	1.00
ECM_WES20(-1)	-0.99	-5.25	0.00
R-squared	0.91		
Adjusted R-squared	0.90		
S.E. of regression	0.03		
F-statistic	75.17		0.000

Central Region - Central Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.166	1.79	0.08
LOG(CDD)	0.641	9.59	0.00
LOG(REALCRCRPG)	-0.004	-0.12	0.90
LOG(CEN20VINT)	0.811	4.11	0.00
LOG(CENTEMP)	0.097	0.73	0.47
DUM2008	-0.051	-2.21	0.04
R-squared	0.96		
Adjusted R-squared	0.96		
S.E. of regression	0.03		
F-statistic	147.65		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.01	0.51	0.62
DLOG(CDD)	0.68	13.75	0.00
DLOG(REALCRCRPG)	-0.03	0.65	0.52
DUM2008	-0.01	-0.48	0.63
DLOG(CEN20VINT)	1.06	1.49	0.15
ECM_CEN20(-1)	-0.96	-5.14	0.00
R-squared	0.89		
Adjusted R-squared	0.87		
S.E. of regression	0.03		
F-statistic	46.05		0.000

Northern Region - Central Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.93	2.24	0.03
LOG(CDD)	0.62	9.55	0.00
LOG(REALCRCRPG)	-0.04	-1.07	0.29
LOG(NOR20VINT)	0.71	3.34	0.00
LOG(CENTEMP)	0.03	0.19	0.85
DUM2009	-0.07	-2.65	0.01
R-squared	0.97		
Adjusted R-squared	0.96		
S.E. of regression	0.03		
F-statistic	179.29		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.00	0.21	0.83
DLOG(CDD)	0.67	14.26	0.00
DLOG(REALCRCRPG)	-0.02	0.34	0.73
DLOG(NOR20VINT)	0.87	1.50	0.14
ECM_NOR20(-1)	-1.00	-5.51	0.00
R-squared	0.89		
Adjusted R-squared	0.88		
S.E. of regression	0.03		
F-statistic	60.44		0.000

Eastern Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.45	4.06	0.00
LOG(EDD)	0.68	9.19	0.00
LOG(REALERCPRPG)	-0.02	-0.58	0.56
LOG(ERC20VINT)	0.75	8.19	0.00
DUM2008	-0.03	-1.15	0.26
DUM2010	-0.06	-2.31	0.03
R-squared	0.97		
Adjusted R-squared	0.97		
S.E. of regression	0.03		
F-statistic	191.64		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.00	-0.68	0.51
DLOG(EDD)	0.77	13.09	0.00
DLOG(ERC20VINT)	0.53	0.99	0.33
ECM_ERC20(-1)	-1.02	-2.43	0.02
AR(1)	-0.13	-0.30	0.76
R-squared	0.89		
Adjusted R-squared	0.87		
S.E. of regression	0.03		
F-statistic	55.94		0.000

Niagara Weather Zone

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.49	3.87	0.00
LOG(NDD)	0.68	8.43	0.00
LOG(REALNRCRPG)	-0.07	5.56	0.00
LOG(NRC20VINT)	0.88	0.24	0.81
DUM2008	0.01	-0.73	0.47
DUM2010	-0.03	-1.70	0.10
R-squared	0.95		
Adjusted R-squared	0.95		
S.E. of regression	0.04		
F-statistic	120.67		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-0.01	-1.93	0.06
DLOG(NDD)	0.74	13.20	0.00
ECM_NRC20(-1)	-0.61	-3.52	0.00
R-squared	0.86		
Adjusted R-squared	0.85		
S.E. of regression	0.03		
F-statistic	92.13		0.000

RATE 6 REVENUE CLASS 12 REGRESSION EQUATIONS

Central Revenue Class 12 (Apartment)

Single Equation Model

Variable	Coefficient	t-Statistic	p-Value
C	1.62	0.88	0.38
LOG(CDD)	0.57	4.21	0.00
LOG(CENTEMP)	0.68	4.10	0.00
DUM1996	-0.11	-2.74	0.01
DUM2008	0.22	3.42	0.00
AR(1)	0.39	2.22	0.03
R-squared	0.94		
Adjusted R-squared	0.93		
S.E. of regression	0.06		
F-statistic	89.543		0.000

Eastern Revenue Class 12 (Apartment)

Single Equation Model

Variable	Coefficient	t-Statistic	p-Value
C	4.71	2.54	0.02
LOG(EDD)	0.47	4.76	0.00
LOG(TIME)	-0.05	-2.50	0.02
DUMERC12	0.26	7.13	0.00
DUM2011	-0.13	-3.31	0.00
LOG(REALERCCPG)	-0.12	-2.03	0.05
LOG(EASTEMP)	0.37	1.51	0.14
DUM2014	0.11	4.23	0.00
R-squared	0.95		
Adjusted R-squared	0.94		
S.E. of regression	0.04		
F-statistic	71.14		0.000

Niagara Revenue Class 12 (Apartment)

Single Equation Model

Variable	Coefficient	t-Statistic	p-Value
C	5.87	3.86	0.00
LOG(NDD)	0.47	5.55	0.00
LOG(TIME)	-0.02	-1.38	0.18
LOG(NIAGEMP)	0.21	0.96	0.35
LOG(REALNRCCPG)	-0.03	-0.71	0.48
DUMNRC12	-0.05	-2.06	0.05
DUM2011	-0.07	-2.26	0.03
AR(1)	0.03	0.15	0.88
R-squared	0.83		
Adjusted R-squared	0.79		
S.E. of regression	0.04		
F-statistic	18.52		0.000

RATE 6 REVENUE CLASS 48 REGRESSION EQUATIONS

Central Revenue Class 48 (Commercial)

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-3.58	-1.82	0.08
LOG(CDD)	0.78	8.05	0.00
LOG(TIME)	-0.21	-5.98	0.00
LOG(CRCCOMVAC)	-0.06	-1.97	0.06
LOG(ONTGDP)	0.58	4.32	0.00
LOG-REALCRCCPG)	-0.11	-2.81	0.01
DUM2008	0.08	2.78	0.01
R-squared	0.87		
Adjusted R-squared	0.84		
S.E. of regression	0.04		
F-statistic	30.27		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.01	1.07	0.30
DLOG(CDD)	0.81	12.98	0.00
DLOG(TIME)	-0.09	-1.93	0.06
DLOG(CRCCOMVAC)	-0.06	-1.82	0.08
DLOG-REALCRCCPG)	-0.04	-0.66	0.52
ECM_CRC48(-1)	-0.81	-4.55	0.00
R-squared	0.87		
Adjusted R-squared	0.84		
S.E. of regression	0.04		
F-statistic	36.81		0.000

Eastern Revenue Class 48 (Commercial)

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-4.03	-1.92	0.07
LOG(EDD)	0.70	5.62	0.00
LOG(TIME)	-0.27	-7.69	0.00
LOG(ONTGDP)	0.66	4.77	0.00
LOG-REALERCCPG)	-0.16	-4.14	0.00
DUM2008	0.13	4.86	0.00
R-squared	0.87		
Adjusted R-squared	0.85		
S.E. of regression	0.05		
F-statistic	38.71		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.01	1.28	0.21
DLOG(EDD)	0.70	8.04	0.00
DLOG(TIME)	-0.15	-2.62	0.01
DLOG-REALERCCPG)	-0.05	-0.86	0.40
ECM_ERC48(-1)	-0.72	-4.04	0.00
R-squared	0.75		
Adjusted R-squared	0.71		
S.E. of regression	0.04		
F-statistic	21.53		0.000

Niagara Revenue Class 48 (Commercial)

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-1.10	-0.55	0.59
LOG(NDD)	0.71	7.77	0.00
LOG(TIME)	-0.11	-3.37	0.00
LOG-REALNRCCPG)	-0.15	-3.33	0.00
LOG(ONTGDP)	0.40	2.98	0.01
DUM2009	0.05	1.62	0.12
R-squared	0.81		
Adjusted R-squared	0.78		
S.E. of regression	0.04		
F-statistic	24.59		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	0.00	0.31	0.76
DLOG(NDD)	0.75	10.77	0.00
DLOG-REALNRCCPG)	-0.07	-1.22	0.23
ECM_NRC48(-1)	-0.83	-4.19	0.00
R-squared	0.82		
Adjusted R-squared	0.81		
S.E. of regression	0.04		
F-statistic	46.90		0.000

RATE 6 REVENUE CLASS 73 REGRESSION EQUATIONS

Central Revenue Class 73 (Industrial)

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	1.20	0.43	0.67
LOG(CDD)	0.46	2.76	0.01
LOG(TIME)	-0.17	-3.75	0.00
LOG(ONTGDP)	0.50	2.86	0.01
DUM2008	0.54	13.88	0.00
R-squared	0.93		
Adjusted R-squared	0.92		
S.E. of regression	0.07		
F-statistic	102.29		0.000

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-0.03	-2.11	0.04
DLOG(CDD)	0.56	9.06	0.00
DLOG(ONTGDP)	0.72	2.15	0.04
DUM2008	0.25	6.21	0.00
DUM2009	-0.20	-5.17	0.00
ECM_CRC73(-1)	-0.66	-6.60	0.00
R-squared	0.85		
Adjusted R-squared	0.82		
S.E. of regression	0.04		
F-statistic	31.47		0.000

Eastern Revenue Class 73 (Industrial)

Single Equation Model

Variable	Coefficient	t-Statistic	p-Value
C	-181,360	-1.26	0.22
EDD	30	1.33	0.19
DUM2003	58,421	1.89	0.07
DUM2004	-166,654	-4.11	0.00
DUM2009	140,808	7.44	0.00
EASTEMP	384	1.63	0.11
TIME	-2,605	-1.39	0.18
R-squared	0.89		
Adjusted R-squared	0.87		
S.E. of regression	28,307.36		
F-statistic	38.66		0.000

Niagara Revenue Class 73 (Industrial)

Single Equation Model

Variable	Coefficient	t-Statistic	p-Value
C	-0.70	-0.20	0.84
LOG(NDD)	0.72	3.58	0.00
DUM2002	-0.37	-4.39	0.00
DUM2007	0.49	4.77	0.00
DUM2010	0.41	3.88	0.00
LOG(NIAGEMP)	1.21	2.33	0.03
AR(1)	0.72	4.71	0.00
R-squared	0.97		
Adjusted R-squared	0.97		
S.E. of regression	0.10		
F-statistic	162.36		0.000

Residential Rate 01 Regression Equations

Use Equation

Variable	Coefficient	t-Statistic	p-Value
HDD_JAN	0.49	80.76	0.00
HDD_FEB	0.45	65.66	0.00
HDD_MAR	0.43	57.13	0.00
HDD_APR	0.40	34.24	0.00
HDD_MAY	0.36	15.82	0.00
HDD_SEP	0.22	5.52	0.00
HDD_OCT	0.30	20.52	0.00
HDD_NOV	0.42	44.77	0.00
HDD_DEC	0.44	66.66	0.00
T_JUN	-63.57	-8.08	0.00
T_JUL	-72.15	-9.16	0.00
T_AUG	-77.33	-9.79	0.00
FEI_NS	-104.98	-10.38	0.00
PPH	50.07	20.39	0.00
AVGPR(-6)	-0.25	-4.11	0.00
DUM_JAN03	36.27	4.05	0.00
DUM_SEP01	31.86	3.55	0.00
DUM_JAN_MAY14	-26.40	-6.02	0.00
DUM_FEB16	-27.78	-3.17	0.00

R-squared 0.997
Adjusted R-squared 0.997
S.E. of regression 8.48

Vol Equation

Variable	Coefficient	t-Statistic	p-Value
HDD_JAN	136.91	75.45	0.00
HDD_FEB	124.68	61.64	0.00
HDD_MAR	123.11	52.76	0.00
HDD_APR	118.10	32.30	0.00
HDD_MAY	114.77	16.34	0.00
HDD_SEP	76.45	6.05	0.00
HDD_OCT	92.62	20.05	0.00
HDD_NOV	122.10	41.52	0.00
HDD_DEC	124.42	61.28	0.00
T_JUN	-106,372.40	-8.07	0.00
T_JUL	-108,606.60	-8.20	0.00
T_AUG	-109,881.50	-8.29	0.00
CUST	0.19	12.33	0.00
FEI_NS	-52,556.76	-8.87	0.00
PPH_S	27,379.52	7.72	0.00
AVGPR(-12)	-51.02	-2.39	0.02
DUM_SEP01	13,591.49	4.71	0.00
DUM_SEP03	7,582.06	2.75	0.01
DUM_SEP04	10,122.36	3.70	0.00
DUM_JAN04	-8,483.992	-3.028	0.003

R-squared 0.996
Adjusted R-squared 0.996
S.E. of regression 2,657.57

Residential Rate M1/M2 Regression Equations

Use Equation

Variable	Coefficient	t-Statistic	p-Value
HDD_JAN	1.43	39.47	0.00
HDD_FEB	1.40	38.36	0.00
HDD_MAR	1.39	37.89	0.00
HDD_APR	1.34	34.61	0.00
HDD_MAY	1.29	27.28	0.00
HDD_SEP	1.07	15.66	0.00
HDD_OCT	1.19	29.46	0.00
HDD_NOV	1.32	34.97	0.00
HDD_DEC	1.40	38.38	0.00
T_JUN	16.16	4.11	0.00
T_JUL	15.33	3.91	0.00
T_AUG	11.09	2.82	0.01
PPH	17.75	13.06	0.00
TBILL(-12)	-0.09	-4.08	0.00
EFF_FCTR	-1.03	-25.48	0.00
DUMMY_JAN00	-54.32	-6.07	0.00
DUMMY_FEB00	66.15	7.44	0.00
DUMMY_NOV00	-34.36	-3.87	0.00
DUMMY_NOV07	-35.74	-4.05	0.00

R-squared 0.997
Adjusted R-squared 0.996
S.E. of regression 8.54

Vol Equation

Variable	Coefficient	t-Statistic	p-Value
HDD_JAN	518.48	98.11	0.00
HDD_FEB	493.75	83.52	0.00
HDD_MAR	489.28	71.83	0.00
HDD_APR	451.98	40.04	0.00
HDD_MAY	421.89	17.36	0.00
HDD_SEP	242.99	4.75	0.00
HDD_OCT	311.30	20.72	0.00
HDD_NOV	429.90	47.04	0.00
HDD_DEC	501.41	80.45	0.00
T_JUN	-147,746.20	-3.99	0.00
T_JUL	-149,079.40	-4.02	0.00
T_AUG	-153,756.10	-4.15	0.00
CUST	0.11	8.00	0.00
FEI_NS	-79,784.09	-4.72	0.00
PPH_S	37,792.10	3.83	0.00
DUMMY_NOV07	-29,431.24	-3.72	0.00
DUMMY_NOV18	22,789.14	2.83	0.01
DUMMY_DEC01	-25,619.73	-3.24	0.00
DUMMY_APR12MAY12	-16,134.70	-2.90	0.00
DUMMY_DEC09JAN10	-23,724.44	-4.26	0.00

R-squared 0.997
Adjusted R-squared 0.997
S.E. of regression 7,636.07

Non-Residential Rate 01/10 Regression Equations

Commercial Use Equation

Variable	Coefficient	t-Statistic	p-Value
Intercept	222.97	3.91	0.00
Hdd_Jan	3.14	47.64	0.00
Hdd_Feb	3.06	40.42	0.00
Hdd_Mar	3.10	35.08	0.00
Hdd_Apr	2.74	20.03	0.00
Hdd_May	2.59	9.66	0.00
Hdd_Oct	2.43	13.69	0.00
Hdd_Nov	2.98	26.81	0.00
Hdd_Dec	3.02	39.29	0.00
T_Jun	212.95	3.55	0.00
T_Jul	171.34	2.86	0.00
T_Aug	151.68	2.53	0.01
T_Sep	241.45	4.03	0.00
Mkt_Chng	-55.02	-4.83	0.00

R-squared 0.994
Adjusted R-squared 0.993
S.E. of regression 81.08

Commercial Vol Equation

Variable	Coefficient	t-Statistic	p-Value
Hdd_Jan	86,657.09	103.93	0.00
Hdd_Feb	83,623.65	87.40	0.00
Hdd_Mar	82,696.04	75.62	0.00
Hdd_Apr	67,265.00	39.37	0.00
Hdd_May	49,929.40	14.87	0.00
Hdd_Sep	18,384.57	3.24	0.00
Hdd_Oct	55,464.83	25.31	0.00
Hdd_Nov	78,111.08	56.61	0.00
Hdd_Dec	81,503.56	85.78	0.00
C_01_10_Cust	742.09	14.96	0.00
C_01_10_Pr	-147,871.22	-7.13	0.00
ON_UnEmp_Rate	-826,174.43	-4.79	0.00

R-squared 0.997
Adjusted R-squared 0.992
S.E. of regression 2,652,145.51

Industrial Vol Equation

Variable	Coefficient	t-Statistic	p-Value
Hdd_Jan	9,647.32	35.34	0.00
Hdd_Feb	10,849.37	34.70	0.00
Hdd_Mar	10,091.58	28.24	0.00
Hdd_Apr	7,527.80	13.56	0.00
Hdd_May	6,318.53	5.80	0.00
Hdd_Sep	4,142.74	2.28	0.02
Hdd_Oct	8,202.03	11.49	0.00
Hdd_Nov	9,832.54	22.04	0.00
Hdd_Dec	10,303.79	33.42	0.00
I_10_LIB10_Cust	24,451.97	22.42	0.00
FX_US_Close	208,866.73	1.02	0.31
Jan_03	6,219,933.43	6.90	0.00
Feb_11	-2,974,712.77	-3.33	0.00

R-squared 0.992
Adjusted R-squared 0.987
S.E. of regression 869,131.08

Non Residential-Rate M1/M2 Regression Equations

Use Equation

Variable	Coefficient	t-Statistic	p-Value
Hdd_Jan	4.37	75.92	0.00
Hdd_Feb	4.51	64.27	0.00
Hdd_Mar	4.59	52.80	0.00
Hdd_Apr	4.35	28.87	0.00
Hdd_May	4.20	13.76	0.00
Hdd_Sep	2.94	5.48	0.00
Hdd_Oct	3.74	23.20	0.00
Hdd_Nov	4.61	48.61	0.00
Hdd_Dec	4.46	67.36	0.00
T_Jun	163.47	3.53	0.00
T_Jul	117.38	2.82	0.01
T_Aug	124.15	3.07	0.00
FX_US_Noon	326.30	12.69	0.00
Cl_OldM2_Tbill	-0.04	-1.32	0.19
After_2010	46.40	3.22	0.00
Mar_Apr_2000	-625.92	-7.75	0.00

R-squared 0.997
Adjusted R-squared 0.993
S.E. of regression 111.97

Vol Equation

Variable	Coefficient	t-Statistic	p-Value
Intercept	-99,505,428.75	-5.96	0.00
Hdd_Jan	353,996.16	101.86	0.00
Hdd_Feb	363,804.13	91.22	0.00
Hdd_Mar	368,570.92	80.89	0.00
Hdd_Apr	321,038.21	42.63	0.00
Hdd_May	272,538.50	16.91	0.00
Hdd_Sep	126,155.78	3.71	0.00
Hdd_Oct	277,701.18	27.87	0.00
Hdd_Nov	368,917.21	63.04	0.00
Hdd_Dec	362,078.38	88.81	0.00
Cl_OldM2_Cust	1,563.42	9.74	0.00
Cl_OldM2_Pr Lag 3	-170,136.62	-2.33	0.02
FX_US_Noon Lag 12	13,907,750.94	3.55	0.00

R-squared 0.989
Adjusted R-squared 0.989
S.E. of regression 10,397,487.23

Tobacco M1 Vol Equation

Variable	Coefficient	t-Statistic	p-Value
Intercept	-33,826.13	-0.67	0.50
JAN	0.55	5.11	0.00
FEB	0.48	3.94	0.00
MAR	0.51	3.62	0.00
APR	0.45	7.40	0.00
MAY	0.48	2.57	0.01
JUN	0.31	0.33	0.75
JUL	0.54	1.76	0.08
AUG	0.48	8.38	0.00
SEP	0.57	38.75	0.00
OCT	0.58	29.79	0.00
NOV	0.48	12.48	0.00
DEC	0.47	22.31	0.00
SO	696,932.15	5.93	0.00
N	-1,108,838.85	-9.34	0.00

R-squared 0.982
Adjusted R-squared 0.979
S.E. of regression 225,513.74

Tobacco Total Vol Equation

Variable	Coefficient	t-Statistic	p-Value
JAN	68.51	0.17	0.87
FEB	1,005.36	2.49	0.01
MAR	872.50	2.16	0.03
APR	2,100.36	5.19	0.00
MAY	645.10	1.59	0.11
JUN	61.22	0.15	0.88
JUL	382.06	0.94	0.35
AUG	2,288.78	5.60	0.00
SEP	12,050.57	29.44	0.00
OCT	10,555.42	21.04	0.00
NOV	-6,226.61	-13.23	0.00
DEC	1,642.74	3.49	0.00
OND	4,380,549.63	12.99	0.00
2014/16	185,928.23	1.10	0.27
2015/17	289,550.08	1.70	0.09

R-squared 0.951
Adjusted R-squared 0.930
S.E. of regression 824,154.34

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

INTERROGATORY

Question:

Rate Zone Demand Forecasts

Enbridge Gas has provided on pages 21-22 the annual demand forecast for each rate zone in Table 1. OEB staff developed the following table that compares the annual demand provided in the 5-year gas supply plan (EB-2019-0137) and the annual update. In your presentation, please discuss the following:

- a) Please confirm that the variance analysis provided in Table 1 is accurate. If not, please provide a revised table.
- b) Please explain the significant increase in the forecasted demand in the Union North West contract market from 2022/23 onwards. The increase in the contract market demand from 2021/22 to 2022/23 is 124% and further increases in 2023/24. This increase is observed even when compared to the previous 5-year GSP as noted from Table 1 below.
- c) Please explain the significant decline in demand for the Union North East contract market for the planning period 2022/23 and 2023/24 as compared to the information provided in the previous 5-year GSP (EB-2019-0137).

Table 1 – Annual Demand Forecast (TJ)

	2020/2021			2021/2022			2022/2023			2023/2024		
	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance
EGD												
General Service	384,233	388,193	3,960	384,182	390,299	6,117	384,703	392,361	7,658	385,403	395,340	9,937
Contract	73,227	70,625	-2,602	72,789	70,148	-2,641	72,353	69,784	-2,569	71,917	69,513	-2,404
Total EGD	457,460	458,818	1,358	456,971	460,447	3,476	457,056	462,145	5,089	457,320	464,853	7,533
Union North West												
General Service	13,886	14,335	449	13,814	14,470	656	13,742	14,484	742	13,741	14,601	860
Contract	1,330	1,636	306	1,372	1,683	311	1,363	3,767	2,404	1,355	4,803	3,448
Total Union North West	15,216	15,971	755	15,186	16,153	967	15,105	18,251	3,146	15,096	19,404	4,308
Union North East												
General Service	35,967	38,290	2,323	35,765	38,646	2,881	35,558	38,671	3,113	35,533	38,961	3,428
Contract	3,683	3,763	80	3,955	3,878	-77	5,198	3,884	-1,314	5,305	3,871	-1,434
Total Union North East	39,650	42,053	2,403	39,720	42,524	2,804	40,756	42,555	1,799	40,838	42,832	1,994
Union South												
General Service	163,321	175,431	12,110	162,482	175,430	12,948	161,632	175,133	13,501	161,596	175,944	14,348
Contract	51,720	54,127	2,407	52,144	56,738	4,594	52,436	57,587	5,151	52,659	55,609	2,950
Total Union South	215,041	229,558	14,517	214,626	232,168	17,542	214,068	232,720	18,652	214,255	231,553	17,298
Total Demand Forecast	727,367	746,400	19,033	726,503	751,292	24,789	726,985	755,671	28,686	727,509	758,642	31,133

Response:

- Confirmed, with the caveat that EGD's annual demand in the 5-year gas supply plan was presented on a calendar-year basis and included 'other volumes' such as Gazifere, UAF, unbilled, company-use). The tables in the 2020 and 2021 Annual Updates were adjusted to reflect gas-year volumes and excluded other volumes, consistent with the Union rate zone tables.
- Addressed in the Stakeholder Day presentation.
- Addressed in the Stakeholder Day presentation.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

INTERROGATORY

Questions:

Rate Zone Supply Sources

Enbridge Gas has provided on pages 15-24 the supply sources assumed in Enbridge Gas's GSP for sales service customers in Table 3. OEB staff developed the following table that compares the supply sources provided in the 5-year GSP and the annual update. In your presentation, please discuss the following:

Sources of Supply

	2020/2021			2021/2022			2022/2023			2023/2024		
	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance	5-Yr Plan	Update	Variance
EGD												
Appalachia	42,361	43,117	756	42,361	43,117	756	42,361	43,117	756	42,477	43,235	758
Chicago	24,994	25,194	200	24,994	25,194	200	24,994	25,194	200	25,062	25,263	201
Niagara Region	72,979	73,355	376	72,979	73,355	376	72,979	73,355	376	73,179	73,556	377
Ontario / Dawn	90,593	101,670	11,077	90,905	103,295	12,390	91,170	104,449	13,279	91,179	105,214	14,035
Peaking / Seasonal	131	82	-49	26	18	-8	45	31	-14	64	48	-16
WCSB	76,701	90,562	13,861	76,807	90,596	13,789	76,472	90,622	14,150	77,141	90,884	13,743
Total EGD	307,759	333,980	26,221	308,072	335,575	27,503	308,021	336,768	28,747	309,102	338,200	29,098
Union North West												
WCSB	13,038	16,314	3,276	12,348	17,914	5,566	11,089	17,596	6,507	11,291	18,812	7,521
Union North East												
Appalachia	19,255	19,255	0	19,255	19,255	0	19,255	19,255	0	19,308	19,308	0
Ontario / Dawn	9,152	11,867	2,715	9,788	11,233	1,445	10,551	13,335	2,784	10,246	10,757	511
WCSB	1,364	1,364	0	1,364	1,493	129	1,364	1,493	129	1,368	1,359	-9
Total Union North East	29,771	32,486	2,715	30,407	31,981	1,574	31,170	34,083	2,913	30,922	31,424	502
Union South												
Appalachia	38,510	38,510	0	38,510	38,510	0	38,510	38,509	-1	38,615	38,615	0
Chicago	30,807	30,807	0	30,807	30,807	0	30,807	30,807	0	30,892	30,892	0
Niagara Region	7,702	7,702	0	7,702	7,702	0	7,702	7,702	0	7,723	7,723	0
Ontario / Dawn	42,852	43,992	1,140	42,170	46,382	4,212	42,386	46,504	4,118	41,148	45,200	4,052
US Mid-Continent	21,950	21,950	0	21,950	21,950	0	21,950	21,950	0	22,011	22,011	0
WCSB	1,095	8,797	7,702	1,095	8,797	7,702	1,095	8,797	7,702	1,098	8,821	7,723
Local Producers	452	0	-452	452	0	-452	452	0	-452	453	0	-453
Total Union South	143,368	151,758	8,390	142,686	154,148	11,462	142,902	154,269	11,367	141,940	153,262	11,322
Total Supply Forecast	493,936	534,538	40,602	493,513	539,618	46,105	493,182	542,716	49,534	493,255	541,698	48,443

- a) Please confirm that the variance analysis provided in Table 3 is accurate. If not, please provide a revised table.
- b) In the 5-year GSP (EB-2019-0137), one of the supply sources included local production. Please confirm if the company does not intend to source local production going forward or if local production is included in the other supply sources. If the company intends to stop procuring local supplies, please provide reasons.
- c) Please explain the proposed increase in sourcing gas from WCSB (Western Canadian Sedimentary Basin) for the EGD and Union rate zones in the current update as compared to the information provided in the previous 5-year GSP (EB-2019-0137).
- d) Will the increased purchases from the WCSB be transported using TC Energy's long-haul firm transportation capacity (FT)? If yes, please explain how the proposed approach aligns with Enbridge Gas's view that FT on the TC Energy Canadian Mainline has not been consistently available due to an increase in FT contracting.

Response:

- a) Confirmed.
- b) Addressed in the Stakeholder Day presentation.
- c) Addressed in the Stakeholder Day presentation.
- d) Addressed in the Stakeholder Day presentation.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC) / Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Reference:

EGI 2021 Gas Plan, pages 21-22

Questions:

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

Response:

Please refer to the tables below for the requested amendments to Table 1 and Table 2.

Table 1 – Annual Demand Forecast

Line No.	Particulars (TJ)	Actuals		EB-2021-0004				
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>EGD</u>							
1	General Service	394,777	413,685	388,193	390,299	392,361	395,340	396,176
2	Contract	68,241	67,770	70,625	70,148	69,784	69,513	68,861
3	Total EGD	463,018	481,456	458,819	460,448	462,145	464,853	465,037
	<u>Union North West</u>							
4	General Service	14,765	14,994	14,335	14,470	14,484	14,601	14,579
5	Contract	2,861	2,172	1,636	1,683	3,767	4,803	4,798
6	Total Union North West	17,626	17,165	15,971	16,153	18,252	19,404	19,377
	<u>Union North East</u>							
7	General Service	38,849	40,199	38,290	38,646	38,671	38,961	38,892
8	Contract	4,019	4,003	3,763	3,878	3,884	3,871	3,858
9	Total Union North East	42,868	44,203	42,053	42,524	42,555	42,832	42,750
	<u>Union South</u>							
10	General Service	176,087	180,218	175,431	175,430	175,133	175,944	175,170
11	Contract	51,808	53,593	54,127	56,738	57,587	55,609	54,407
12	Total Union South	227,895	233,811	229,558	232,168	232,720	231,553	229,577
13	Total Demand Forecast	751,407	776,634	746,401	751,292	755,671	758,642	756,741

Table 2 – Design Day Demand Forecast

Line No.	Particulars (TJ/d)	EB-2018-0305	EB-2019-0137	EB-2021-0004				
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
1	EGD	4,007	4,028	4,022	4,040	4,057	4,074	4,090
2	Union North West	129	130	128	128	128	128	127
3	Union North East	401	403	398	404	406	410	409
4	Union South	3,053	3,108	3,118	3,269	3,325	3,351	3,540

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC) / Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Reference:

EGI 2021 Gas Plan, Table 6, page 36

Questions:

Table 6 - EGD Rate Zone Design Day Position

		EGD CDA					EGD EDA				
Line No.	Particulars (TJ/d)	2020/21	2021/22	2022/23	2023/24	2024/25	2020/21	2021/22	2022/23	2023/24	2024/25
<u>Demand</u>											
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
<u>Supply Asset</u>											
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?

Response:

a) Please refer to the table below for the requested amendment.

Table 6 – EGD Rate Zone Design Day Position

Line No.	Particulars (TJ/d)	EGD CDA							EGD EDA						
		EB-2018-0305	EB-2019-0137	EB-2021-0004				EB-2018-0305	EB-2019-0137	EB-2021-0004					
		2018/19	2019/2020	2020/21	2021/22	2022/23	2023/24	2024/25	2018/19	2019/2020	2020/21	2021/22	2022/23	2023/24	2024/25
Demand															
1	Gross Demand	3,401	3,414	3,400	3,412	3,425	3,437	3,448	715	723	719	724	729	734	738
2	Curtailment	(79)	(79)	(71)	(71)	(71)	(71)	(71)	(30)	(30)	(26)	(26)	(26)	(26)	(26)
3	Net Demand	3,322	3,335	3,329	3,341	3,354	3,366	3,377	685	693	693	698	703	708	713
Supply Asset															
4	TCPL Long-haul	75	5	5	5	5	5	5	190	260	260	260	260	260	260
5	TCPL Short-haul	523	668	668	773	768	768	768	407	337	337	358	362	362	362
6	TCPL STS	284	284	284	284	284	284	284	81	81	81	81	81	81	81
7	EGI D-P	2,194	2,194	2,194	2,194	2,194	2,194	2,194	-	-	-	-	-	-	-
8	In-Franchise Supply	88	88	72	72	72	72	72	-	-	0	0	0	0	0
9	Third-Party Services	158	40	40	-	-	-	-	7	-	-	-	-	-	-
10	Total Supply	3,322	3,279	3,263	3,328	3,323	3,323	3,323	685	678	678	698	703	703	703
11	Excess(Shortfall)	-	(56)	(66)	(14)	(31)	(42)	(54)	-	(15)	(16)	-	(1)	(5)	(10)
12	Shortfall % of Net Demand	0.0%	1.7%	2.0%	0.4%	0.9%	1.3%	1.6%	0.0%	2.2%	2.2%	0.0%	0.1%	0.7%	1.4%

b) Addressed in Stakeholder Day presentation.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC) / Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Reference:

EGI 2021 Gas Plan, Table 14, page 42

Questions:

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.

Response:

Enbridge Gas has assumed that this question is requesting that Table 14 be amended to include the historical years 2019/2020 and 2018/2019. Please refer to the table below for the requested amendment.

Table 14 – Union South Rate Zone Design Day Position

Line No.	Particulars (TJ/d)	EB-2018-0305	EB-2019-0137	EB-2021-0004				
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>Demand</u>							
1	Union South	3,053	3,108	3,118	3,269	3,325	3,351	3,540
	<u>Supply Asset</u>							
2	Great Lakes	0	0	21	21	21	21	21
3	Nexus	106	106	106	106	106	106	106
4	Non-obligated (e.g. Power Plants)	270	270	254	254	273	273	273
5	Ontario Dawn	542	548	520	560	566	566	569
6	Ontario Parkway	219	225	227	240	242	242	240
7	Panhandle	58	60	60	60	60	60	60
8	Storage	1,750	1,790	1,822	1,920	1,949	1,975	2,162
9	TCPL Long-Haul	3	3	3	3	3	3	3
10	TCPL Niagara	21	21	21	21	21	21	21
11	Vector	84	84	84	84	84	84	84
12	Total Supply	3,053	3,108	3,118	3,269	3,325	3,351	3,540
13	Excess(Shortfall)	-	-	-	-	-	-	-

* includes Sales Service, Bundled DP, T-Service

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Reference:

Page 13, figure 3

Questions:

- a) Please file a copy of all of Enbridge's long-range gas demand and gas consumption forecasts. Please include Enbridge's 20-year forecast.
- b) Please provide a table with the numbers underlying figure 3. Please also provide those figures in m3 instead of PJ.
- c) Please provide a table comparing Enbridge's gas demand and consumption forecasts with the one in figure 3.

Response:

- a) and c) Enbridge Gas declines to answer this question, as the information requested is beyond the scope of this Annual Update proceeding.
- b) The following information is the underlying data for the ICF Regional Natural Gas Consumption forecast from their Q4 Strategic Forecast, corresponding to the information found in Figure 3 on page 13 of EGI's Annual Update. Note the data below represents annual demand. 1 Bcf of natural gas is equivalent to 28,330 10³m³.

ICF Q4 2020
Section 2: Regional Natural Gas Consumption (Bcf)



	2017	2018	2019	2020	2021	2025	2030	2035	2040	2045	2017-2045 Change	Annual %Change
Ontario												
Total Consumption	861	994	975	890	1,032	1,157	1,170	1,198	1,299	1,339	478	1.59%
Residential	308	365	306	305	396	387	392	399	404	414	105	1.06%
Commercial	220	260	303	245	241	244	255	273	293	317	97	1.31%
Industrial	276	282	280	250	259	262	262	260	262	267	-8	-0.11%
Power Generation	42	68	68	74	120	247	245	249	323	322	280	7.54%
Pipeline Fuel	15	18	18	15	15	17	16	16	18	19	4	0.88%
Lease & Plant	0	0	0	0	0	0	0	0	0	0	0	-6.40%

Source: ICF Q4 2020 Strategic, used with permission

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Reference:

Page 8

“Gas Supply plays a major role in planning and execution of the gas supply plan for the utility, with expenditures of more than \$2 billion annually.”

Questions:

- a) Please provide the total historical and forecast cast supply costs for the past five and future five years.
- b) Please provide the historical and forecast annual average price per m3 paid by Enbridge for the past five and future five years.
- c) If Ontario gas demand were to decline by 10%, what percentage impact would that have on the price of gas in Ontario? (The impact will be very small in percentage terms, but can be calculated.) Please provide an answer on a best efforts basis.

Response:

- a) and b) Please see the Attachment to this response.
- c) Enbridge Gas declines to answer this question, as the hypothetical question posed is beyond the scope of this Annual Update proceeding.

Gas Year	Actual					Forecast ¹				
	<u>15/16</u>	<u>16/17</u>	<u>17/18</u>	<u>18/19</u>	<u>19/20</u>	<u>20/21</u>	<u>21/22</u>	<u>22/23</u>	<u>23/24</u>	<u>24/25</u>
Total Gas Supply Cost (\$B CAD)	\$ 1.78	\$ 2.21	\$ 2.27	\$ 2.42	\$ 1.71	\$ 2.06	\$ 2.11	\$ 2.15	\$ 2.19	\$ 2.21
Total Gas Supply Cost (\$CAD/m3)	\$ 0.1611	\$ 0.1810	\$ 0.1644	\$ 0.1668	\$ 0.1318	\$ 0.1400	\$ 0.1433	\$ 0.1460	\$ 0.1491	\$ 0.1510

1) Forecast Total Gas Supply Cost is based on the 2020/2021 Gas Supply Plan. Gas commodity prices are derived from a 21 day strip of forecast prices ending February 28, 2020. Transportation tolls and fuel ratios represent those in effect in February 2020.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario (FRPO)

Interrogatory

Reference:

Update pg. 21

Preamble:

EGI evidence states: *“Table 1 below illustrates the annual demand forecast for each rate zone. Overall, the current forecast is showing higher demand compared to the 2020 Annual Update as a result of updated driver variables, recent actual consumption trends, and known and forecasted customer and contracted demand growth.”*

Questions:

We would like to understand better the drivers and trends that contribute to the forecasted increases in Table 1.

In an Excel file, for each month that contributed to the demand forecast, for each rate zone (i.e., EGD, UG South, UG Northwest, UG Northeast), please provide:

- a) The actual monthly consumption
- b) The monthly heating degree days
- c) The weather normalized consumption

Response:

a) – c)

The referenced table shows the forecast annual demand (consumption) for each year from 2020/21 to 2024/25. There is no “actual” consumption for those years included in the Update. The forecast heating degree days that are used in the annual demand (consumption) forecasts are held constant for each year, using the 2020/21 forecast for each weather zone.

Enbridge Gas does not believe that it is relevant or necessary for the purpose of this Annual Update process to provide monthly breakdowns of demand forecasts or degree days and declines to provide that information.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario (FRPO)

Interrogatory

Reference:

Update pg. 35, Table 6, pg. 36 and Table 7 pg. 37

Preamble:

EGI evidence states: *“Finally, EGI’s evaluation of the costs of a potential supply option is mainly a quantitative exercise. If the option is intended to satisfy average day needs, EGI will evaluate based on landed costs (i.e. \$/GJ/d). If the option is intended to meet design day needs, annual costs (i.e. \$/GJ/yr) are calculated.”*

Questions:

We would like to understand the potential benefits of peaking services in meeting demand.

Please provide the specific location (receipt and delivery points of contract, e.g., CDA Vic Square, etc.) of peaking services obtained by EGI (or EGD or UG) in the last 5 years?

- a) Please provide the historic annual cost (\$/GJ/yr.)
- b) Table 6 shows the peaking service ceasing in 2021/22. What is the plan to replace that service?
- c) The footnote 56 provides a “temporary phenomenon”. Please describe the phenomenon and what will alleviate that condition.

Response:

- a) Peaking services are supply arrangements that procure gas from third-party suppliers for delivery directly to EGI’s franchise areas. These supply arrangements are callable at EGI’s discretion. Pricing for these services typically contain a fixed demand charge component as well as a variable commodity charge applied to any

supply that is called on by EGI. In the past 5 years, EGI has purchased peaking services for delivery to the Enbridge CDA and the Enbridge EDA.

The historic costs of peaking services vary depending primarily upon whether supplies were called by EGI during the term of the agreement. The table below shows the annual cost of peaking services, the maximum daily volume contracted, and the total volume called upon during each of the past 5 years.

Gas Year	Max Daily Volume (GJ)	Total volume called (GJ/year)	Annual Cost (\$Millions CAD)
2015/16	122,913	272,205	\$6,106,931
2016/17	80,184	50,115	\$1,066,203
2017/18	43,258	216,287	\$4,768,277
2018/19	155,000	1,012,262	\$8,632,216
2019/20	55,000	0	\$227,265

- b) Addressed in Stakeholder Day presentation.
- c) Addressed in Stakeholder Day presentation.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario (FRPO)

Interrogatory

Reference:

EB-2019-0137 EGI 5 YR Gas Supply Plan, page 53, Table 16

Preamble:

We would like to understand better the determination of the landed costs and their impact on customer bills.

Question:

Please provide the path including the individual segments

- a) Please provide each segment's contribution to the total costs.

Please show the calculation that determines that there is less than one percent difference between the current portfolio and the Nexus path.

Response:

- a) EGI believes that this question is actually referencing Table 17 on page 45. The landed cost analysis depicts the landed cost per GJ for potential incremental purchases for various paths. Table 15 on page 43 shows that the Union Rate zone has Average Day growth from 2020 to 2024 of 7 TJ/d.

The Average Cost/Customer Impact – Relative to Status Quo column indicates that purchasing a volume of 7 TJ/d of additional NEXUS capacity would increase Union South bills by less than 1% for a Union South customer.

Please see the Attachment to this response for a detailed breakdown of the landed cost shown in Table 17, page 45 of EGI's Annual Update.

Dawn Deliveries
2019-2029 Transportation Contracting Analysis

Option	Point of Supply	Basis Differential \$/US/mmBtu (C)	Supply Cost \$/US/mmBtu (D) = Nymex + C	Unitized Demand Charge \$/US/mmBtu (E)	Demand Charge Segment A \$/US/mmBtu	Demand Charge Segment B \$/US/mmBtu	Demand Charge Segment C \$/US/mmBtu	Commodity Charge \$/US/mmBtu (F)	Fuel Charge \$/US/mmBtu (G)	100% LF Transportation Inclusive of Fuel \$/US/mmBtu (I) = E + F + G	Landed Cost \$/US/mmBtu (J) = D + I	Landed Cost \$/Cdn/G (K)	Point of Delivery (L)	Comments
Dawn	Dawn	0.067	3.401							0.000	3.401	4.285	Dawn	
TC: Dawn LTFF	Empress	-0.673	2.660	0.611	0.611			0.000	0.093	0.704	3.364	4.239	Union SWDA	
TC: Great Lakes to Dawn	Empress	-0.673	2.660	0.659	0.378	0.269	0.012	0.011	0.093	0.763	3.423	4.313	Dawn	Segment A Empress to Emerson II/Segment B - Emerson to St. Clair / Segment C St. Clair to Dawn
TC: Niagara to Dawn	Niagara	-0.092	3.242	0.153	0.113	0.039		0.002	0.019	0.173	3.415	4.303	Dawn	Segment A - Niagara to Kirkwall/ Segment B Kirkwall to Dawn
MichCon: MichCon to Dawn	SE Michigan	-0.040	3.293	0.159	0.090	0.069		0.002	0.041	0.202	3.495	4.403	Dawn	Segment A - Michcon to St.Clair/ Segment St.Clair to Dawn
Vector: Chicago to Dawn	Chicago	-0.070	3.264	0.181	0.180			0.002	0.014	0.196	3.460	4.360	Dawn	
Panhandle: Panhandle FZ to Dawn	Panhandle Field Zone	-0.296	3.038	0.750	0.681	0.069		0.057	0.156	0.963	4.001	5.041	Dawn	Segment A - PEPL FZ to Ojibway / Segment B - Ojibway to Dawn
NEXUS via St. Clair: Kensington to Dawn	Dominion South Point	-0.872	2.461	0.936	0.867	0.069		0.002	0.062	1.000	3.462	4.362	Dawn	Segment A - Kensington to St. Clair / Segment B - St. Clair to Dawn
Rover: Rover FZ to Dawn	Dominion South Point	-0.872	2.461	0.984	0.984			0.045	0.062	1.092	3.553	4.477	Dawn	

Supply Assumptions used in Developing Transportation Contracting Analysis:

Annual Gas Supply & Fuel Ratio Forecasts	Point of Supply Col (B) above	Nov 2020 - Oct 2021	Nov 2021 - Oct 2022	Nov 2022 - Oct 2023	Nov 2023 - Oct 2024	Nov 2024 - Oct 2025	Nov 2025 - Oct 2026	Nov 2026 - Oct 2027	Nov 2027 - Oct 2028	Nov 2028 - Oct 2029	Nov 2029 - Oct 2030	Average Annual Gas Supply Cost \$/US/mmBtu Col (D) above	Fuel Ratio Forecasts Col (G) above
Henry Hub	Henry Hub	3.2194	3.0081	2.6007	3.1526	3.3314	3.2447	3.4706	3.6535	3.6967	3.9588	3.334	
Dawn	Dawn	3.2324	3.0730	2.6115	3.2203	3.4267	3.3072	3.5747	3.7573	3.7662	4.0369	3.401	
TC: Dawn LTFF	Empress	2.5820	2.4430	2.0064	2.6354	2.8369	2.7052	2.6849	2.8450	2.8387	3.0243	2.660	0.03497
TC: Great Lakes to Dawn	Empress	2.5820	2.4430	2.0064	2.6354	2.8369	2.7052	2.6849	2.8450	2.8387	3.0243	2.660	0.02933
TC: Niagara to Dawn	Niagara	3.1160	2.9528	2.4869	3.0573	3.2110	3.1015	3.3411	3.4828	3.5307	4.1401	3.242	0.00584
MichCon: MichCon to Dawn	SE Michigan	3.1263	2.9676	2.5169	3.1150	3.3202	3.2018	3.4642	3.6447	3.6543	3.9221	3.293	0.01241
Vector: Chicago to Dawn	Chicago	3.1083	2.9536	2.5050	3.0984	3.3086	3.1906	3.4225	3.5921	3.6016	3.8602	3.264	0.00418
Panhandle: Panhandle FZ to Dawn	Panhandle Field Zone	2.9071	2.7370	2.3344	2.8983	3.0685	2.9697	3.1863	3.3336	3.3474	3.5977	3.038	0.05127
NEXUS via St. Clair: Kensington to Dawn	Dominion South Point	2.6575	2.4676	1.9860	2.4506	2.4109	2.2704	2.4557	2.4855	2.5548	2.8759	2.461	0.02531
Rover: Rover FZ to Dawn	Dominion South Point	2.6575	2.4676	1.9860	2.4506	2.4109	2.2704	2.4557	2.4855	2.5548	2.8759	2.461	0.00610

Sources for Assumptions:

Gas Supply Prices (Col D): ICF Q4 2019 Base Case

Fuel Ratios (Col G): Average ratio over the previous 12 months or Pipeline Forecast

Transportation Tolls (Cols E & F): Tolls in effect on Alternative Routes at the time of Union's Analysis

Foreign Exchange (Col K) \$1 US = 1.3293 CDN From Bank of Canada Closing Rate September 21, 2020

Energy Conversions (Col K) 1 dth = 1 mmBtu = 1.055056 1.259933122

EGI's Analysis Completed: 43802

Paths included in analysis are those with comparable services available for contracting, as well as relevant benchmarks and currently contracted paths.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Reference:

Section 3 – Integration

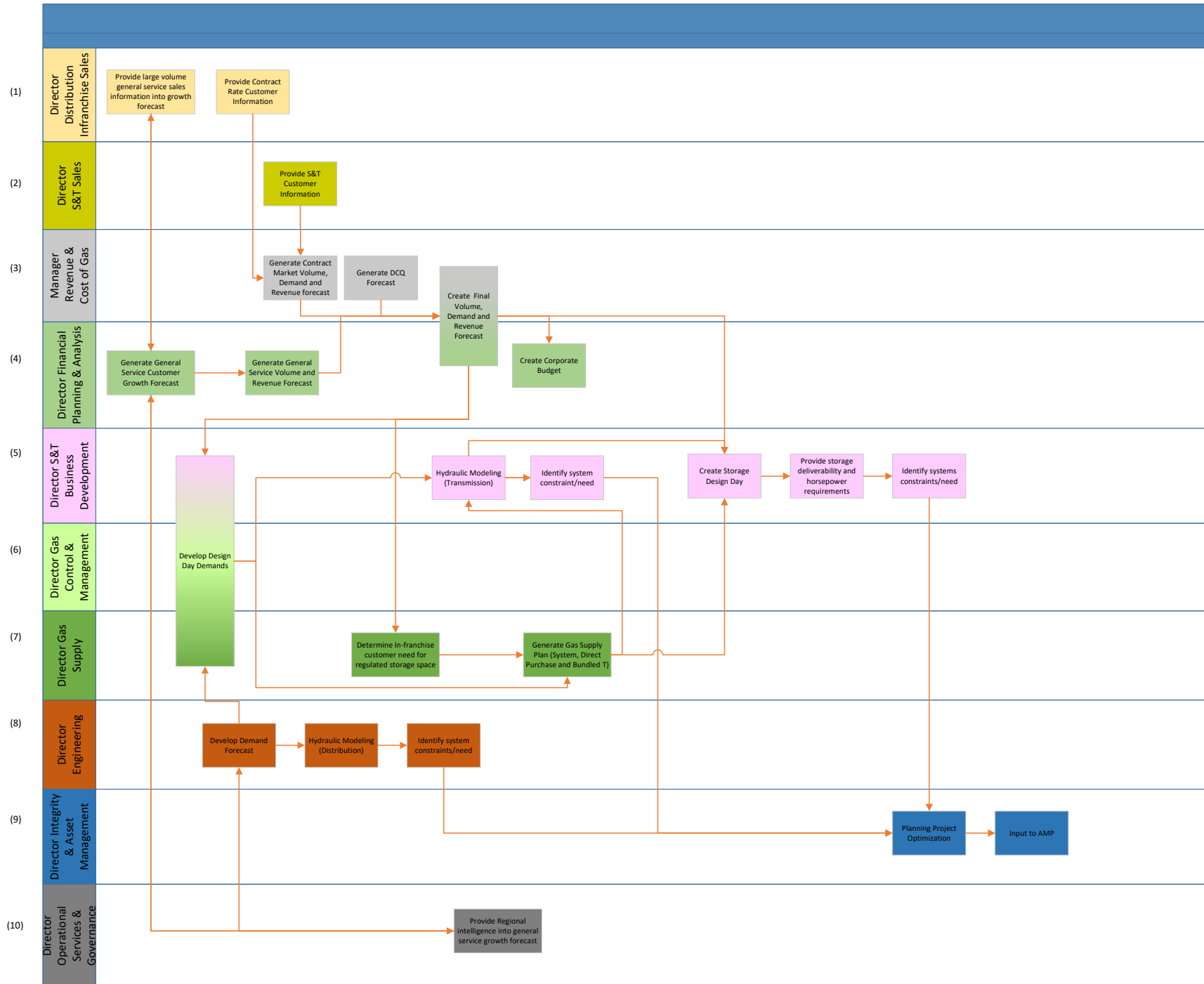
“The gas supply planning process is an integrated process that begins months in advance of the upcoming gas year with multiple teams executing on numerous internal processes.”

Question:

- a) Please provide a process diagram and timeline showing the gas supply planning process and how it integrates with other related processes.

Response:

Please see EB-2020-0091, Exhibit J1.8, Attachment 2. For ease of reference this undertaking is attached to this response. Pages 7 to 8 of the 5 Year Gas Supply Plan filed in the EB-2019-0137 proceeding also contains a discussion of the gas supply planning process.



ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Reference:

Section 6.3 Sustainable Natural Gas

Questions:

- a) With Enbridge being a gas distributor rather than a natural gas producer, please explain how Equitable Origins EO100TM Certification (or equivalent) would relate to Enbridge and gas customers in Ontario.
- b) Is the Gas Supply team the Enbridge lead on assessing Sustainable Natural Gas. If not, please explain who the lead department is and how Gas Supply supports that department on SNG.
- c) Please explain whether there is a cost to purchase natural gas that is certified sustainable and how that would be the same/different from Enbridge's pilot RNG program.
- d) Please explain the difference between Energir's RNG (renewable natural gas) targets (in alignment to exceed Provincial requirement – reference: [R-6.01, r. 4.3 - Regulation respecting the quantity of renewable natural gas to be delivered by a distributor \(gouv.qc.ca\)](#)) and the SNG (sustainable natural gas) target of 20% Enbridge references on page 26 of its evidence.
- e) The web reference for footnote 46 on page 26 does not appear to work. Please file a copy of the webpage contents.

Response:

- a) Addressed in Stakeholder Day presentation.
- b) Addressed in Stakeholder Day presentation.

- c) Addressed in Stakeholder Day presentation.
- d) Addressed in Stakeholder Day presentation.
- e) Please see the Attachment to this response for the requested information.



February 10, 2020 - Press releases

Calgary, February 10, 2020 – Seven Generations Energy Ltd. (7G) and Québec’s main natural gas distributor, Énergir s.e.c. (Énergir), have entered into a responsible natural gas supply agreement governed by the EO100™ Standard for Responsible Energy Development. Globally, this is the first transaction executed under the EO100™ framework and establishes a new standard for transparency across the value chain.

Developed by Énergir as a means to provide a better understanding of the product it purchases and distributes in order to ultimately reduce its footprint, this responsible procurement of natural gas initiative aims to promote business partnerships with proactive and responsible natural gas producers. This partnership represents a commitment to increased transparency through the public disclosure of relevant operational information and demonstrates leadership in implementing environmental, social and governance (ESG) best practices. Ultimately, the use of these best practices will help to reduce the environmental impact involved in natural gas development. Énergir aims to have approximately 20% of its system gas purchases dedicated to this initiative in the first year.

7G’s commitment to responsible energy development has been recognized through the EO100™ certification. The EO100™ Standard was developed according to the stringent requirements of the ISEAL Alliance, a global association that consolidates several leading sustainability standards, including those developed by the Forest Stewardship Council (FSC) and the Marine Stewardship Council (MSC). The certification was granted by Equitable Origin following a comprehensive and independent assurance process that verified 7G’s ESG performance through site-level assessments and discussions with key stakeholders, and ultimately recognizes 7G’s commitment to continuous improvement of its sustainable development practices.

The Pembina Institute, Canada’s leading clean energy think-tank, played a critical role as an advisor on more responsible production and procurement practices throughout this process. Working with Énergir, Pembina’s energy policy experts identified potential certification frameworks, engaged Énergir’s stakeholders to identify their concerns, recommended the Equitable Origin standard and observed the certification process as a third-party. Pembina also provided recommendations and counsel to Énergir on its initiative for the responsible procurement of natural gas.

This agreement, and accompanying natural gas supply transaction, is the result of extensive collaboration between four parties with diverse perspectives and a shared vision to address the concerns of their stakeholders. The initiative is intended to help foster further discussions with various stakeholder groups about the role of responsibly developed

Leadership quotes from partner companies

In recognition of today's announcement, leaders from each of the companies involved in the process had the following comments:

"Stakeholder service, responsible development and diverse market access are core to our strategy. The collaboration across multiple stakeholder groups and Indigenous communities that led to the Equitable Origin certification and the Énergir responsible natural gas supply transaction, marks a milestone for 7G. This transaction will help fund and catalyze our newly created 7G Sustainability Fund that will support additional, innovative sustainability projects aimed at reducing our environmental footprint, broadening our Indigenous partnerships and supporting our responsible development. We would like to thank our partners – Énergir, Equitable Origin and the Pembina Institute – who's leadership and collaborative efforts have resulted in a forward-thinking approach. This certification and transaction demonstrates our ability to respond to the interests of our stakeholders and paves the way for future opportunities to deliver responsibly developed energy to like-minded companies and customers."

Marty Proctor, President and Chief Executive Officer, Seven Generations Energy

"The realization of this initiative, thanks to this first transaction and the collaboration that led to it, allows us to better address the concerns of our stakeholders and customers that wish to participate in the energy transition. It is a step in the right direction, allowing us to have a better understanding of the impacts of our activities that fits our mission to provide increasingly sustainable ways to meet the energy needs of our customers and the communities we serve. Énergir is committed to actively contribute to the fight against climate change by decarbonizing our activities through numerous actions like promoting energy efficiency, injecting more renewable natural gas in our system. This initiative is aligned with this commitment."

Stéphanie Trudeau, Executive Vice-President Quebec, Énergir

"Equitable Origin is delighted to award Seven Generations the first certification of a natural gas producer to the EO100™ Standard for Responsible Energy Development. Seven Generations is a pioneer in their industry for having demonstrated through independent verification that they are not only meeting the stringent requirements of the EO100™ Standard, but also going above and beyond in many areas of social and environmental performance."

Soledad Mills, Chief Executive Officer, Equitable Origin

"Canadians are increasingly concerned about the impacts of natural gas production on our climate, water, air, and communities, including Indigenous Peoples. As well, we know the world needs to transition to less carbon-intensive sources of energy. For Canada to achieve its climate targets for 2050, demand will increase for cleaner sources of energy and will decrease for more carbon intensive sources. We support the producers that achieve better upstream environmental and climate outcomes and we expect they will have a competitive advantage to supply the market through this transition. Certification provides an incentive to produce natural gas at a higher standard than business as usual and offers companies such as Seven Generations a strong competitive advantage as the world decarbonizes. We applaud Seven Generations and Énergir for their leadership, and encourage other companies to follow in their footsteps."

Chris Severson-Baker, Alberta Regional Director, Pembina Institute

About Seven Generations

Seven Generations is a low supply-cost energy producer dedicated to stakeholder service, responsible development and generating strong returns from its liquids-rich Kakwa River Project in northwest Alberta. 7G's corporate office is in Calgary, its operations headquarters is in Grande Prairie and its shares trade on the TSX under the symbol VII.

About Énergir

With more than \$8 billion in assets, Énergir is a diversified energy company whose mission is to find increasingly sustainable ways to meet the energy needs of its 525,000 customers and the communities it serves. In Québec, it is the leading natural gas distribution company and also produces, through its subsidiaries, electricity from wind power. Through its subsidiaries in the United States, the company operates in 15 states where it produces electricity from hydraulic, wind and solar sources, while serving as the leading electricity distributor and the sole natural gas distributor in Vermont. Énergir values energy efficiency and invests both resources and efforts in innovative energy projects such as renewable natural gas and liquefied and compressed natural gas. Through its subsidiaries, it also provides a variety of energy services. Énergir aspires to become the partner of choice for those striving for a better energy future.

About Equitable Origin

Equitable Origin (EO) is a non-profit organization incorporated in the U.S., governed by a multistakeholder board of directors. Equitable Origin's mission is to partner with business, communities and government to support responsible development of energy and natural resources. Equitable Origin created the world's first stakeholder-based, independent, voluntary standards system designed to drive higher social and environmental performance, greater transparency and more accountability in energy development. Equitable Origin works with a variety of stakeholders to foster dialogue, benchmark performance and promote best practices through the EO100™ Standard for Responsible Energy Development. Equitable Origin seeks to leverage market-based mechanisms to recognize and reward responsible energy producers and to empower energy purchasers to positively influence upstream impacts and to incentivize continuous improvement.

About Pembina Institute

The Pembina Institute is a non-profit think-tank that works to advance a prosperous clean energy future for Canada through credible policy solutions that support communities, the economy, and a safe climate. We have offices in Vancouver, Calgary, Edmonton, Ottawa, and Toronto.

Fact sheet - Initiative for Responsible Procurement of Natural Gas

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Stephen Hui

Senior Communications Lead, Pembina Institute

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Reference:

Section 8.1 Procurement Process and Policy

Questions:

- a) Please provide a copy of the current Gas Supply Procurement Policies and Practices document which represent a combined group of policies and practices for both legacy utility's rate zones.

Response:

- a) Please see the Attachment to this response for the requested information.

Enbridge Gas Inc.

Gas Supply Procurement Policies and Practices

January 20, 2021

1. Introduction

This manual prescribes the Policies and Practices that govern the procurement of gas supply by Enbridge Gas Inc. (the "Company" or "EGI "). In this context, gas supply includes the physical commodity, transportation and storage services. The definition of gas for the purpose of this Policy includes conventional or fossil-based natural gas by all production methods, as well as Renewable Natural Gas ("RNG") and hydrogen. In addition to these Policies and Practices, all procurement of gas supply is made in accordance with the Affiliate Relationships Code for Gas Utilities and the Record Keeping and the Natural Gas Reporting and Record Keeping Requirements ("RRR") of the OEB.

2. Objectives

EGI has the following four objectives for procuring gas supply for sale or delivery (i.e., load balancing) to its customers:

2.1 Provide Cost-Effective Reliable Supply Through a Diversified Portfolio

This objective is intended to achieve a market sensitive price, through the use of diversified tools to provide a reasonable cost of gas for EGI ratepayers in alignment with public policy. This means minimizing risks to security of supply while finding a balance between the use of contract pricing mechanisms, delivery and contractual terms, and supply basin diversification to achieve this goal.

2.2 Minimize Exposure to Counterparties in All Gas Supply Transactions

This objective is in place to recognize the need for prudent credit practices in gas supply procurement.

2.3 Ensure Fairness to All Counterparties in All Gas Supply Transactions

EGI ensures that all transactions are carried out with integrity with no preferential treatment shown towards any counterparty.

2.4 Operate Within Corporate Governance and Controls

Corporate Governance is an integral part of the Policy. The Gas Supply portfolio has oversight by the VP, Energy Services. All transactions are approved according to Authorized Transactions Limits and have appropriate internal controls in place.

3. CONTROLS

There are five independent controls built into the Policy:

- 1) Corporate Governance through the VP, Energy Services review of the gas supply plan;
- 2) Transactions in the procurement plan approved per Authorized Transaction Limits within the Vice President Energy Services group
- 3) Segregation of the responsibilities between the front office (transactors), middle office (Risk, Contracts and Credit) and the Back office (accounting and administration) functions;
- 4) Internal audits of the transactions;
- 5) Exception reporting

3.1 Corporate Governance

VP Energy Services, at least annually, review and approve the Gas Supply Plan. In accordance with Authorized Transaction Limits, the presiding Vice President, has full authority to implement the plan including the purchase of gas incremental to the Gas Supply Plan that may be required. The Gas Supply Plan is used to establish the monthly procurement plan.

3.2 Procurement Plan Approval

The Gas Supply department develops the monthly procurement plan for transactions to be executed.

The presiding Vice President or Director, Gas Supply and the Manager, Gas Supply or their delegate, sign the monthly procurement plan as required per the Authorized Transaction Limits. This approval and the Authorized Transactor List provides all necessary authorizations for the transactors to execute the transactions in the procurement plan.

3.3 Segregation of Duties

Front Office

- Verifies credit limits before deal execution
- Executes trades and contracts in accordance with these Procedures
- Enters transactions into systems of record
- Monitors price exposures and develops strategies to manage identified price risks based on net open position reports
- Reviews transactions for accuracy

Middle Office

Risk Control:

- Monitors transaction capture and associated pricing information
- Distributes Translogs to Front Office where applicable
- Monitors and maintains Authorized Transactor List to daily transactions

Contracts:

- Enters transactions into systems of record on behalf of Front Office when required
- Prepares contractual documentation for physical and financial transactions
- Manages the confirmation process for Physical Commodity Transactions
- Arranges physical contracts with counterparties

Credit:

- Review of counterparties and associated credit requirements
- Establishing credit lines and credit support (if required)
- Monitors and reports on the Credit Risk associated with counterparties

Back Office

Invoicing:

- Verifies Counterparty invoices

Finance:

- Arranges transfer of funds to settle transactions
- Accounting for transactions and financial report distribution

3.4 Internal Audit of Transactions

Periodically, the Internal Audit department (“Audit”) initiates and conducts an audit of transactions. The intent of the audit is to ensure the Policy is being followed. In the event that Audit discovers any discrepancies relating to transactions, settlements, etc. that could expose the Company to legal liability, the Director, Gas Supply is notified immediately.

3.5 Exception Reporting

The transactors adhere to the Policy as completely as possible in all circumstances. However, EGI recognizes that exceptions to the Policy may be required in certain market situations and such exceptions are approved per the Manager, Risk Control prior to commitment.

4. Credit

The credit guidelines apply to all gas supply transactions. The intent of the guidelines are to maintain prudent credit practices while balancing with the need to maintain ample alternatives for acquiring gas supplies.

Counterparty assessments are performed in conjunction with any transactions that present a financial risk to EGI if the supply had to be replaced due to counterparty default. Counterparty assessments follow industry best practices and consider information such as public rating agency information, counterparty financial information, and any other quantitative or qualitative information that may be available. If appropriate, unsecured credit limits are established to cover the transaction risk. In cases where a sufficient unsecured credit limit cannot be established, credit support is requested. Counterparty creditworthiness and relative financial risk are monitored on an on-going basis. Any concerns are discussed with Gas Supply and appropriate actions are undertaken to mitigate any associated risk.

5. Means of Procurement

EGI will procure each tranche of gas supply commodity under agreements reached with existing or new suppliers by the following means:

- a) a bidding process involving a request for bids for the tranche of gas supply commodity;
- b) a straight purchase; or
- c) an electronic transaction using an electronic exchange or an electronic trading platform, or both, for which the Company has trading privileges.

EGI may procure a tranche of gas supply commodity by other means, however, for the following reasons:

- a) to meet immediate security of supply, reliability of supply, or emergency situations;
- b) to develop a business relationship with a particular supplier;
- c) to accept a unique, unsolicited supply proposal from a particular supplier;
- d) to accept an unsolicited offer for a tranche of gas supply for a period of one through five days when the price is lower than the current market price for the delivery point(s) specified in the offer;
- e) to purchase gas from the Company's customers as part of direct purchase arrangements; or
- f) to purchase gas produced in the Province of Ontario.

The Company will prepare and file annually, with the Ontario Energy Board's Chief Regulatory Auditor, a report on all transactions to procure gas supply commodity that do not comply with the foregoing. The report will provide the particulars of each such agreement, including the name of the supplier, and an explanation and justification for non-compliance.

5.1 Bidding Process

EGI will send a request for bids on a select tranche of gas supply commodity required by the Company. The following information will be included in each request for bids:

- a) *the purchaser (i.e., Enbridge Gas Inc.);*
- b) *the delivery point(s) by pipeline;*
- c) *the type of supply (i.e., firm or interruptible);*

- d) *the term;*
- e) *the bid deadline; and,*
- f) *any other particulars.*

The transactor will note the date and time of receipt on each bid except when such a notation already appears on the bid; for example, bids sent electronically. The Company, or will record the name of the suppliers or service providers from whom the Company received a bid.

In the event of a Blind RFP for Storage Capacity or Gas Supply Commodity, the Company will engage an RFP Manager and develop a matrix outlining the requirements for the service. The RFP Manager will be responsible for issuing the RFP, collecting the RFP responses and providing them to EGI in blind form.

The Company will evaluate all bids in a fair and consistent manner according to the following criteria:

- the lowest reasonable price having regard not only to the bid price *per se*, but also the specific service attributes, benefits or risks inherent in each bid made in accordance with the terms and conditions specified in the request for bids; and,
- whenever a supplier offers different terms and conditions in its bid, as an alternative to the Company specified terms and conditions, the lowest reasonable price having regard not only to the bid price *per se*, but also the specific service attributes, benefits and risks inherent in the alternative.

The Company will award the tranche of gas supply commodity to the bidder offering the lowest price unless there are offsetting risks in the bid, compared to another bid at a higher price, or offsetting service attributes or benefits in another bid at a higher price. In this event, the Company may award the tranche of gas supply commodity to the bidder offering a higher price.

In the event of a blind RFP, the third party agent will coordinate collection of the bids and ensure that the bidder's name and/or other identifying information is removed from the bid prior to the Company evaluating the bid.

5.2 Straight Purchases

EGI may procure gas supply commodity by means of a straight purchase from a supplier. This may include cases where liquidity, diversity or other market conditions make direct negotiations with a supplier more favorable than a bidding process.

6. **Electronic Transactions**

EGI may procure a tranche of gas supply commodity by means of transactions on one or more electronic exchange(s) or electronic trading platform(s), or both, for which the Company has trading privileges; for example, Intercontinental Exchange Inc. ("ICE") and

Natural Gas Exchange Inc. ("NGX"). Some electronic exchanges and electronic trading platforms operate such that the identity of the prospective supplier is not disclosed until the transaction is complete. The Company will identify in the agreement entered into with an electronic exchange or an electronic trading platform a list of approved counterparties for its gas supply transactions.

Effective January 20, 2021



Jason Gillett, Director Gas Supply



Jim Redford, VP Energy Services

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Reference:

p. 54

Questions:

With respect to the *Gas Supply Procurement Policies and Practices* document:

- a. Enbridge states that the “updated document was sent to the Board in December 2019”. Is EGI referring to its Board of Directors or the Ontario Energy Board?
- b. Please provide a copy of the document in advance of the stakeholder meeting.

Response:

- a) EGI is referring to the Ontario Energy Board.
- b) Please see Exhibit I.PP.9 a). The requested information has been filed as part of the materials provided to the OEB and parties to this proceeding.

TAB 5

Table 2 – Design Day Demand Forecast (Revised)

Line						
No.	Particulars (TJ/d)	2020/21	2021/22	2022/23	2023/24	2024/25
1	EGD	4,022	4,040	4,057	4,074	4,090
2	Union North West	128	128	128	128	127
3	Union North East	398	404	406	410	409
4	Union South	3,118	3,269	3,325	3,351	3,540

Table 4 – Storage Requirement Forecast (Revised)

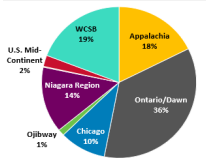
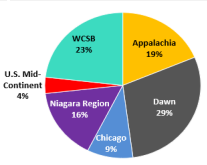
Line No.	Particulars (PJ)	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>EGD</u>					
1	Infranchise Storage Requirement					
2	Infranchise Customer Requirement	126.2	126.2	126.2	126.2	126.2
3	Cost-Based Storage					
4	Tecumseh	99.4	99.4	99.4	99.4	99.4
5	Welland	0.3	0.3	0.3	0.3	0.3
6	Market Based Storage	26.5	26.5	26.5	26.5	26.5
7	Space Allocated for Infranchise Use	126.2	126.2	126.2	126.2	126.2
	<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

Table 14 – Union South Rate Zone Design Day Position (Revised)

Line No.	Particulars (TJ/d)	2020/21	2021/22	2022/23	2023/24	2024/25
	<u>Demand</u>					
1	Union South	3,118	3,269	3,325	3,351	3,540
	<u>Supply Asset</u>					
2	Great Lakes	21	21	21	21	21
3	Nexus	106	106	106	106	106
4	Non-obligated (e.g. Power Plants)	254	254	273	273	273
5	Ontario Dawn	520	560	566	566	569
6	Ontario Parkway	227	240	242	242	240
7	Panhandle	60	60	60	60	60
8	Storage	1,822	1,920	1,949	1,975	2,162
9	TCPL Long-Haul	3	3	3	3	3
10	TCPL Niagara	21	21	21	21	21
11	Vector	84	84	84	84	84
12	Total Supply	3,118	3,269	3,325	3,351	3,540
13	Excess(Shortfall)	-	-	-	-	-

* includes Sales Service, Bundled DP, T-Service

2019/20 PERFORMANCE METRICS Enbridge Gas Inc.

OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
COST EFFECTIVENESS					
The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.	Policies and Procedures	Demonstrates EGI's consideration of timely pricing information and the utility's ability to transact according to internal policies for managing counterparty risk	Procurement plan reviewed and approved as outlined in the policy	C	C
			Transacting counterparties have met appropriate credit requirements	C	C
	Weather Variance ¹	Illustrates weather risk in EGI's Plan correlated with price variances (e.g. Positive HDD variances tends to lead to higher prices)	HDD Variance - EGD CDA	6%	1%
			HDD Variance - EGD EDA	9%	2%
			HDD Variance - EGD Niagara	6%	0%
			HDD Variance - Union North West	10%	5%
			HDD Variance - Union North East	3%	-2%
			HDD Variance - Union South	3%	-1%
	Price Effectiveness	Demonstrates the diversity of supply terms within EGI's procurement plan through a layered approach to contracting	Distribution of procurement supply terms:		
			Less than one month	14%	3%
		Monthly	28%	27%	
		Seasonal	25%	36%	
	Annual or longer	32%	34%		
		Illustrates price stability and consistency in EGI's Plan	Reference Price ²		
RELIABILITY AND SECURITY OF SUPPLY					
The gas supply plans will ensure the reliable and secure supply of gas. Reliability and security of supply is achieved by ensuring gas supply to various receipt points to meet planned peak day and seasonal gas delivery requirements.	Design Day	Demonstrates the extent to which EGI is able to procure assets required to meet design day demand, indicating the reliability of the plan	Acquired assets to meet design day requirements, as identified by the plan	100%	100%
	Storage	Demonstrates EGI's execution of its storage inventory strategy	Percentage of actual storage target at November 1 compared to the plan	98%	98%
			Percentage of actual storage target at February 28 compared to the plan	100%	100%
			Percentage of actual storage target at March 31 compared to the plan	95%	100%
	Communication	Ensure ongoing communication and understanding between planning and operations teams	Meet once a month at a minimum to discuss inventory position relative to targets and what action is required	C	C
			Instances when QRAM expected bill impacts exceed +/- 25% on the commodity portion of a customer's bill	0	2
			Communicated to ratepayers when bill impacts on the commodity portion of a customer's bill exceed +25%	C	C
	Diversity	Illustrates EGI's diversity of basin, contract term, counterparties and supply procurement in the plan	Supply basin diversity ³		
			Percentage of contracts with remaining terms		
			1-5 years	23%	15%
			6-10 years	33%	44%
			> 10 years	44%	40%
			Total number of unique counterparties	56	58
	Total number of receipt points	27	29		

2019/20 PERFORMANCE METRICS Enbridge Gas Inc.

OEB Guiding Principle	Performance Categories	Intent of Measures	Measures	2018/19 Results	2019/20 Results
	Reliability	Reports EGI's experience with pipeline and supply disruptions demonstrating the reliability of the portfolio	Number of days of force majeure on upstream pipelines that reduced capacity	0	0
			Number of days of force majeure on upstream pipelines impacting customers' security of supply	0	0
			Number of days of failed delivery of supply	61	74
			Number of days of failed delivery of supply impacting customers security of supply	0	0
			Number of days of forced majeure on storage assets	0	0
PUBLIC POLICY					
The gas supply plan will be developed to ensure that it supports and is aligned with public policy where appropriate.	Supporting Policy	Reports public policy considered in EGI's Plan	Community expansion addressed in the plan	C	C
			DSM savings addressed in the plan	C	C
			Federal Carbon Pricing Program addressed in the plan	C	C
			Percentage of RNG portfolio	0%	0%

Footnotes:

C - Compliant, NI - Needs Improvement

1 - Positive variance indicates colder than planned weather. Negative variance indicates warmer than planned weather.

2 - As filed in QRAM proceeding

3 - For data see Section 9.3