

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624
E-mail: randy.aiken@sympatico.ca

April 12, 2022

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

Dear Ms. Marconi,

RE: EB-2022-0072 – Consultation to Review Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc. – Questions from London Property Management Association

Please find attached the questions of the London Property Management Association in the above noted consultation.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Affairs

**ENBRIDGE GAS INC.
2022 ANNUAL GAS SUPPLY PLAN UPDATE**

**QUESTIONS OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

LPMA-1

Ref: Table 1

- a) Is Table 1 for the EGD rate zone only or for all rate zones in EGI?
- b) What year are the figures shown in Table 1 for?
- c) Please provide the actual percentages by month for the last year completed gas supply years and explain any significant variances that have taken place.

LPMA-2

Ref: Table 2

Please expand Table 2 to include historical years 2018/2019, 2019/2020 and 2020/2021.

LPMA-3

Ref: Table 2

- a) Table 2 reflects in the increase in the federal carbon charge on April 1, 2022 to \$50 per tCO₂e and an increase of 2% for each year thereafter. Based on the price elasticity used in the demand forecasts, what is the approximate impact on the total demand forecast for each year shown if the federal carbon charge was increased by \$15 per tCO₂e in place of the 2% increase.
- c) Based on the recent increase in natural gas prices, approximately what impact (in percentage terms) does EGI expect that this may have on the annual demand forecast?

LPMA-4

Ref: Table 2

Table 2 shows an increase in each year for the general service rate classes in each of the EGI rate zones.

- a) Other than the addition of new general service customers, what other factors are contributing to the increase in total general service volumes?
- b) In the absence of the addition of any new general service customers, would the general service volumes decline, and if so, by approximately what percentage each year?

LPMA-5

Ref: Table 4

Please expand Table 4 to include historical years 2018/2019, 2019/2020 and 2020/2021.

LPMA-6

Ref: Tables 9, 10, 11, 16 & 25

Please expand the tables noted in the reference above to include historical years 2018/2019, 2019/2020 and 2020/2021.

LPMA-7

Ref: Page 35

The evidence states that “In accordance with the gas supply planning principle of aligning to public policy, EGI is evaluating how it can further support the development of an RNG market in Ontario.

Since the filing of this annual update at the beginning of March, 2022, has EGI or any of its affiliates entered into any RNG development projects? If so, what is the involvement of EGI or its affiliates in the projects (eg. Only connection to distribution system, compression, ownership, etc.)?

LPMA-8

Ref: Pages 35-36

The evidence indicates that as of January 31, 2022, EGI had 835 customers enrolled in its voluntary RNG program.

- a) What is the approximate annual volume of consumption for this group of customers?
- b) Has EGI purchased any RNG supply for these customers as of the current date? If so, what volume has been purchased?

LPMA-9

Ref: Table 6

With the exception of 2023/24 (leap year), the sources of supply for the EGD Union North East and Union South zones are all constant over the five year period with the exception of supplies from Dawn (and Peaking/Seasonal for the EGD zone).

- a) Does this mean that current gas supply plan relies on Dawn purchases for all of the growth forecast over the five-year period shown?
- b) Is the purchase of gas at Dawn the primary source of gas supply to deal with annual and seasonal variances caused by weather and other economic factors?

LPMA-10

Ref: Table 9

Table 9 shows contingency storage space for Union but nothing for EGD.

- a) Why is there no contingency space for the infranchise storage requirement associated with EGD, while there is for Union?
- b) Is all of the Union contingency space associated with Dawn?
- c) Do Tecumseh and Welland have any contingency space associated with them? If so, how much contingency space is included in each of them?
- d) What is the current status of any storage related harmonization between the EGD and Union rate zones, including but not limited to the definition and use of contingency space?

LPMA-11

Ref: Table 10

Will a harmonized gas supply plan result in any changes to the level of planned UDC in any of the years shown? If yes, please explain the magnitude and direction of any changes.

LPMA-12

Ref: Table 11

In-franchise supply shows a design day delivery of 68 TJ/day in the EGD CDA zone.

- a) Does EGI consider this in-franchise supply to be firm gas deliveries given that it is included in the design day deliveries?
- b) What is the source of this gas? Is it local gas production and/or renewable natural gas and/or LNG? If a combination, please break down the design day delivery of 68 Tj/day into the different sources.
- c) If any of the in-franchise source is local natural gas production, where is this production located?

LPMA-13

Ref: Tables 6 & 11

- a) Please explain why Table 6 does not show any in-franchise annual supply of gas for EGD but Table 11 does show in-franchise design day deliveries for EGD.
- b) Why does Table 6 not show any in-franchise annual supplies?
- c) What is the approximate number of TJ's purchased by EGI annually in each of the EGD and Union rate zones?
- d) What is the approximate number of TJ's produced annually into each of the EGD and Union rate zones?

LPMA-14

Ref: Table 25

- a) Why is there no in-franchise supply shown for Union South?
- b) Are there in-franchise supplies arriving in the Union South zone on a design day?