ONTARIO ENERGY BOARD

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

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

AFFIDAVIT OF SERVICE

I, **Tim Hesselink**, residing in the Town of Collingwood in the Province of Ontario, Canada, make **OATH AND SAY as follows**:

- 1. I am employed as the Senior Manager, Regulatory Affairs for EPCOR Natural Gas Limited Partnership ("ENGLP") and as such, I have knowledge of the matters hereinafter deposed to.
- 2. On November 4, 2021, I filed with the Ontario Energy Board (the "Board") ENGLP's application for approval to increase rates effective April 1, 2022 to recover the costs associated with meeting its obligations under the *Greenhouse Gas Pollution Pricing Act*. (the "Application").
- 3. In accordance with the November 18, 2021 Letter of Direction issued by the Board, I caused to be served by email a copy of the Notice of Hearing ("Notice") for ENGLP's Application (Exhibit "A") and the Application and evidence (Exhibit "B"). The Notice, Application and evidence were served on the following parties as requested by the Board in the Letter of Direction:
 - 1. ENGLP's Aylmer Rates proceeding (EB-2018-0336) (Exhibit "C")
 - 2. ENGLP's South Bruce Rates proceeding (EB-2018-0264) (Exhibit "C")
- 4. In accordance with the Letter of Direction, I caused a copy of the Notice, Application and evidence to be placed in a prominent place on ENGLP's website. Attached as Exhibit "D" is proof of the information posted on ENGLP's website.

5. I am informed and verily believe that due to the Covid-19 pandemic and for health and safety reasons, ENGLP's office is not currently open to the public; however, a copy of the Notice, Application and evidence will be made available to a public member upon request.

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SWORN BEFORE ME at the Town of **Collingwood** in the Province of Ontario this _____ day of **December**, 2021.

A Notary Public in and for Ontario

Tim Hesselink

THIS IS EXHIBIT 'A' referred to in the Affidavit of Tim Hesselink sworn before me this 1st day of December, 2021.

Howard

A Commissioner, etc.

EXHIBIT A

ONTARIO ENERGY BOARD NOTICE TO CUSTOMERS OF EPCOR NATURAL GAS LIMITED PARTNERSHIP

EPCOR Natural Gas Limited Partnership has applied to raise its natural gas rates effective April 1, 2022, to recover costs associated with the federal government's Greenhouse Gas Pollution Pricing Act, and to dispose of related account balances.

Learn more. Have your say.

EPCOR Natural Gas Limited Partnership has applied to the Ontario Energy Board for approval to increase its rates effective April 1, 2022, to recover the costs associated with meeting its obligations under the federal government's *Greenhouse Gas Pollution Pricing Act*. EPCOR Natural Gas Limited Partnership has also applied to dispose of the balances in the related deferral and variance accounts.

If the application is approved as filed, a typical residential customer of EPCOR Natural Gas Limited Partnership would see the following increase:

- A typical residential customer in the Aylmer service area would see an annual bill increase of \$16.87. This is composed of an annual bill increase of \$41.41 arising from the 2022 carbon charges that is reduced by a credit of \$24.54 arising from the disposition of balances in the related deferral and variance accounts.
- A typical residential customer in the South Bruce service area would see an annual bill increase of \$40.98. This is composed of an annual bill increase of \$42.12 arising from the 2022 carbon charges that is reduced by a credit of \$1.14 arising from the disposition of balances in the related deferral and variance accounts.

The Greenhouse Gas Pollution Pricing Act establishes a carbon pricing program under which a natural gas utility in Ontario, such as EPCOR Natural Gas Limited Partnership, is required to pay a carbon charge for the natural gas that it delivers to its customers. The carbon charge came into effect on April 1, 2019. The charge increased to 7.83 cents/m3 on April 1, 2021 and will increase to 9.79 cents/m3 on April 1, 2022. The costs related to emissions from the operation of EPCOR Natural Gas Limited Partnership's natural gas distribution system are also increasing.

Other customers, including businesses, may also be affected. THE ONTARIO ENERGY BOARD WILL HOLD A PUBLIC HEARING

The Ontario Energy Board (OEB) will hold a public hearing to consider the application filed by EPCOR Natural Gas Limited Partnership (ENGLP). During this hearing, which could be an oral or written hearing, we will question ENGLP on the case. We will also hear questions and arguments from individuals that have registered to participate (called intervenors) in the OEB's hearing.



The OEB is an independent and impartial public agency. We make decisions that serve the public interest. Our goal is to promote a financially viable and efficient energy sector that provides you with reliable energy services at a reasonable cost.

BE INFORMED AND HAVE YOUR SAY

You have the right to information regarding this application and to be involved in the process.

- You can review ENGLP's application on the OEB's website now
- You can file a letter with your comments, which will be considered during the hearing
- You can become an intervenor. As an intervenor you can ask questions about ENGLP's application and make arguments on whether the OEB should approve ENGLP's request. Apply by **December 6, 2021** or the hearing will go ahead without you and you will not receive any further notice of the proceeding
- At the end of the process, you can review the OEB's decision and its reasons on our website

LEARN MORE

Our file number for this case is **EB-2021-0268**. To learn more about this hearing, find instructions on how to file a letter with your comments or become an intervenor, or to access any document related to this case, please enter the file number **EB-2021-0268** on the OEB website: **www.oeb.ca/participate**. You can also phone our Public Information Centre at 1-877-632-2727 with any questions.

ORAL VS. WRITTEN HEARINGS

There are two types of OEB hearings – oral and written. ENGLP has applied for a written hearing. The OEB is considering this request. If you think an oral hearing is needed, you can write to the OEB to explain why by **December 6, 2021.**

PRIVACY

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and e-mail address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.

This rate hearing will be held under section 36 of the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B.

Ontario | Commission Energy | de l'énergie Board | de l'Ontario THIS IS EXHIBIT 'B' referred to in the Affidavit of Tim Hesselink sworn before me this 1st day of December, 2021.

tm Les 7

A Commissioner, etc.

EXHIBIT B



EPCOR Natural Gas Limited Partnership

2022 Federal Carbon Pricing Program

EB-2021-0268

Filed: November 4, 2021

EPCOR Natural Gas Limited Partnership EB-2021-0268 2022 Federal Carbon Pricing Application Page 2 of 28 Filed: November 4, 2021

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ONTARIO ENERGY BOARD

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

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

APPLICATION of EPCOR NATURAL GAS LIMITED PARTNERSHIP

Background

- 1. The Applicant is EPCOR Natural Gas Limited Partnership ("EPCOR"), an Ontario limited partnership with offices in the Town of Aylmer and Kincardine. It carries on the business of selling and distributing natural gas within the province of Ontario. EPCOR is a wholly owned indirect subsidiary of EPCOR Utilities Inc. ("EUI"). The general partner of EPCOR is EPCOR Ontario Utilities Inc., an Ontario corporation, which is a subsidiary of EUI and the sole limited partner is EPCOR Commercial Services Inc., an Alberta corporation. EPCOR was formed pursuant to a limited partnership agreement which provides that EPCOR Ontario Utilities Inc., as general partner, will control and have the full and exclusive power, authority and responsibility for the management and day-to-day operations of EPCOR. In accordance with the limited partnership agreement, EPCOR Commercial Services Inc., as limited partner, has an economic interest in the partnership but does not control or otherwise play a role in the day-to-day operations and management of EPCOR.
- 2. ENGLP provides natural gas distribution services to over 9000 customers in the Aylmer area in the Townships of Malahide and South-West Oxford; Municipalities of Bayham, Thames Centre and Central Elgin; and Norfolk County. ENGLP is also developing a greenfield natural gas distribution utility ("South Bruce") to service the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss and currently has approximately 1500 customers connected.

- 3. This application if filed by ENGLP in order to recover costs associated with the Federal Carbon Pricing Program ("FCPP") pursuant to the *Greenhouse Gas Pollution Pricing Act* (the "GGPPA"). Among other things, the GGPPA applies a charge, by volume, on certain types of fuel and combustible waste, including marketable natural gas, effective April 1, 2019 (the "Fuel Charge").
- 4. ENGLP a registered distributor pursuant to section 55(1) of the GGPPA. As a registered distributor, ENGLP is required to report volumes of fuel delivered to customers or used by the distributor and remit the Fuel Charge for such volumes on a monthly basis to the CRA. The account number assigned to ENGLP by the Canada Revenue Agency ("CRA") is 74396 8299 CT0001.
- 5. The GGPPA is composed of two key parts: (1) the Fuel Charge applied on 21 types of fuel and combustible waste, which is administered by the CRA; and (2) an output-based pricing system ("OBPS") for industrial facilities, which is administered by Environment and Climate Change Canada ("ECCC"). On September 21, 2020, the Province of Ontario announced that the federal government accepted Ontario's carbon pricing system for industrial emitters, known as the Ontario Emissions Performance Standards ("EPS") program, as an alternative to the federal OBPS. On March 29, 2021, the federal government announced that effective January 1, 2022 the EPS will replace the OBPS in Ontario, effective January 1, 2022. The GGPPA was amended on September 1, 2021 to remove Ontario from Part 2 of Schedule 1 of the GGPPA enabling the EPS to take effect in Ontario. As was the case with the OBPS, the EPS does not apply to ENGLP's facilities or assets. However, the Fuel Charge will apply to natural gas volumes sold or used by ENGLP.
- 6. ENGLP has obtained a Fuel Charge Exemption Certificate from the CRA and has provided a copy to its supplier of natural gas, Enbridge Gas Distribution Inc. ("Enbridge"). Pursuant to section 17(2) of the GGPA, this Certificate exempts ENGLP from the Fuel Charge applicable to volumes of natural gas sold by Enbridge to ENGLP.
- 7. As a result of the GGPPA, ENGLP will incur the following costs:
 - a) Incremental administration costs;

- b) Customer-related Fuel Charge costs which ENGLP will be required to pay under the GGPPA for volumes delivered by ENGLP to its residential, commercial and industrial customers who have not provided ENGLP with a Fuel Charge Exemption Certificate, along with any resulting increase to financing costs; and
- c) Facility-related costs arising from ENGLP's facilities and operation of its gas distribution system, along with any resulting increase to financing costs.

Approvals Requested

- 8. Accordingly, ENGLP applies to the Ontario Energy Board ("OEB") pursuant to section 36(1) of the OEB Act for:
 - a) an Order or Orders allowing ENGLP to charge customers a fuel charge on a volumetric basis, in the amount of the Fuel Charge required to be paid pursuant to the GGPPA, effective April 1, 2022;
 - b) an Order approving or fixing just and reasonable rates, effective April 1, 2022, to allow ENGLP to recover Facility-related costs associated with compliance with the GGPPA; and
 - c) such further Order or Orders as ENGLP may request and the OEB may deem appropriate or necessary.
 - d) a request of the disposition of the following variance account balances ("DVAs") as of December 31, 2020:
 - i. Greenhouse Gas Emissions Administration Deferral Account ("GGEADA");
 - ii. Federal Carbon Charge Customer Variance Account ("FCCCVA"); and
 - iii. Federal Carbon Charge Facility Variance Account ("FCCFVA").
- 9. EPCOR respectfully requests issuance of a decision and order in this proceeding by March 15, 2022, to ensure the implementation of the 2022 rates in advance of the effective date. In the event that the OEB does not issue a decision and rate order by March 15, 2022, EPCOR requests that the OEB issue an interim rate order declaring the current distribution rates as interim until the decided implementation date of the approved 2021 distribution rates.

- 10. This application is supported by written evidence filed with this application, which may be amended from time to time.
- 11. The persons affected by this application include all of ENGLP's residential, commercial and industrial customers.
- 12. EPCOR requests that the OEB's review of this application proceed by way of written hearing in English.

Address for Service:

13. ENGLP requests that copies of all documents filed with the OEB in connection with this proceeding be served as follows:

Tim Hesselink Senior Manager, Regulatory Affairs, Ontario EPCOR Utilities Inc. 43 Stewart Road Collingwood, ON, L9Y 3M7

Telephone:(705) 445-1800 ext. 2274E-Mail:Thesselink@epcor.com

Daniela O'Callaghan Legal Counsel EPCOR Utilities Inc. 2000 – 10423 101 Street NW Edmonton, Alberta T5H 0E8

Telephone:(780) 412-4081E-Mail:DOCallaghan@epcor.com

Dated at Collingwood, Ontario this 4th day of November, 2021.

EPCOR Natural Gas Limited Partnership EB-2021-0268 2022 Federal Carbon Pricing Application Page 7 of 28 Filed: November 4, 2021

14. The evidence filed in support of this application does not include any personal information (as that phrase is defined in the Freedom of Information and Protection of Privacy Act), that is not otherwise redacted in accordance with rule 9A of the OEB's Rules of Practice and Procedure.

> **EPCOR NATURAL GAS LIMITED PARTNERSHIP** by its general partner **EPCOR ONTARIO UTILITIES INC.**

TIAN

Tim Hesselink, Senior Manager, Regulatory Affairs

OVERVIEW

- 15. The purpose of this evidence is to summarize EPCOR Natural Gas Limited Partnership's ("ENGLP") application for just and reasonable rates for its Aylmer and South Bruce operations to recover the costs associated with the federal *Greenhouse Gas Pollution Pricing Act*, S.C. 2019, c. 12, s. 186 (the "GGPPA") as a pass-through to customers.
- 16. The evidence is organized as follows:
 - a) Overview
 - b) Anticipated Costs of Compliance
 - c) Cost Recovery
 - d) Bill Impacts
- 17. ENGLP was last approved for Federal Carbon Pricing Plan (FCPP) rates effective April 1, 2021, which included the final disposition of December 2019 DVA balances as part of combined hearing EB-2020-0076 and EB-2020-0231.
- 18. As Aylmer and South Bruce have separate tariffs and rate structures, costs and cost recovery have been presented separately including disposition of deferral and variance accounts.

Background: the Greenhouse Gas Pollution Pricing Act

- 19. The GGPPA received Royal Assent on June 21, 2018. The purpose of the GGPPA is to impose a carbon pricing mechanism in provinces or territories where no such carbon pricing mechanism (e.g., a cap-and-trade system or carbon tax) has been put into place or where such mechanism does not meet national criteria. On October 23, 2018, the Government of Canada deemed Ontario to be a "listed province" that is subject to the GGPPA's carbon pricing mechanism.
- 20. The federal carbon pricing scheme implemented by the GGPPA features two main elements:
 - a) A charge applied to fossil fuels, generally paid by registered distributors (fuel producers and distributors), as set out in Part 1 of the GGPPA (the "Fuel Charge"); and
 - b) For larger industrial facilities, an output-based pricing system for emissions- intensive tradeexposed ("EITE") industries as set out in Part 2 of the GGPPA (the "OBPS"). The OBPS

applies to facilities emitting 50,000 tonnes of carbon dioxide equivalent ("CO2e") per year or more, with the ability for smaller EITE facilities that emit 10,000 CO2e per year or more to voluntarily opt-in to the system over time.

21. The amount of the Fuel Charge for marketable natural gas is established under Schedule 2 of the GGPPA. The Fuel Charge increases annually until 2022, as set out below:

| Year | Charge Cost \$ per m ³ |
|------|-----------------------------------|
| 2019 | 0.0391 |
| 2020 | 0.0587 |
| 2021 | 0.0783 |
| 2022 | 0.0979 |

- 22. Subsection 55(1) of the GGPPA requires that all persons register with the Canada Revenue Agency (the "CRA") for the purposes of Part 1 of the GGPPA (i.e., the Fuel Charge) if, inter alia:
 - a) The person delivers marketable natural gas or non-marketable natural gas to another person in a listed province; or
 - b) The person measures another person's consumption or usage, in a listed province, of marketable natural gas and the measurement is done on a regular basis and for the purpose of billing the other person or providing the other person's billing information to a third party, and the marketable natural gas is delivered by way of a distribution system.
- 23. "Marketable natural gas" is defined in section 3 of the GGPPA as "natural gas that consists of at least 90% methane and that meets the specifications for pipeline transport and sale for general distribution to the public."
- 24. Consequently, ENGLP was required to register with the CRA as a distributor of marketable natural gas, and did so on February 27, 2019. ENGLP's CRA account number under the program is 74396 8299 CT0001.
- 25. Subsection 171(1) of the GGPPA requires that persons responsible for a "covered facility" register with Environment and Climate Change Canada ("ECCC") for the purposes of Part 2 of the GGPPA

(i.e., the OBPS).

- 26. On September 21, 2020, the Province of Ontario announced that the federal government accepted Ontario's Carbon pricing system of industrial emitters, known as the Ontario Emissions Performance Standards program (EPS), as an alternative to the federal OBPS. On March 29, 2021, the federal government announced that effective January 1, 2022 the Ontario EPS will replace the federal OBPS. The GGPPA was amended on September 1, 2021 to remove Ontario from Part 2 of Schedule 1 of the GGPPA, enabling EPS to take effect in Ontario as of January 1, 2022.
- 27. Unlike Enbridge Gas Distribution Inc. ("Enbridge"), ENGLP was not required to register as an "emitter" pursuant to section 57(1) of the GGPPA because ENGLP is not a person responsible for a "covered facility" (in Enbridge's case, its "covered facilities" include its transmission system and storage compressor stations). ENGLP also confirmed with ECCC that it was not required to register as an "emitter" because its facility emissions are below 10,000 tonnes of CO2e.
- 28. Further EPCOR will not be subject to the EPS as it does not meet the criteria under section 2 of the *Emissions Performance Standards Regulation* (O. Reg. 241/19) (the "EPS Regulation") which are:
 - i. the owner or operator of the facility was required to report the facility's greenhouse gas emissions for 2014 or for any subsequent year
 - ii. the facility reported 50,000 tonnes or more of CO2e emissions in or or more reporting year from 2014 onward
 - iii. the primary activity at the facility is an industrial activity listed in paragraphs 1 to 38 of Schedule 2 of the EPS Regulation or the owner or operator of the facility has registered the facility under Part II of the GGPPA.

ENGLP's obligations under the GGPPA

29. As a registered distributor, ENGLP is required under section 17(1) of the GGPPA to pay the Fuel Charge for volumes of natural gas delivered to its customers. Additionally, pursuant to section 18(1) of the GGPPA, ENGLP is required to pay the Fuel Charge for volumes of natural gas that it uses. These volumes delivered or used must be reported - and the corresponding Fuel Charge must be remitted – to the CRA on a monthly basis.

- 30. Ordinarily, Enbridge would be required to report and remit the Fuel Charge for volumes of natural gas sold to ENGLP. However, subsection 17(2) of the GGPPA deems that the Fuel Charge is not payable if the fuel is delivered to a person who holds an "exemption certificate" issued by the CRA pursuant to section 36(1) of the GGPPA (an "Exemption Certificate"). ENGLP obtained an Exemption Certificate as a registered distributor and has provided a copy to Enbridge, in accordance with the GGPPA.
- 31. Accordingly, ENGLP, in its capacity as a registered distributor, will be required to remit the 2021 Fuel Charge rate of \$0.0979/m³ of natural gas delivered to customers unless a customer provides ENGLP with an Exemption Certificate.
- 32. ENGLP will also be required to remit the 2022 Fuel Charge for natural gas used by ENGLP for its office building and natural gas vehicle ("NGV") fleet in the Aylmer service area.

AYLMER OPERATIONS Customer Charges and Volumes

- 33. ENGLP forecasts the 2022 customer related costs (for the period from April 1, 2022 to March 31, 2023) associated with the GGPPA for its Aylmer operations to be \$2,975,107. ENGLP will present these charges as a separate line item on customers' bills. ENGLP proposes a charge of 9.79 cents/m³ over volumes from April 1, 2022 to March 31, 2023.
- 34. ENGLP is forecasting total customer volumes from April 1, 2022 to March 31, 2023 of 28,601,377 m³. The volume projections are based on 2020 actual data and are consistent with the 2022 Aylmer IRM filing (EB-2021-0215). ENGLP's current customer related volume forecast includes a reduction (80%) for volumes delivered to commercial greenhouse operators based on the confirmed relief under the GGPPA for these customers. To date, ENGLP has received Exemption Certificates from six such customers. The resulting forecast for these exempt facilities is 94,098 m³ resulting in an effective volume of 18,820m³.

| Line No. | Customer-Related Costs | Volumes (m³) | FCC Rate (¢/m ³) | Cost Forecast (\$) |
|----------|-----------------------------------|-----------------|---------------------------------|-----------------------|
| 1 | Customer-Related Forecast Volume | 28,507,279 | 9.79 | \$2,790,863 |
| 2 | Eligible Greenhouse Volumes | 94,098 | | |
| 3 | Effective Volumes (20%) | 18,820 | 9.79 | \$184,244 |
| 4 | Total Customer-Related Costs (\$) | | | \$2,975,107 |

35. ENGLP has received an Exemption Certificate for a Rate 6 customer (IGPC) and the volumes for this customer have been excluded from the customer related volume forecast.

Facility Costs and Volumes

- 36. For the period of April 1 2022 to March 31, 2023, ENGLP forecasts the costs associated with company-use volumes for ENGLP's buildings and NGV fleet to be \$3,056 for its Aylmer operations.
- 37. ENGLP proposes a volumetric charge of 0.0034 cents/m³ for all rate classes from April 1, 2022 to March 31, 2023 for all rate classes, including Rate 6. The costs associated with these company-use volumes will be included in delivery charges on customers' bills.
- 38. ENGLP is forecasting total facility volumes from April 1, 2022 to March 31, 2023 of 88,600,394 m³. The volume projections are based on 2020 actual data and are consistent with the 2022 Aylmer IRM filing (EB-2021-0215). ENGLP is including rate 6 consumption in this projection the facility charge is applicable to all rate classes as there is no exemption.
- 39. It remains unclear to ENGLP whether unaccounted-for gas ("UFG") is considered by the CRA to be "used" by a distributor. As was the case for its 2021 application, ENGLP has included UFG in its calculations, albeit at 0.0%, in the event that the CRA provides further guidance on UFG or otherwise requires ENGLP to report UFG in fuel volumes "used" by ENGLP as Company Use Volumes and remit the Fuel Charge accordingly. That is, for the purposes of its 2022 application, ENGLP continues to assume UFG to be zero.

| Line No1. | Particulars | Forecast Volume (m ³) |
|-----------|--|-----------------------------------|
| 1 | Unaccounted For Gas (0%) | - |
| 2 | Company Use Buildings | 10,833 |
| 3 | Company Use NGV | <u>20,381</u> |
| 4 | Total Facility-Related Volume | 31,214 |
| 5 | FCPP Rate (¢/m³) | 9.79 |
| 6 | Total Projected Facility-Related Costs (\$) | 3,056 |
| 7 | Forecast Recovery Volumes (m ³) | 88,600,394 |
| 8 | Proposed Facility Carbon Charge - ¢/m ³ | 0.0034 |

Deferral and Variance Accounts

Federal Carbon Charge - Customer Variance Account (FCCCVA)

40. The purpose of the FCCCVA is to record the variances between actual customer carbon costs and customer carbon costs recovered in rates for distribution volumes delivered by ENGLP effective April 1, 2019. The calculation of the total balance requested for disposition is summarized in Table 1 below and additional details are provided in the continuity schedule in Appendix A. ENGLP is requesting disposition of balances as of December 31, 2020. Carrying charges have been calculated using OEB prescribed interest rates up until the proposed date of disposition (March 31, 2022).

Table 1 - Projected Total FCCCVA Amount for Disposal

| Accou | int | Balance Dec 31, 2020 | 2020 Carrying Charges | 2021 Carrying Charges | 2022 Carrying Charges | Balance Mar 31, 2022 |
|-------|-----|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------|
| FCCC | VA | \$55,449 | \$200 | \$316 | \$79 | \$56,044 |

41. ENGLP proposes to recover these costs from customers in rate classes 1-5, due to the exemption filed by the rate 6 customer. The FCCCVA balances are proposed to be recovered through the implementation of a twelve-month volumetric rate rider commencing on April 1, 2022, calculated based on projected customer volumes. The calculation of the proposed rate rider is shown in Table 2 below.

Table 2 - Calculation of Proposed Aylmer FCCCVA Rate Rider

| | | A | В | С | D |
|---|--------------------------|----------------|------------|------------|---------------------------------------|
| | | Unit | Row Sum | Rates 1-5 | Eligible Greenhouse ^(*) |
| 1 | Consumption | m ³ | 28,544,918 | 28,526,098 | 18,820 |
| 2 | Allocation for Rates 1-5 | % | 100% | 99.9% | 0.1% |
| 3 | Sum | \$ | 56,044 | 56,007 | 37 |
| 4 | cents/m ³ | | | 0.1965 | 0.1965 |

**Note that volumes related to eligible greenhouse customers are only subject to 20% of the natural

gas volumes used by eligible greenhouses, reducing their effective Federal Carbon Charge rate. The volumes presented on the table above are the 20% effective volumes.

Federal Carbon Charge - Facility Variance Account (FCCFVA)

42. The purpose of the FCCFVA is to record the variances between actual facility carbon costs and facility carbon costs recovered in rates effective April 1, 2019. The calculation of the total balance requested for disposition is summarized in Table 3 below and additional details are provided in the continuity schedule in Appendix A. ENGLP is requesting disposition of balances as of December 31, 2020. Carrying charges have been calculated using OEB prescribed interest rates up until the proposed date of disposition (March 31, 2022).

 Table 3 - Projected Total FCCFVA Amount for Disposal

| Account | Balance Dec 31, 2020 | 2020 Carrying Charges | 2021 Carrying Charges | 2022 Carrying Charges | Balance Mar 31, 2022 |
|---------|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------|
| FCCFVA | \$3,021 | \$10 | \$17 | \$4 | \$3,053 |

43. ENGLP proposes to recover the costs related to the above account from customers in rate classes 1-6. Due to the low dollar amount requested for disposition, the FCCFVA balances are proposed to be recovered through the implementation of a twelve-month fixed charge rate rider commencing on April 1, 2022, based on projected customer volumes. The calculation of the proposed rate rider is shown in Table 4 below.

| | | A | В |
|---|---------------------------|-------|-----------|
| | | Unit | Rates 1-6 |
| 1 | Customer Count | Count | 9,608 |
| 2 | Allocation for Rates 1-6 | % | 100% |
| 3 | Sum | \$ | 3,053 |
| 4 | \$ per customer per month | | 0.03 |

Greenhouse Gas Emissions Administration Deferral Account (GGEADA)

44. The purpose of the GGEADA is to record the administrative costs associated with the impacts of the GGPPPA, as well as any other federal and/or provincial regulations related to GHG emission requirements for ENGLP's Aylmer operation effective January 1, 2019. The calculation of the total balance requested for disposition is summarized in Table 4 below and additional details are provided in the continuity schedule in Appendix A. ENGLP is requesting disposition of balances as of December 31, 2020. Carrying charges have been calculated using OEB prescribed interest rates up until the proposed date of disposition (March 31, 2022).

Table 5 - Projected Total GGEADA Amount for Disposal

| Account | Balance Dec 31, 2020 | 2020 Carrying Charges | 2021 Carrying Charges | 2022 Carrying Charges | Balance Mar 31, 2022 |
|---------|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------|
| GGEADA | \$3,206 | \$14 | \$18 | \$5 | \$3,243 |

45. ENGLP proposes to recover the costs related to the above proceeding from customers in rate classes 1-6. When determining the appropriate allocation method, ENGLP reviewed both a variable rate and fixed rate allocation. As the amounts in the account are applicable to all customers, the fixed rate methodology was chosen as the variable rate created an over allocation to the rate 6 customer. The FCCCVA balances are proposed to be recovered through the implementation of a twelve-month fixed charge rate rider commencing on April 1, 2021, based on 2019 customer volumes. The calculation of the proposed rate rider is shown in Table 6 below.

Table 6 - Calculation of Proposed Aylmer GGEADA Rate Rider

| | | A | В |
|---|---------------------------|-------|-----------|
| | | Unit | Rates 1-6 |
| 1 | Customer Count | Count | 9,608 |
| 2 | Allocation for Rates 1-6 | % | 100% |
| 3 | Sum | \$ | 3,243 |
| 4 | \$ per customer per month | | 0.03 |

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SOUTH BRUCE OPERATIONS Customer Charges and Volumes

- 46. ENGLP forecasts the 2022 customer related costs (for the period from April1, 2022 to March 31, 2023) associated with the GGPPA for its South Bruce operations to be \$2,734,997. ENGLP will present these charges as a separate line item on customers' bills. ENGLP proposes a charge of 9.79 cents/m3 over volumes from April 1, 2022 to March 31, 2023.
- 47. ENGLP is forecasting total customer volumes from April 1, 2022 to March 31, 2023 of 31,082,271m³ for South Bruce operations. The volume projections are based on forecast projections included in ENGLP's annual Gas Supply Plan update (EB-2021-0146) as historical growth will not adequately capture additional connections expected in 2021 and 2022 due to the ongoing South Bruce project. ENGLP's current customer related volume forecast includes a reduction (80%) for volumes delivered to commercial greenhouse operators based on the confirmed relief under the GGPPA for these customers. To date, ENGLP has received Exemption Certificates from six such customers. The resulting forecast for these exempt facilities is 3,932,042m3 resulting in an effective volume of 786,408m³.

| Line No. | Customer-Related Costs | Volumes (m³) | FCC Rate (¢/m³) | Cost Forecast (\$) |
|----------|-----------------------------------|-----------------|--------------------|--------------------------|
| 1 | Customer-Related Forecast Volume | 27,150,229 | 9.79 | \$2,658,007 |
| 2 | Eligible Greenhouse Volumes | 3,932,042 | | |
| 3 | Effective Volumes (20%) | 786,408 | 9.79 | \$76,989 |
| 4 | Total Customer-Related Costs (\$) | | | \$2,734,997 |

Facility Costs and Volumes

48. ENGLP South Bruce is not expecting any costs associated with company-use volumes for ENGLP's buildings and NGV fleet and as a result, is not requesting a Facility Carbon Charge as part of this application for the South Bruce operations.

Deferral and Variance Accounts

Federal Carbon Charge - Customer Variance Account (FCCCVA)

49. The purpose of the FCCCVA is to record the variances between actual customer carbon costs and customer carbon costs recovered in rates for distribution volumes delivered by ENGLP effective April 1, 2019. The calculation of the total balance requested for disposition is summarized in Table 1 below and additional details are provided in the continuity schedule in Appendix A. Carrying charges have been calculated using OEB prescribed interest rates.

Table 7 - Projected Total FCCCVA Amount for Disposal

| Account | Balance Dec 31, 2020 | 2020 Carrying Charges | 2021 Carrying Charges | 2022 Carrying Charges | Balance Mar 31, 2022 |
|---------|----------------------------|--------------------------|-----------------------------|-----------------------------|-------------------------|
| FCCCVA | -\$14,685 | -\$9 | -\$84 | -\$21 | -\$14,799 |

50. ENGLP proposes to disperse these amounts to customers in all rate classes (i.e. payable to customers). The FCCCVA balances are proposed to be paid through the implementation of a twelve-month volumetric rate rider commencing on April 1, 2022, calculated based on projected customer volumes. The calculation of the proposed rate rider is shown in Table 2 below.

Table 8 - Calculation of Proposed South Bruce FCCCVA Rate Rider

| | | Α | В | С | D |
|---|----------------------|----------------|------------|------------|---------------------------------------|
| | | Unit | Row Sum | Rates 1-16 | Eligible Greenhouse ^(*) |
| 1 | Consumption | m ³ | 27,936,637 | 27,150,229 | 786,408 |
| 2 | Rates 1-16 | % | 100% | 97.2% | 2.8% |
| 3 | Sum | \$ | -14,799 | -14,382 | -417 |
| 4 | cents/m ³ | | | -0.0530 | -0.0530 |

**Note that volumes related to eligible greenhouse customers are only subject to 20% of the natural gas volumes used by eligible greenhouses, reducing their effective Federal Carbon Charge rate. The volumes presented on the table above are the 20% effective volumes.

Federal Carbon Charge - Facility Variance Account (FCCFVA)

51. As the South Bruce operations do not incur any facility related costs, there is no request for disposition as part of this filing.

Greenhouse Gas Emissions Administration Deferral Account (GGEADA)

52. As noted in the March 11, 2021 Decision and Order (EB-2020-0076/EB-2020-0231), OEB staff supported ENGLP's intention to allocate FCPP administration costs in future years between the Aylmer and Southern Bruce operations based on customer counts, and noted that this will reduce the bill impact, by spreading this cost across more customers. ENGLP has begun to allocate GGEADA costs across South Bruce and Aylmer beginning fall 2020 (consistent with initial South Connections). Based on the allocations included in the Appendix A DVA schedules, there is no request for disposition for 2020 balances due to immateriality (claim of less than \$10). ENGLP will continue to allocate relevant costs between rate zones for future claims as additional South Bruce customers connect.

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Upstream Costs (Aylmer and South Bruce)

- 53. Enbridge's Facility Carbon Charge costs are not currently included in ENGLP's transportation charges included in its distribution rates, as these costs were not included in the determination of ENGLP's Purchased Gas Transportation Variance Account ("PGTVA") reference price. Therefore, such costs will be captured in the PGTVA for customers in Rate 1 through 5. All costs, charges and fees incurred by ENGLP related to gas supplied by Enbridge to ENGLP's system for the customer in Rate 6 are a direct pass through to that customer and, therefore, any such increased costs will be invoiced to IGPC on a monthly basis, equal to the amount charged by Enbridge. Similarly, Enbridge's Facility Carbon Charge costs are also not currently included in ENGLP South Bruce's Upstream charges included in its distribution rates. Therefore, such costs will be captured in the Storage and Transportation Variance Account for Rate 1, 6, and 11, as well as the Storage and Transportation Variance Account for Rate 16.
- 54. Any impacts to commodity costs as a result of the GGPPA will be recorded in the Purchased Gas Commodity Variance Account ("PGCVA") through the application of the rate differential between the current PGCVA reference price and the actual unit cost of the purchases to the actual volumes purchased. The PGCVA reference price will be adjusted through ENGLP's Quarterly Rate Adjustment Mechanism applications for both Aylmer and South Bruce.

Customer Communications

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

Bill Impacts

- 56. At the time of filing of this application, ENGLP also has two other active rate proceedings:
 - EB-2021-0215 South Bruce IRM rates effective January 1, 2022
 - EB-2021-0216 Aylmer IRM rates effective January 1, 2022
- 57. As a result, rate impacts are presented based on approved rates as of October 1, 2021 and proposed rate schedules have not been included. A table of rate adjustments by rate class can be found below:

Table 9 - Current and Proposed Federal Carbon Pricing Plan Rates

| Aylmer Rates 1-5 | Туре | Current Rate | Proposed Rate | Variance | Variance (%) |
|------------------------|--------------------------|-----------------|------------------|----------|-----------------|
| Federal Carbon Charge | cents per m ³ | 7.83 | 9.79 | 1.96 | 25% |
| Facility Carbon Charge | cents per m ³ | 0.0052 | 0.0034 | (0.0018) | -35% |
| FCCCVA Recovery | cents per m ³ | 0.9416 | 0.1965 | (0.7451) | -79% |
| FCCFVA Recovery | \$ per month | 0.01 | 0.03 | 0.02 | 200% |
| GGEADA Recovery | \$ per month | 0.78 | 0.03 | (0.75) | -96% |

| Aylmer Rate 6 | Туре | Current Rate | Proposed Rate | Variance | Variance (%) |
|------------------------|--------------------------|-----------------|------------------|----------|-----------------|
| Facility Carbon Charge | cents per m ³ | 0.0052 | 0.0034 | (0.0018) | -35% |
| FCCFVA Recovery | \$ per month | 0.01 | 0.03 | 0.02 | 200% |
| GGEADA Recovery | \$ per month | 0.78 | 0.03 | (0.75) | -96% |

| South Bruce (All rates) | Туре | Current Rate | Proposed Rate | Variance | Variance (%) |
|-------------------------|--------------------------|-----------------|------------------|----------|-----------------|
| Federal Carbon Charge | cents per m ³ | 7.83 | 9.79 | 1.96 | 25% |
| FCCCVA Recovery | cents per m ³ | - | (0.0530) | (0.0530) | N/A |

*Aylmer Rate 6 assumes an eligible certificate of exception has been filed

**Note that volumes related to eligible greenhouse customers are only subject to 20% of the natural gas volumes used by eligible greenhouses, reducing their effective Federal Carbon Charge rate.

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| Rate Class | Average Customer Annual Billings | Average Customer Annual Volume (m3) | Change in FCC Impact \$/m3 0.01960 | Change in FFC Impact \$/m3 -0.00002 | Change in FCCCVA \$/m3 -0.00745 | Change in FCCFVA \$/month 0.02 | Change in GGEADA \$/month -0.75 | Total Annual Customer Impact | % Variance |
|---|---|---|--|---|---|--|---|---------------------------------------|---------------|
| RATE 1 - Residential | \$1,060 | 2,113 | \$41.41 | (\$0.04) | (\$15.74) | \$0.24 | (\$9.00) | \$16.87 | 1.6% |
| RATE 1 - Commercial | \$4,669 | 11,854 | \$232.34 | (\$0.21) | (\$88.32) | \$0.24 | (\$9.00) | \$135.04 | 2.9% |
| RATE 1 - Industrial | \$12,551 | 33,574 | \$658.05 | (\$0.60) | (\$250.16) | \$0.24 | (\$9.00) | \$398.53 | 3.2% |
| | | | | | | | | | |
| RATE 2 - Seasonal Service - Apr to Oct | \$5,648 | 15,792 | \$309.52 | (\$0.28) | (\$117.67) | \$0.14 | (\$5.25) | \$186.46 | 3.3% |
| RATE 2 - Seasonal Service - Nov to Mar | <u>\$4,113</u> | <u>9,737</u> | <u>\$190.85</u> | <u>(\$0.18)</u> | <u>(\$72.55)</u> | <u>\$0.10</u> | <u>(\$3.75)</u> | <u>\$114.47</u> | 2.8% |
| RATE 2 - Seasonal Service - Annual | \$9,762 | 25,529 | \$500.37 | (\$0.46) | (\$190.22) | \$0.24 | (\$9.00) | \$300.93 | 3.1% |
| RATE 3 - Large Volume Contract Rate | \$89,052 | 257,421 | \$5,045 | (\$4.63) | (\$1,918) | \$0.24 | (\$9.00) | \$3,114.01 | 3.5% |
| RATE 4 - GS Peaking - Apr to Dec | \$16,653 | 44,132 | \$864.99 | (\$0.79) | (\$328.83) | \$0.18 | (\$6.75) | \$528.80 | 3.2% |
| RATE 4 - GS Peaking - Jan to Mar | <u>\$2,459</u> | <u>5,328</u> | <u>\$104.43</u> | (\$0.10) | (\$39.70) | <u>\$0.06</u> | <u>(\$2.25)</u> | \$62.44 | 2.5% |
| RATE 4 - GS Peaking - Annual | \$19,113 | 49,460 | \$969.42 | (\$0.89) | (\$368.53) | \$0.24 | (\$9.00) | \$591.24 | 3.1% |
| RATE 5 - Interruptible Peaking Contract Rate | \$64,178 | 198,871 | \$3,898 | (\$3.58) | (\$1,482) | \$0.24 | (\$9.00) | \$2,403.75 | 3.7% |
| RATE 6 - IGPC Aylmer Ethanol Production Facility | \$759,313 | 62,382,456 | N/A | (\$1,122.88) | N/A | \$0.24 | (\$9.00) | (\$1,131.64) | -0.1% |

TABLE 10 - AYLMER Bill Impacts

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| Rate Class | Average Customer Annual Billings | Average Customer Annual Volume (m3) | Change in FCC Impact \$/m3 0.01960 | Change in FCCCVA \$/m3 -0.00053 | Total Annual Customer Impact | % Variance |
|---|---|---|---|--|---------------------------------------|---------------|
| Rate 1 Existing Residential | \$1,492 | 2,149 | \$42.12 | (\$1.14) | \$40.98 | 2.7% |
| Rate 1 New Residential | \$1,446 | 2,066 | \$40.49 | (\$1.09) | \$39.40 | 2.7% |
| Rate 1 Small Commercial | \$2,864 | 4,693 | \$91.98 | (\$2.49) | \$89.50 | 3.1% |
| Rate 1 Small Agricultural | \$2,878 | 4,720 | \$92.51 | (\$2.50) | \$90.01 | 3.1% |
| Rate 6 Medium Commercial Rate 6 Large Commercial | \$16,005 \$42,002 | 26,933 75,685 | \$527.89 \$1,483.43 | (\$14.27) (\$40.09) | \$513.62 \$1,443.33 | 3.2% 3.4% |
| Rate 11 Sample Dryer 1 Rate 11 Sample Dryer 2 | \$42,682 \$123,097 | 101,499 338,332 | \$1,989.39 \$6,631.30 | (\$53.77) (\$179.22) | \$1,935.62 \$6,452.08 | 4.5% 5.2% |
| Rate 16 Contracted Demand | \$894,989 | 600,000 | \$11,760 | (\$318) | \$11,442 | 1.3% |

TABLE 11 - SOUTH BRUCE Bill Impacts

EPCOR Natural Gas Limited Partnership EB-2021-0268 2022 Federal Carbon Pricing Application Page 24 of 28 Filed: November 4, 2021

APPENDIX A - Auditor's Report



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ACCOUNTANT'S REPORT ON APPLYING SPECIFIED AUDITING PROCEDURES IN RESPECT OF THE SPECIFIC DEFERRAL ACCOUNT BALANCES

To: EPCOR Natural Gas Limited Partnership

As specifically agreed, we have performed the auditing procedures described in appendix A over the deferral account schedule for Federal Carbon Charge, to assist EPCOR Natural Gas Limited Partnership (the "Company") to comply with the requirements of the Ontario Energy Board (OEB) for the period from January 1, 2020 to December 31, 2020.

This engagement to apply agreed-upon auditing procedures was performed in accordance with Canadian Standards on Related Services 9100, Reports on the Results of Applying Specified Auditing Procedures. We make no representation regarding the sufficiency of the procedures described in Appendix A either for the purpose for which this report has been requested or for any other purpose.

The procedures in Appendix A do not constitute an audit of the deferral account schedule and, therefore, we express no opinion on the information in the schedule for the period from January 1, 2020 to December 31, 2020. Had we performed additional procedures other matters might have come to our attention that we would have reported to you.

This letter is for use in assessing the Company's deferral account activity for Federal Carbon Charge from January 1, 2020 to December 31, 2020 and is not intended to be and should not be used for any other purpose.

Chartered Professional Accountants, Licensed Public Accountants

London, Ontario November 2, 2021



Tel: 519-432-5534 Fax: 519-432-6544 www.bdo.ca BDO Canada LLP 633 Colborne St., Suite 230 London ON N6B 2V3

APPENDIX A

1. We obtained the deferral account activity for Federal Carbon Charge from January 1, 2020 to December 31, 2020 and recalculated the schedule to ensure its mathematical accuracy.

2. For the Greenhouse Gas Emissions Administration Deferral Account (GGEADA) expenses, we obtained invoices for sampled months of activity to ensure that the amount of cost claimed is correct.

3. For the federal fuel charge amounts, we obtained the CRA remittances for each month to ensure the amount claimed is correct.

4. For the amounts received via billing, we agreed each claim to the Federal carbon charge Consumption Summary Report as prepared by EPCOR based on the consumption data collected monthly from customers. We validated a selection of the data in the consumption report by agreeing it to individual customer invoices.

| | Opening | Jan-20 | Feb-20 | Mar-20 | Apr-20 | May-20 | Jun-20 | Jul-20 | Aug-20 | Sep-20 | Oct-20 | Nov-20 | Dec-20 |
|---|---------|-----------|----------------|----------------|----------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-----------|
| OEB Prescribed Interest rate | | 2.18% | 2.18% | 2.18% | 2.18% | 2.18% | 2.18% | 0.57% | 0.57% | 0.57% | 0.57% | 0.57% | 0.57% |
| 2019 Amounts approved for disposal | | | | | | | | | | | | | |
| Federal Carbon Charge - Customer Variance Account (FCCCVA) | | | | | | | | | | | | | |
| Cumulative Monthly Total | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 | 287,851 |
| Monthly Interest | | 523 | 523 | 523 | 523 | 523 | 523 | 137 | 137 | 137 | 137 | 137 | 137 |
| Cumulative Interest | 3,516 | 4,039 | 4,562 | 5,085 | 5,608 | 6,131 | 6,654 | 6,790 | 6,927 | 7,064 | 7,201 | 7,337 | 7,474 |
| Federal Carbon Charge - Facility Variance Account (FCCFVA) | | | | | | | | | | | | | |
| Cumulative Monthly Total | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 | 1,457 |
| Monthly Interest | | 3 | 3 | 3 | 3 | 3 | 3 | 1 | 1 | 1 | 1 | 1 | 1 |
| Cumulative Interest | 11 | 14 | 17 | 19 | 22 | 25 | 27 | 28 | 29 | 29 | 30 | 31 | 31 |
| Greenhouse Gas Emissions Administration Deferral Account (GGEADA) | | | | | | | | | | | | | |
| Cumulative Monthly Total | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 | 84,209 |
| Monthly Interest | 920 | 153 | 153 | 153 | 153 | 153 | 153 | 40 | 40 | 40 | 40 | 40 | 40 |
| Cumulative Interest | 920 | 1,073 | 1,226 | 1,379 | 1,531 | 1,684 | 1,837 | 1,877 | 1,917 | 1,957 | 1,997 | 2,037 | 2,077 |
| 2020 Schedule | | | | | | | | | | | | | |
| Payments to CRA | | | | | | | | | | | | | |
| Aylmer - Customers | | 172,999 | 159,136 | 137,421 | 163,031 | 124,948 | 55,549 | 38,461 | 40,279 | 41,856 | 81,861 | 181,371 | 237,206 |
| Aylmer - Facility | | 212 | 216 | 218 | 331 | 333 | 334 | 335 | 335 | 336 | 337 | 339 | 344 |
| Southern Bruce - Customers | _ | - | - | - | - | - | - | - | - | 56 | 192 | 330 | 4,140 |
| Sub-Total | | 173,211 | 159,352 | 137,639 | 163,362 | 125,281 | 55,883 | 38,795 | 40,614 | 42,247 | 82,390 | 182,040 | 241,690 |
| Per CRA Remittance Difference | - | 173,211 | 159,352 | 137,639 | 163,362 | 125,281 | 55,883 | 38,795 0 | 40,614 | 42,247 (0) | 82,390 | 182,040 | 241,690 |
| | | | - | - | | - | (0) | 0 | - | (0) | 0 | (0) | 0 |
| Volumes Customer volume (Aylmer) | | 4,419,023 | 4,064,004 | 3,508,183 | 2,770,634 | 2,120,631 | 942,409 | 651,276 | 682,207 | 708,786 | 1,389,855 | 3,085,052 | 4,036,116 |
| Customer volume (Southern Bruce) | | 4,415,025 | 4,004,004 | 5,508,185 | 2,770,034 | 2,120,031 | 542,405 | - | - 082,207 | - | 1,365,633 | 3,083,032 | 4,030,110 |
| Exempt customer volume (Avlmer) | | 27,457 | 29,854 | 32,096 | 33,592 | 39,749 | 19,562 | 19,654 | 19,880 | 21,275 | 23,572 | 23,698 | 24,383 |
| Exempt customer volume (Southern Bruce) | | | | - | - | - | | | | 4,780 | 16,371 | 28,073 | 36,547 |
| Facility volume (Aylmer) | | 5,434 | 5,514 | 5,579 | 5,642 | 5,681 | 5,691 | 5,703 | 5,715 | 5,721 | 5,738 | 5,781 | 5,862 |
| | | 4,451,915 | 4,099,372 | 3,545,858 | 2,809,868 | 2,166,061 | 967,661 | 676,634 | 707,802 | 740,562 | 1,435,536 | 3,142,603 | 4,166,122 |
| Aylmer DTY R1-R5 volumes | | 4,531,370 | 4,196,568 | 3,613,252 | 2,835,772 | 2,153,307 | 893,382 | 587,277 | 617,357 | 646,224 | 1,353,849 | 3,105,330 | 4,118,201 |
| Customer charge | | 172,784 | 158,903 | 137,170 | 162,636 | 124,481 | 55,319 | 38,230 | 40,046 | 41,606 | 81,585 | 181,093 | 240,631 |
| Exempt customer charge | | 215 | 233 | 251 | 394 | 467 | 230 | 231 | 233 | 306 | 469 | 608 | 715 |
| Facility charge | | 212 | 216 | 218 | 331 | 333 | 334 | 335 | 335 | 336 | 337 | 339 | 344 |
| | | 173,211 | 159,352 | 137,639 | 163,362 | 125,281 | 55,883 | 38,795 | 40,614 | 42,247 | 82,390 | 182,040 | 241,690 |
| Federal Carbon Charge - Customer Variance Account (FCCCVA) | | | | | | | | | | | | | |
| Aylmer | | | | | | | | | | | | | |
| Received via Billing - Customer Charge | | (175,004) | (161,730) | (139,106) | (131,107) | (122,659) | (52,128) | (35,253) | (33,617) | (34,914) | (74,270) | (181,761) | (237,119) |
| Federal fuel charge paid to CRA | | 172,999 | 159,136 | 137,421 | 163,031 | 124,948 | 55,549 | 38,461 | 40,279 | 41,856 | 81,861 | 181,371 | 237,206 |
| Monthly Total Monthly Interest | | (2,006) | (2,594) (4) | (1,685) (8) | 31,923 (11) | 2,289 47 | 3,421 51 | 3,207 15 | 6,662 16 | 6,942 20 | 7,591 23 | (390) 26 | 88 26 |
| Monthly Total with Interest | | (2,006) | (4) | (1,693) | 31,912 | 2,335 | 3,472 | 3,222 | 6,678 | 6,961 | 7,614 | (364) | 114 |
| Cumulative Monthly Total | | (2,006) | (4,599) | (6,284) | 25,639 | 27,928 | 31,349 | 34,556 | 41,218 | 48,160 | 55,751 | 55,361 | 55,449 |
| Cumulative Interest | | | (4) | (0,204) | (23) | 23 | 74 | 89 | 105 | 125 | 148 | 174 | 200 |
| Cumulative Total with Interest | - | (2,006) | (4,603) | (6,296) | 25,616 | 27,951 | 31,423 | 34,645 | 41,323 | 48,285 | 55,899 | 55,535 | 55,649 |
| Southern Bruce | | | | | | | | | | | | | |
| Received via Billing - Customer Charge | | - | - | - | - | - | - | - | - | (1,871) | (3,201) | (7,640) | (6,691) |
| Federal fuel charge paid to CRA | | - | - | - | - | - | - | - | - | 56 | 192 | 330 | 4,140 |
| Monthly Total | | - | - | - | - | - | - | - | - | (1,815) | (3,009) | (7,310) | (2,552) |
| Monthly Interest | | - | - | - | - | - | - | - | - | - | (1) | (2) | (6) |
| Monthly Total with Interest | | - | - | - | | - | - | | | (1,815) | (3,010) | (7,312) | (2,557) |
| Cumulative Monthly Total | | - | - | - | - | - | - | - | - | (1,815) | (4,824) | (12,133) | (14,685) |
| Cumulative Interest | | - | - | - | - | - | - | - | - | - | (1) | (3) | (9) |
| Cumulative Total with Interest | | | - | - | - | - | - | - | | (1,815) | (4,824) | (12,137) | (14,694) |

| Federal Carbon Charge - Facility Variance Account (FCCFVA) | | | | | | | | | | | | | |
|---|---|---------|---------|---------|--------|--------|--------|--------|--------|--------|--------|---------|------|
| Aylmer | | | | | | | | | | | | | |
| Received via Billing - Facility Charge | | (77) | (71) | (61) | (77) | (58) | (24) | (16) | (17) | (17) | (37) | (84) | (1 |
| Federal fuel charge paid to CRA | | 212 | 216 | 218 | 331 | 333 | 334 | 335 | 335 | 336 | 337 | 339 | 3 |
| Interest | | - | 0 | 1 | 1 | 1 | 2 | 1 | 1 | 1 | 1 | 1 | |
| Monthly Total with Interest | | 135 | 145 | 157 | 255 | 277 | 312 | 320 | 320 | 319 | 301 | 257 | 2 |
| Cumulative Monthly Total | | 135 | 280 | 436 | 691 | 966 | 1,276 | 1,595 | 1,914 | 2,232 | 2,533 | 2,788 | 3,0 |
| Cumulative Interest | | - | 0 | 1 | 2 | 3 | 5 | 5 | 6 | 7 | 8 | 9 | |
| Cumulative Total with Interest | | 135 | 280 | 437 | 693 | 969 | 1,281 | 1,600 | 1,920 | 2,239 | 2,541 | 2,797 | 3,0 |
| Greenhouse Gas Emissions Administration Deferral Account (GGEADA) | | | | | | | | | | | | | |
| Administration Costs | | | | | | | | | | | | | |
| Monthly Reporting Labour | | 135 | 135 | 135 | 135 | 135 | 135 | 135 | 135 | 135 | 135 | 135 | 1 |
| BDO - #CINV0673271 | | | | | | 1,590 | | | | | | | |
| Sub-Total | | 135 | 135 | 135 | 135 | 1,725 | 135 | 135 | 135 | 135 | 135 | 135 | 1 |
| Cost allocation based on customer volumes | | | | | | | | | | | | | |
| Aylmer | | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 99% | 99% | 99% | 9 |
| Southern Bruce | | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 1% | 1% | 1% | |
| Aylmer | | | | | | | | | | | | | |
| Costs allocated to Aylmer | | 135 | 135 | 135 | 135 | 1,725 | 135 | 135 | 135 | 134 | 134 | 134 | |
| Interest | | - | 0 | 0 | 1 | 1 | 4 | 1 | 1 | 1 | 1 | 1 | |
| Monthly Total with Interest | | 135 | 135 | 136 | 136 | 1,726 | 139 | 136 | 136 | 136 | 135 | 135 | |
| Cumulative Monthly Total | | 135 | 270 | 406 | 541 | 2,266 | 2,401 | 2,536 | 2,672 | 2,806 | 2,940 | 3,074 | 3,2 |
| Cumulative Interest | | - | 0 | 1 | 1 | 2 | 7 | 8 | 9 | 10 | 12 | 13 | |
| Cumulative Total with Interest | - | 135 | 271 | 406 | 542 | 2,268 | 2,408 | 2,544 | 2,681 | 2,816 | 2,951 | 3,087 | 3,2 |
| Southern Bruce | | | | | | | | | | | | | |
| Costs allocated to Southern Bruce | | - | - | - | - | - | - | - | - | 1 | 2 | 1 | |
| Interest | | - | - | - | - | - | - | - | - | - | - | - | |
| Monthly Total with Interest | | - | - | - | - | - | - | - | - | 1 | 2 | 1 | |
| Cumulative Monthly Total | | - | - | - | - | - | - | - | - | 1 | 2 | 4 | |
| Cumulative Interest | | - | - | - | - | - | - | - | - | - | - | - | |
| Cumulative Total with Interest | - | - | - | - | - | - | - | - | - | 1 | 2 | 4 | |
| D Total | | (1,735) | (2,317) | (1,400) | 32,303 | 4,338 | 3,923 | 3,678 | 7,134 | 5,602 | 5,042 | (7,283) | (2,0 |
| AL CUMULATIVE FEDERAL CARBON TAX | | (1,735) | (4,052) | (5,453) | 26,851 | 31,189 | 35,112 | 38,790 | 45,924 | 51,526 | 56,568 | 49,286 | 47,2 |

THIS IS EXHIBIT 'C' referred to in the Affidavit of Tim Hesselink sworn before me this 1st day of December, 2021.

Indiai

A Commissioner, etc.

EXHIBIT C

Hesselink, Tim

| From: | Hesselink, Tim |
|--------------|--|
| Sent: | Friday, November 19, 2021 8:57 AM |
| То: | 'larry@anwaatin.com'; 'Don.Richardson@sharedvaluesolutions.com'; |
| | 'Lisa@demarcoallan.com'; 'jonathan@demarcoallan.com'; |
| | 'ian.mondrow@gowlingwlg.com'; 'srahbar@igua.ca'; 'wmcnally@opsba.org'; |
| | 'mark@shepherdrubenstein.com'; 'jay@shepherdrubenstein.com'; |
| | 'schambers@kincardine.net'; 'clerk@arran-elderslie.ca'; 'mrwalden@huronkinloss.com'; |
| | 'jlawford@piac.ca'; 'markgarner@rogers.com'; 'registrar@oeb.ca'; 'Patrick McMahon'; |
| | 'EGIRegulatoryProceedings@enbridge.com'; |
| | 'edance@kincardine.net'; 'clerk@kincardine.net'; 'cao@brucecounty.on.ca'; |
| | 'anembhard@igpc.ca'; 'sstoll@airdberlis.com'; 'pzarnett@bdrenergy.com'; |
| | 'lawford@piac.ca'; 'Mark Garner'; 'tmichiels@thamescentre.on.ca'; 'clerk@swox.org'; |
| | 'cao@elgin.ca'; 'jbrick@town.aylmer.on.ca'; 'csaunder@london.ca'; |
| | 'pshipway@centralelgin.org'; 'aadams@malahide.ca'; 'teresa.olsen@norfolkcounty.ca'; |
| | 'tthayer@bayham.on.ca'; 'Clerks@norfolkcounty.ca' |
| Cc: | Alexander Di Ilio; Robinson, Susannah; O'Callaghan, Daniela |
| Subject: | Notice of Application - EB-2021-0268 - ENGLP Federal Carbon Pricing Plan - rates |
| | effective April 1, 2022. |
| Attachments: | Notice_EPCOR_2022_FCPP_20211118.pdf; ENGLP_CVRLTR_FCPP_20211104.pdf; |
| | ENGLP_APPL_FCPP_20211104.pdf |

Hello all,

Re: EPCOR Natural Gas Limited Partnership (ENGLP) Federal Carbon Pricing Plan Application - Aylmer and South Bruce **Ontario Energy Board File Number: EB-2021-0268**

Please find attached the notice of application for EPCOR Natural Gas Limited Partnership's Federal Carbon Pricing Plan application for rates effective April 1, 2022.

Information related to this proceeding will also be posted on the OEB's website under the filing reference number.

Regards,

Tim



PROVIDING MORE

Tim Hesselink, CPA, CGA

Senior Manager, Regulatory Affairs **EPCOR** Ontario 43 Stewart Road, Collingwood, ON T: 705.445.1800 ext. 2274 epcor.com

THIS IS EXHIBIT 'D' referred to in the Affidavit of Tim Hesselink sworn before me this 1st day of December, 2021.

Im Level

A Commissioner, etc.

EXHIBIT D

https://www.epcor.com/about/news-announcements/notices/Pages/Notice-of-Proceeding-for-2022-Federal-Carbon-Pricing-Program-Applications.aspx?mylocation=aylmer_ontario



EPCOR has applied to the Ontario Energy Board for approval to increase its rates effective April 1, 2022, to receive the contrainsected with meedic also ablightness under the taskent government's Greenburge Gas Polytion Pitchig Act, EPCOR has also applied to dispose of the balances in the related deferral and variance accuments. If the application is approved as field, the and out EPCOR charges a typical relational variance accuments. If the relation is approved as field, the and out EPCOR charges a typical relational variances.

- A trainal residential customer in the Aylaner service area will see an annual but increase of \$16,87.
 This is composed of an annual bit increase of \$41,44 swamp from the 2022 extrain charges struct is reduced by a credit of \$24,54 anving from the disposition of balances in the resided detenal and variance accounts.
- A topical residential contenser in the South Druce service area will see an annual bill increase of \$40,96, This is compared of an annual bill increase of \$42.12 writing from the 2022 carbon charges that is reduced by a credit of \$1,14 ansing from the disposition of balances in the related deterral and variance accounts.

The Greenhouse Gas Pollation Parling Act establishes a carbon pricing program under which a natural gas units in Ortano, such as EPCOR, is required to pixe a carbon charge that the control gas that it devices to its continues. The carbon charge care, into effect on Appl 1, 2019, The charge intercored to 7,83 centrol and valid 1, 2021 and will intercase to 9,79 cents/m2 on April 1, 2022. The costs related to emissions from the ponether of EPCOR's notating gas elitifications setum are also increasing.

Read our customer notice

· Read the application

Be informed and have your say

You have the right to information regarding this application and to be involved in the process.

- · You can review EPCOR's application on the OEB's website new
- You can file a letter with your comments, which will be considered during the hearing
- You can become an Intervence. As an intervener you can ask questions about EPCOR's application and make arguments on whether the OEB should approve EPCOR's request. Apply by December 6, 2021 or the hearing will go shead without you and you will not receive any further notice of the proceeding.
- At the end of the process, you can review the OEB's decision and its reasons on their website

Learn more

Our file number for this case is EB-2021-0268. To learn more about this hearing, find instructions on how to file a letter with your comments or become an intervenor, or to access any document related to this case, please enter the file numbers EB-2021-0268 on the OEB website. You can also phone the Public Information Centre at 1 (877) 632-2727 with any questions.

Oral vs. Written Hearings

There are two types of OEB hearings oral and written. EPCOR has applied for a written hearing. The OEB is considering this request. If you think an oral hearing is needed, you can write to the OEB to explain why by December 6, 2021.

Privacy

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed, if you are a business, all your information will remain public, if you apply to become an intervener, all information will be public.