SCOTT POLLOCK
T 613.787.3541
spollock@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com

Our File # 339583.000294

By electronic filing

April 14, 2022

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

Dear Ms. Marconi

Re: Enbridge Gas Inc. ("EGI")
2022 Annual Update to 5 Year Gas Supply Plan
Board File #: EB-2022-0072

We are writing on behalf of Canadian Manufacturers & Exporters ("CME").

Please find attached the following written questions for EGI on behalf of CME.

Yours very truly

Scott Pollock

c. Richard Wathy (EGI)
David Stevens (Aird & Berlis LLP)
EB-2022-0072 Intervenors
Allison Bernholtz (CME)
Mathew Wilson (CME)

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ONTARIO ENERGY BOARD
Enbridge Gas Inc.
ANNUAL UPDATE TO 5 YEAR GAS SUPPLY PLAN

INTERROGATORIES OF CANADIAN MANUFACTURERS & EXPORTERS ("CME") TO ENBRIDGE GAS INC ("EGI")

Interrogatory CME-1

Ref: 2022 Annual Gas Supply Plan Update, p. 8.

At p. 68, EGI stated "EGI is currently evaluating the alignment of the methodology for selecting design weather and estimating design day demand between the legacy utilities. Currently, the Union rate zones use a set temperature approach, whereas the EGD zones use a probabilistic approach."

After engaging a third party to engage in a comparative analysis of industry practice, EGI found that among "similarly situated" natural gas utilities, a set temperature approach was used by the majority.

(a) How did EGI define "similarly situated" natural gas utilities, and how do those similarities impact which modelling methodology is more appropriate?

(b) What would the impact be if EGI adopted probabilistic analysis for all rate zones? Please provide reference to gas supply changes that would occur as a result.

(c) Besides reviewing "similarly situated" utilities, has EGI studied, or does it have its own views regarding the strengths and weaknesses of each type of methodology, and their respective suitability for use for EGI?

Interrogatory CME-2

Ref: 2022 Annual Gas Supply Plan Update, p. 24.

EGI's forecast annual demand for 2021/2022-2025/2026 in the summer of 2021 using the best available information. Since summer 2021, the commodity price of gas has increased significantly in three consecutive QRAM proceedings (EB-2021-0219, EB-2021-0281, and EB-2022-0289). While EGI has proposed and received approval to smooth those increases into the future, commodity price are still significantly higher than summer 2021.

(a) What is the impact of the above-noted commodity price increases on natural gas demand? Please provide as much detail as possible.

(b) To the extent that the price increase were to reduce demand for natural gas, please explain how EGI has taken this into account in its gas supply plan for 2022.