



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

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

January 12, 2022
Our File: EB20210209

Attn: Nancy Marconi, Acting Registrar

Dear Ms. Marconi:

Re: EB-2021-0209 – Enbridge Gas Federal Carbon Pricing Program – SEC Submission

We are counsel to the School Energy Coalition (“SEC”). These are SEC’s submissions on the application by Enbridge Gas Inc. (“Enbridge”) for approval for various relief related to its Federal Carbon Pricing Program (“FCPP”), specifically costs associated with its pass-through obligations under the *Greenhouse Gas Pollution Pricing Act*, and the disposition of related deferral and variance account (“DVA”) balances.

SEC has reviewed the pre-filed evidence and the responses to interrogatories, and finds the relief sought in the application is reasonable and consistent with the Board’s previous FCPP decisions. Enbridge has correctly calculated the appropriate 2022 Federal Carbon Charge, and the balances in the customer and facility-related variance accounts reflect the correct 2020 variances. SEC also submits that the amounts for disposition in the Enbridge Gas and Union Gas Rate Zone Greenhouse Gas Emissions Administration Deferral Accounts (“GGEADA”) are reasonable.

SEC notes that while Enbridge has provided forecast 2022 administration costs, it is not seeking any relief with respect to those costs in this application, as actual costs will be recorded in the GGEADA and recovery will be sought in a future proceeding. On that basis, SEC is not providing any comment on the reasonableness of those forecast costs.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Ted Doherty, SEC (by email)
Applicant and Intervenors (by email)

Shepherd Rubenstein Professional Corporation | **Regulatory Law**
2200 Yonge Street, Suite 1302 T. (416) 483-3300 F. (416) 483-3305
Toronto, ON M4S 2C6 shepherdrubenstein.com