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September 23, 2021

VIA RESS AND EMAIL

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

Dear Christine Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2021-0149
2020 Utility Earnings/Disposition of Deferral Variance Account Balances
Updated Evidence / Interrogatory Response**

Further to the application and evidence filed by Enbridge Gas on June 4, 2021, and the interrogatory responses filed on September 8, 2021, please find the enclosed updated exhibits:

Exhibit	Correction
Exhibit B, Tab 1 Schedule 4	<p>Reclassification of \$16.5M of capital additions and the related depreciation from Underground Storage to Distribution Plant-Southern Operations in the Union Rate Zone.</p> <p><u>Union Rate Zone</u> Page 2 – Line 8 Underground Storage Plant Page 2 – Line 10 Distribution Plant – Southern Operations</p> <p><u>Union Rate Zones Underground Storage Plant</u> Page 4 – Line 56 Regulatory Overheads Page 4 – Line 57 Sub-Total</p> <p><u>Union Rate Zones Distribution Plant - Southern Operations</u> Page 4 – Line 78 Regulatory Overheads Page 4 – Line 79 Sub-Total</p> <p><u>Union Rate Zones Underground Storage Plant</u> Page 7 – Line 50 Regulatory Overheads Page 7 – Line 51 Sub-Total</p>

	<u>Union Rate Zones Distribution Plant - Southern Operations</u> Page 7 – Line 69 Regulatory Overheads Page 7 – Line 70 Sub-Total
Exhibit	Additional Information Provided
Exhibit I.EP.9, part c	Legacy EGD Storage RFP Timeline

If you have any questions, please contact the undersigned.

Sincerely,

Richard Wathy
Technical Manager, Regulatory Applications

c.c.: Intervenor (EB-2021-0149)

EGI UTILITY RATE BASE
2020 ACTUAL

Line No.	Col. 1	Col. 2
	2020 Actual	2019 Actual
	(\$Millions)	(\$Millions)
<u>Property, Plant, and Equipment</u>		
1. Gross property, plant, and equipment	20,582.1	19,765.5
2. Accumulated depreciation	<u>(7,571.2)</u>	<u>(7,188.7)</u>
3. Net property, plant, and equipment	<u>13,010.8</u>	<u>12,576.8</u>
<u>Allowance for Working Capital</u>		
4. Materials and supplies	82.2	74.9
5. ABC receivable	(22.3)	(30.2)
6. Customer security deposits	(81.8)	(91.0)
7. Prepaid expenses	3.1	5.6
8. Balancing gas	59.5	56.2
9. Gas in storage	487.5	522.0
10. Working cash allowance	<u>23.0</u>	<u>24.9</u>
11. Total Working Capital	<u>551.2</u>	<u>562.3</u>
12. <u>Utility Rate Base</u>	<u><u>13,562.0</u></u>	<u><u>13,139.0</u></u>

EGI UTILITY PROPERTY, PLANT, AND EQUIPMENT
SUMMARY STATEMENT - AVERAGE OF MONTHLY AVERAGES
2020 ACTUAL

Line No.	Col. 1 Gross Property, Plant, and Equipment (\$Millions)	Col. 2 Accumulated Depreciation (\$Millions)	Col. 3 Net Property, Plant, and Equipment (\$Millions)	
EGD Rate Zone				
1. Underground storage plant	442.2	(142.9)	299.3	
2. Distribution plant	9,209.1	(2,933.5)	6,275.5	
3. General plant	657.9	(480.3)	177.6	
4. Plant held for future use	1.7	(1.4)	0.3	
5. EGD Rate Zone Total	<u>10,310.8</u>	<u>(3,558.1)</u>	<u>6,752.7</u>	
Union Rate Zones				
6. Intangible plant	1.7	(1.2)	0.5	
7. Local storage plant	32.3	(16.8)	15.5	
8. Underground storage plant	812.3	(316.8)	495.4	/u
9. Transmission plant	3,636.8	(1,104.4)	2,532.4	
10. Distribution plant - Southern operations	3,332.6	(1,441.1)	1,891.4	/u
11. Distribution plant - Northern and Eastern operations	2,049.0	(923.8)	1,125.3	
12. General plant	406.5	(209.0)	197.5	
13. Union Rate Zones Total	<u>10,271.2</u>	<u>(4,013.1)</u>	<u>6,258.1</u>	
14. EGI Total	<u>20,582.1</u>	<u>(7,571.2)</u>	<u>13,010.8</u>	

EGI UTILITY GROSS PLANT
YEAR END BALANCES AND AVERAGE OF MONTHLY AVERAGES
2020 ACTUAL

Line No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7
		Opening Balance Dec.2019	Additions	Retirements	Closing Balance Dec.2020	Regulatory Adjustment	Utility Balance Dec.2020	Average of Monthly Averages
		(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)
EGD Rate Zone Underground Storage Plant								
1.	Crowland storage (450/459)	4.2	(0.0)	-	4.2	-	4.2	4.2
2.	Land and gas storage rights (450/451)	46.3	-	-	46.3	(1.0)	45.3	45.3
3.	Structures and improvements (452)	31.1	0.3	(0.0)	31.3	(0.1)	31.3	31.1
4.	Wells (453)	59.1	10.0	-	69.1	-	69.1	59.6
5.	Well equipment (454)	10.9	1.6	-	12.5	-	12.5	11.0
6.	Field Lines (455)	106.1	9.2	-	115.3	-	115.3	106.5
7.	Compressor equipment (456)	135.4	22.9	-	158.3	(0.5)	157.8	140.4
8.	Measuring and regulating equipment (457)	11.2	-	-	11.1	-	11.1	11.1
9.	Base pressure gas (458)	33.4	(0.0)	(1.1)	32.3	-	32.3	33.1
10.	Sub-Total	437.6	43.9	(1.1)	480.5	(1.5)	478.9	442.2
EGD Rate Zone Distribution Plant								
11.	Renewable Natural Gas (461)	-	-	-	-	-	-	-
12.	Land (470)	43.8	10.0	-	53.7	-	53.7	44.2
13.	Offers to purchase (470)	-	-	-	0.0	-	0.0	0.0
14.	Land rights intangibles (471)	63.8	-	-	63.8	-	63.8	63.8
15.	Structures and improvements (472)	146.0	5.0	(0.0)	151.0	(0.3)	150.7	146.1
16.	Services, house reg & meter install. (473/474)	3,091.2	223.0	(8.3)	3,306.0	-	3,306.0	3,187.5
17.	Mains (475)	4,692.0	144.5	(109.1)	4,727.4	(2.2)	4,725.2	4,637.5
18.	NGV station compressors (476)	4.5	1.0	-	5.5	-	5.5	4.9
19.	Measuring and regulating equip. (477)	629.8	58.1	(3.2)	684.7	(0.5)	684.2	644.2
20.	Meters (478)	497.6	22.1	-	519.6	-	519.6	481.0
21.	Sub-Total	9,168.6	463.7	(120.6)	9,511.7	(3.1)	9,508.6	9,209.1
EGD Rate Zone General Plant								
22.	Lease improvements (482)	0.1	-	-	0.1	(0.2)	(0.1)	(0.1)
23.	Office furniture and equipment (483)	20.9	0.0	-	21.0	-	21.0	21.0
24.	Transportation equipment (484)	63.2	(0.9)	(0.6)	61.7	(0.1)	61.7	56.1
25.	NGV conversion kits (484)	2.5	0.5	-	2.9	-	2.9	2.8
26.	Heavy work equipment (485)	17.3	2.9	-	20.2	-	20.2	17.9
27.	Tools and work equipment (486)	50.9	8.4	(0.0)	59.3	-	59.3	56.6
28.	Rental equipment (487)	1.8	0.0	-	1.8	-	1.8	1.8
29.	NGV rental compressors (487)	7.4	12.8	-	20.2	-	20.2	13.4
30.	NGV cylinders (484 and 487)	0.6	0.3	-	1.0	-	1.0	0.9
31.	Communication structures & equip. (488)	3.7	(0.0)	-	3.7	-	3.7	3.7
32.	Computer equipment (490)	30.0	5.0	(3.0)	32.1	-	32.1	32.1
33.	Software Acquired/Developed (491)	235.0	34.6	(15.4)	254.3	-	254.3	232.4
34.	CIS (491)	127.1	-	-	127.1	-	127.1	127.1
35.	WAMS (489)	92.2	-	(0.1)	92.1	-	92.1	92.2
36.	Sub-Total	652.7	63.7	(19.1)	697.4	(0.3)	697.1	657.9

EGD Rate Zone Plant held for future use

37.	Inactive services (102)	1.7	-	-	1.7	-	1.7	1.7
38.	EGD Rate Zone Total	10,260.6	571.3	(140.7)	10,691.2	(4.8)	10,686.3	10,310.8

Union Rate Zones Intangible Plant

39.	Franchises and consents (401)	1.2	-	-	1.2	-	1.2	1.2
40.	Other intangible plant (402)	0.5	-	-	0.5	-	0.5	0.5
41.	Sub-Total	1.7	-	-	1.7	-	1.7	1.7

Union Rate Zones Local Storage Plant

42.	Land (440)	0.0	-	-	0.0	-	0.0	0.0
43.	Structures and improvements (442)	4.7	0.5	-	5.2	-	5.2	4.8
44.	Gas holders - storage (443)	4.6	-	-	4.6	-	4.6	4.6
45.	Gas holders - equipment (443)	20.0	0.2	-	20.2	-	20.2	20.0
46.	Regulatory Overheads	3.1	(1.3)	-	1.8	-	1.8	2.9
47.	Sub-Total	32.4	(0.6)	-	31.8	-	31.8	32.3

Union Rate Zones Underground Storage Plant

48.	Land (450)	5.6	1.7	-	7.2	-	7.2	5.6
49.	Land rights (451)	32.0	-	-	32.0	-	32.0	32.0
50.	Structures and improvements (452)	68.8	0.5	-	69.3	-	69.3	68.9
51.	Wells (453)	47.3	0.8	(0.1)	48.0	-	48.0	47.4
52.	Field Lines (455)	46.9	3.7	-	50.6	-	50.6	47.9
53.	Compressor equipment (456)	470.0	2.2	(2.1)	470.1	-	470.1	470.4
54.	Measuring and regulating equipment (457)	85.1	1.3	-	86.4	-	86.4	85.6
55.	Base pressure gas (458)	36.6	-	(0.4)	36.2	-	36.2	36.5
56.	Regulatory Overheads	17.6	0.6	-	18.1	-	18.1	17.9
57.	Sub-Total	809.7	10.7	(2.5)	817.9	-	817.9	812.3

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Union Rate Zones Transmission Plant

58.	Land (460)	75.4	10.3	(3.5)	82.2	-	82.2	74.2
59.	Land rights (461)	66.2	1.3	-	67.5	-	67.5	66.5
60.	Structures & improvements (462/463/464)	165.9	0.3	-	166.3	-	166.3	165.9
61.	Mains (465)	1,880.5	76.0	(1.9)	1,954.5	-	1,954.5	1,891.7
62.	Compressor equipment (466)	940.9	1.7	-	942.6	-	942.6	941.0
63.	Measuring & regulating equipment (467)	299.1	21.8	(0.0)	321.0	-	321.0	301.0
64.	Line Pack Gas	7.5	-	-	7.5	-	7.5	7.5
65.	Regulatory Overheads	176.8	23.3	-	200.1	-	200.1	189.0
66.	Sub-Total	3,612.2	134.8	(5.5)	3,741.6	-	3,741.6	3,636.8

Union Rate Zones Distribution Plant - Southern Operations

67.	Land (470)	11.8	0.8	-	12.6	-	12.6	12.1
68.	Land rights (471)	8.2	0.7	-	8.9	-	8.9	8.6
69.	Structures and improvements (472)	136.6	3.0	-	139.6	-	139.6	137.1
70.	Services - metallic (473)	126.0	2.4	0.0	128.4	-	128.4	126.7
71.	Services - plastic (473)	925.7	32.8	(1.7)	956.7	-	956.7	939.6
72.	Regulators (474)	91.1	6.0	-	97.1	-	97.1	95.4
73.	House regulators & meter installations (474)	73.5	3.5	-	76.9	-	76.9	74.1
74.	Mains - metallic (475)	557.3	25.9	(1.4)	581.8	-	581.8	555.7
75.	Mains - plastic (475)	674.1	32.9	(0.5)	706.4	-	706.4	684.0
76.	Measuring & regulating equipment (477)	50.4	9.9	-	60.3	-	60.3	52.6
77.	Meters (478)	355.0	22.5	(4.2)	373.3	-	373.3	360.9
78.	Regulatory Overheads	264.6	50.7	-	315.2	-	315.2	285.9
79.	Sub-total	3,274.2	190.9	(7.9)	3,457.2	-	3,457.2	3,332.6

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Union Rate Zones Distribution Plant - Northern & Eastern Operations

80.	Land (470)	4.6	0.3	-	5.0	-	5.0	4.8
81.	Land rights (471)	10.5	0.1	-	10.6	-	10.6	10.5
82.	Structures and improvements (472)	67.5	1.1	-	68.6	-	68.6	67.8
83.	Services - metallic (473)	108.5	1.6	(0.0)	110.1	-	110.1	109.4
84.	Services - plastic (473)	478.2	12.2	(0.8)	489.6	-	489.6	482.1
85.	Regulators (474)	41.4	(2.4)	-	39.0	-	39.0	39.8
86.	House regulators & meter installations (474)	40.9	0.6	-	41.5	-	41.5	41.2
87.	Mains - metallic (475)	625.4	55.4	(0.2)	680.5	-	680.5	645.0
88.	Mains - plastic (475)	238.3	0.5	(0.1)	238.7	-	238.7	239.0
89.	Measuring & regulating equipment (477)	145.9	5.4	-	151.3	-	151.3	146.6
90.	Meters (478)	88.8	9.5	(1.4)	96.8	-	96.8	92.5
91.	Regulatory Overheads	168.7	4.4	-	173.1	-	173.1	170.3
92.	Sub-total	2,018.7	88.7	(2.7)	2,104.7	-	2,104.7	2,049.0

Union Rate Zones General Plant

93.	Land (480)	0.6	-	-	0.5	-	0.5	0.5
94.	Structures & improvements (482)	73.0	1.1	(0.3)	73.8	-	73.8	73.3
95.	Office furniture and equipment (483)	10.1	-	-	10.1	-	10.1	10.1
96.	Office equipment - computers (483)	120.8	8.4	-	129.2	-	129.2	122.6
97.	Transportation equipment (484)	63.7	6.5	(5.5)	64.6	-	64.6	64.4
98.	Heavy work equipment (485)	19.3	1.1	(1.2)	19.2	-	19.2	21.0
99.	Tools and work equipment (486)	37.2	2.0	-	39.2	-	39.2	37.7
100.	NGV fuel equipment (487)	2.0	1.2	-	3.2	-	3.2	2.6
101.	Communication equipment (488)	14.1	0.2	-	14.3	-	14.3	14.2
102.	Regulatory Overheads	57.3	7.0	-	64.3	-	64.3	60.1
103.	Sub-total	398.1	27.5	(7.0)	418.6	-	418.6	406.5
104.	Union Rate Zones Total	10,147.0	452.1	(25.5)	10,573.6	-	10,573.6	10,271.2
105.	EGI Total	20,407.6	1,023.4	(166.2)	21,264.7	(4.8)	21,259.9	20,582.1

EGI UTILITY PLANT
CONTINUITY OF ACCUMULATED DEPRECIATION
YEAR END BALANCES AND AVERAGE OF MONTHLY AVERAGES
2020 ACTUAL

Line No.		Col. 1 Opening Balance Dec.2019	Col. 2 Additions	Col. 3 Retirements	Col. 4 Costs Net of Proceeds	Col. 5 Closing Balance Dec.2020	Col. 6 Regulatory Adjustment	Col. 7 Utility Balance Dec.2020	Col. 8 Average of Monthly Averages
		(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)
EGD Rate Zone Underground Storage Plant									
1.	Crowland storage (450/459)	(1.4)	(0.0)	-	-	(1.4)	-	(1.4)	(1.4)
2.	Land and gas storage rights (451)	(25.2)	(0.5)	-	-	(25.7)	-	(25.7)	(25.5)
3.	Structures and improvements (452)	(1.7)	(0.6)	0.0	-	(2.2)	0.1	(2.2)	(1.9)
4.	Wells (453)	(13.3)	(1.0)	-	-	(14.2)	-	(14.2)	(13.7)
5.	Well equipment (454)	(7.0)	(0.6)	-	-	(7.6)	-	(7.6)	(7.3)
6.	Field Lines (455)	(31.3)	(1.6)	-	-	(32.9)	-	(32.9)	(32.1)
7.	Compressor equipment (456)	(52.4)	(4.3)	-	4.4	(52.3)	0.3	(52.0)	(53.4)
8.	Measuring and regulating equipment (457)	(7.5)	(0.3)	-	-	(7.9)	-	(7.9)	(7.7)
9.	Sub-Total	(139.7)	(8.9)	0.0	4.4	(144.2)	0.3	(143.9)	(142.9)
EGD Rate Zone Distribution Plant									
10.	Renewable Natural Gas (461)	-	-	-	-	-	-	-	-
11.	Land rights intangibles (471)	(5.0)	(0.8)	-	-	(5.7)	-	(5.7)	(5.4)
12.	Structures and improvements (472)	(34.0)	(9.0)	0.0	-	(42.9)	0.3	(42.6)	(38.4)
13.	Services, house reg & meter install. (473/474)	(1,065.6)	(73.4)	8.3	26.5	(1,104.3)	-	(1,104.3)	(1,085.5)
14.	Mains (475)	(1,314.1)	(100.8)	109.1	9.9	(1,295.9)	2.1	(1,293.8)	(1,271.9)
15.	NGV station compressors (476)	(3.0)	(0.3)	-	-	(3.3)	-	(3.3)	(3.1)
16.	Measuring and regulating equip. (477)	(243.1)	(13.0)	3.2	0.5	(252.4)	0.5	(251.9)	(247.5)
17.	Meters (478)	(262.1)	(41.3)	-	0.1	(303.2)	-	(303.2)	(281.8)
18.	Sub-Total	(2,926.8)	(238.5)	120.6	37.0	(3,007.7)	2.9	(3,004.8)	(2,933.5)
EGD Rate Zone General Plant									
19.	Lease improvements (482)	(0.1)	(0.0)	-	-	(0.1)	0.2	0.1	0.1
20.	Office furniture and equipment (483)	(10.4)	(2.2)	-	-	(12.6)	-	(12.6)	(11.5)
21.	Transportation equipment (484)	(26.3)	(6.5)	0.6	(0.0)	(32.2)	0.1	(32.2)	(29.0)
22.	NGV conversion kits (484)	0.7	(0.3)	-	-	0.4	-	0.4	0.6
23.	Heavy work equipment (485)	(5.3)	(0.7)	-	-	(6.0)	-	(6.0)	(5.7)
24.	Tools and work equipment (486)	(19.9)	(2.4)	0.0	(0.0)	(22.3)	-	(22.3)	(21.1)
25.	Rental equipment (487)	(1.1)	(0.0)	-	-	(1.1)	-	(1.1)	(1.1)
26.	NGV rental compressors (487)	(1.3)	(1.4)	-	-	(2.7)	-	(2.7)	(1.9)
27.	NGV cylinders (484 and 487)	(0.6)	0.0	-	-	(0.5)	-	(0.5)	(0.6)
28.	Communication structures & equip. (488)	(1.1)	(0.4)	-	-	(1.4)	-	(1.4)	(1.2)
29.	Computer equipment (490)	(28.9)	(5.8)	3.1	-	(31.6)	-	(31.6)	(31.8)
30.	Software Acquired/Developed (491)	(212.1)	(33.2)	15.4	-	(229.9)	-	(229.9)	(216.3)
31.	CIS (491)	(127.1)	-	-	-	(127.1)	-	(127.1)	(127.1)
32.	WAMS (489)	(29.1)	(9.2)	-	-	(38.4)	-	(38.4)	(33.8)
33.	Sub-Total	(462.5)	(62.0)	19.1	(0.0)	(505.5)	0.3	(505.2)	(480.3)
EGD Rate Zone Plant held for future use									
34.	Inactive services (102)	(1.4)	(0.0)	-	-	(1.4)	-	(1.4)	(1.4)
35.	EGD Rate Zone Total	(3,530.4)	(309.5)	139.7	41.3	(3,658.8)	3.5	(3,655.3)	(3,558.1)
Union Rate Zones Intangible Plant									
36.	Franchises and consents (401)	(0.9)	(0.1)	-	-	(0.9)	-	(0.9)	(0.9)
37.	Other intangible plant (402)	(0.3)	(0.0)	-	-	(0.3)	-	(0.3)	(0.3)
38.	Sub-Total	(1.2)	(0.1)	-	-	(1.2)	-	(1.2)	(1.2)

Union Rate Zones Local Storage Plant								
39.	Structures and improvements (442)	(2.6)	(0.1)	-	-	(2.7)	-	(2.7)
40.	Gas holders - storage (443)	(3.7)	(0.1)	-	-	(3.8)	-	(3.7)
41.	Gas holders - equipment (443)	(9.6)	(0.7)	-	-	(10.3)	-	(9.9)
42.	Regulatory Overheads	(0.4)	(0.1)	-	-	(0.5)	-	(0.5)
43.	Sub-Total	(16.3)	(1.1)	-	-	(17.3)	-	(16.8)
Union Rate Zones Underground Storage Plant								
44.	Land rights (451)	(17.4)	(0.7)	-	-	(18.1)	-	(17.8)
45.	Structures and improvements (452)	(40.4)	(1.7)	-	-	(42.1)	-	(41.3)
46.	Wells (453)	(31.9)	(1.2)	0.1	0.0	(33.0)	-	(32.4)
47.	Field Lines (455)	(27.3)	(1.2)	-	-	(28.4)	-	(27.8)
48.	Compressor equipment (456)	(145.0)	(12.6)	2.1	-	(155.6)	-	(151.3)
49.	Measuring & regulating equipment (457)	(41.6)	(2.7)	-	-	(44.3)	-	(43.0)
50.	Regulatory Overheads	(3.1)	(0.5)	-	-	(3.6)	-	(3.3)
51.	Sub-Total	(306.7)	(20.5)	2.1	0.0	(325.1)	-	(316.8)
Union Rate Zones Transmission Plant								
52.	Land rights (461)	(16.9)	(1.2)	-	-	(18.1)	-	(17.5)
53.	Structures & improvements (462/463/464)	(40.1)	(3.4)	-	-	(43.5)	-	(41.8)
54.	Mains (465)	(627.4)	(37.4)	1.9	-	(662.8)	-	(645.9)
55.	Compressor equipment (466)	(263.5)	(30.4)	-	-	(293.9)	-	(278.7)
56.	Measuring & regulating equipment (467)	(96.3)	(7.8)	0.0	-	(104.0)	-	(100.1)
57.	Regulatory Overheads	(18.1)	(4.7)	-	-	(22.8)	-	(20.4)
58.	Sub-Total	(1,062.2)	(84.8)	1.9	-	(1,145.1)	-	(1,104.4)
Union Rate Zones Distribution Plant - Southern Operations								
59.	Land rights (471)	(2.1)	(0.1)	-	-	(2.3)	-	(2.2)
60.	Structures and improvements (472)	(41.3)	(3.0)	-	-	(44.3)	-	(42.8)
61.	Services - metallic (473)	(105.9)	(3.6)	(0.0)	2.2	(107.3)	-	(106.8)
62.	Services - plastic (473)	(407.9)	(23.6)	1.7	1.2	(428.6)	-	(421.2)
63.	Regulators (474)	(37.0)	(4.8)	-	-	(41.7)	-	(39.3)
64.	House regulators & meter installations (474)	(28.1)	(2.1)	-	0.0	(30.1)	-	(29.1)
65.	Mains - metallic (475)	(353.4)	(15.6)	1.4	4.0	(363.6)	-	(358.4)
66.	Mains - plastic (475)	(270.7)	(15.8)	0.6	0.6	(285.4)	-	(278.2)
67.	Measuring & regulating equipment (477)	(20.1)	(1.9)	-	0.5	(21.5)	-	(20.8)
68.	Meters (478)	(97.1)	(13.8)	4.2	(0.1)	(106.8)	-	(102.1)
69.	Regulatory Overheads	(36.4)	(8.1)	-	-	(44.5)	-	(40.3)
70.	Sub-Total	(1,399.9)	(92.3)	7.8	8.3	(1,476.1)	-	(1,441.1)
Union Rate Zones Distribution Plant - Northern & Eastern Operations								
71.	Land rights intangibles (471)	(4.2)	(0.2)	-	-	(4.3)	-	(4.2)
72.	Structures and improvements (472)	(25.0)	(1.6)	-	-	(26.7)	-	(25.9)
73.	Services - metallic (473)	(75.7)	(3.5)	0.0	0.5	(78.6)	-	(77.4)
74.	Services - plastic (473)	(207.6)	(12.5)	0.8	0.3	(219.0)	-	(213.8)
75.	Regulators (474)	(13.6)	(2.0)	-	(0.0)	(15.6)	-	(14.6)
76.	House regulators & meter installations (474)	(15.3)	(1.2)	-	-	(16.5)	-	(15.9)
77.	Mains - metallic (475)	(329.9)	(19.3)	0.3	0.4	(348.4)	-	(339.2)
78.	Mains - plastic (475)	(108.6)	(5.7)	0.1	0.0	(114.2)	-	(111.5)
79.	Measuring & regulating equipment (477)	(71.8)	(5.5)	-	-	(77.3)	-	(74.5)
80.	Meters (478)	(23.2)	(3.7)	1.4	(0.0)	(25.5)	-	(24.3)
81.	Regulatory Overheads	(20.0)	(4.8)	-	-	(24.8)	-	(22.4)
82.	Sub-Total	(894.9)	(60.0)	2.7	1.2	(950.9)	-	(923.8)
Union Rate Zones General Plant								
83.	Structures & improvements (482)	(14.7)	(1.5)	0.3	0.2	(15.7)	-	(15.2)
84.	Office furniture and equipment (483)	(5.7)	(0.7)	-	-	(6.4)	-	(6.0)
85.	Office equipment - computers (483)	(62.2)	(28.4)	-	-	(90.5)	-	(76.2)
86.	Transportation equipment (484)	(44.2)	(8.5)	5.5	(0.9)	(48.1)	-	(48.1)
87.	Heavy work equipment (485)	(5.0)	(1.5)	1.2	-	(5.3)	-	(5.6)
88.	Tools and work equipment (486)	(18.4)	(2.5)	-	0.0	(20.8)	-	(19.6)
89.	NGV fuel equipment (487)	(1.3)	(0.1)	-	-	(1.4)	-	(1.4)
90.	Communication equipment (488)	(8.4)	(0.9)	-	-	(9.4)	-	(8.9)
91.	Regulatory Overheads	(25.1)	(5.9)	-	-	(31.0)	-	(28.0)
92.	Sub-Total	(184.9)	(50.1)	7.0	(0.7)	(228.7)	-	(209.0)
93.	Union Rate Zones Total	(3,866.1)	(308.8)	21.7	8.9	(4,144.3)	-	(4,013.1)
94.	EGI Total	(7,396.5)	(618.3)	161.3	50.2	(7,803.2)	3.5	(7,571.2)

EGI WORKING CAPITAL COMPONENTS
MONTH END BALANCES AND AVERAGE OF MONTHLY AVERAGES
2020 ACTUAL

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
Line No.	Materials and Supplies	ABC Receivable	Customer Security Deposits	Prepaid Expenses	Balancing Gas	Gas in Storage	Working Cash Allowance	Total
	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)	(\$Millions)
1. January 1	75.1	(18.2)	(88.6)	(0.6)	59.5	629.0	23.0	679.2
2. January 31	76.7	(26.1)	(87.5)	(6.9)	59.5	534.2	23.0	572.9
3. February	76.8	(33.3)	(86.1)	(1.5)	59.5	411.2	23.0	449.6
4. March	77.2	(36.9)	(85.5)	2.6	59.5	303.0	23.0	342.8
5. April	78.9	(38.7)	(84.9)	6.3	59.5	236.7	23.0	280.7
6. May	80.9	(40.0)	(81.1)	6.6	59.5	254.7	23.0	303.5
7. June	82.3	(35.1)	(79.9)	2.7	59.5	355.6	23.0	408.2
8. July	84.0	(16.3)	(79.1)	(0.4)	59.5	459.2	23.0	529.9
9. August	85.2	(8.7)	(78.9)	1.9	59.5	541.0	23.0	622.9
10. September	86.3	(14.3)	(78.5)	8.9	59.5	623.8	23.0	708.7
11. October	88.2	(0.1)	(78.4)	9.7	59.5	752.7	23.0	854.6
12. November	89.0	(1.2)	(78.0)	7.3	59.5	735.1	23.0	834.7
13. December	87.5	(14.7)	(78.3)	(0.4)	59.5	657.3	23.0	734.0
14. Avg. of monthly avgs.	82.2	(22.3)	(81.8)	3.1	59.5	487.5	23.0	551.2

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe (EP)

Interrogatory

Reference:

Exhibit E, Tab 1, Page 10; Exhibit E, Tab 1, Schedule 4.

Preamble:

In 2020, Enbridge Gas sold a total of 2.3 PJ of short-term peak storage (legacy Union). The total 2.3 PJ was excess utility space, calculated by deducting 97.7 PJ of in-franchise utility requirement (as per the Gas Supply Plan) from the total 100 PJ of in-franchise utility storage. There was no sale of short-term peak storage from nonutility space. Total revenue from the sale of C1 Short-Term Peak Storage (Utility) in 2020 was \$2.715 million. Details of the above sales are reflected in Exhibit E, Tab 1, Schedule 4.

Question(s):

- a) Please provide a table showing the forecast and actual space and average price since 2014.
- b) Indicate how much was sold to Enbridge Gas Distribution.
- c) How does Union produce the forward year forecast? Please describe in detail.
- d) Please provide the forecast for 2021.

Response:

a)

Excess Utility Space:	2013 Board Approved Volume (PJ)	2013 Board Approved Average Annual Price (\$CAD/gj)	Actual Volume (PJ)	Actual Average Annual Price (\$CAD/gj)
2014	11.3	0.70	6.4	0.50
2015	11.3	0.70	5.0	0.99
2016	11.3	0.70	6.4	0.88
2017	11.3	0.70	6.8	0.68
2018	11.3	0.70	7.6	0.66
2019	11.3	0.70	2.9	0.73
2020	11.3	0.70	2.3	1.17

b) No space was sold to Enbridge Gas Distribution.

c) As part of the Gas Supply Planning process, Enbridge Gas determines its in-franchise storage needs using the aggregate excess methodology (EB-2019-0137: 5 Year Gas Supply Plan, page 81) and thus, the excess utility space. Excess utility space for the upcoming winter is not known until as late as the 3rd quarter, subsequent to the development of the gas supply plan.

Legacy EGD Storage RFP Timeline



Each year, EGI calculates in-franchise storage requirements for the upcoming gas year (November 1 to October 31) for the Union Rate Zones using the Aggregate Excess methodology. The calculation is completed typically in August and the amount of storage is approved with the gas supply plan by the end of September. Since 3rd party storage contracts span at least 2 **gas years** in order to allow gas to be injected prior to the winter withdrawal season, EGI is not able to offer excess utility storage space because the storage needs for the following winter are not yet known. These storage needs for the following gas year will not be known until the following August.

- d) The 2021 forecast level of excess utility short term peak storage for legacy Union is 3.0 PJ.