

REF: 2022 GSP UPDATE, p. 8

EGI evidence states: *Assuming no other changes to processes upstream of the Gas Supply Plan, if EGI were to align weather and design day demand methodologies to a set temperature approach, EGI estimates that additional design day gas supply services would be required in the range of 100-150TJ/d, or approximately 2.5-3.7%, for the EGD delivery areas.*

- 1) What is the basis for choosing the set temperature model and how is EGI proposing the design temperature be set?

REF: 2022 GSP UPDATE, p.11

EGI evidence states: *Aggregate excess is an OEB approved methodology and has been used in the Union rate zones since 2000, approved in RP-1999-0017, and used by EGD since that same time.*

- 2) Please provide the reference and proceeding where the Board approved EGD's use of aggregate excess.

REF: 2022 GSP UPDATE, p.12

EGI evidence states: *In addition to using aggregate excess to determine the amount of storage space for load balancing needs, EGI uses SENDOUT to determine if there is an economic benefit to holding more storage than the aggregate excess calculation determines.¹⁴ By leveraging SENDOUT, EGI can determine if there are potential cost savings to contracting for additional storage or relying on incremental winter purchases.*

- 3) Does EGI use SENDOUT to determine if it is more economic to contract for more storage in Union South rate zone?
 - a) Please explain why or why not?
- 4) Using the last 10 years, when does the average year switch between withdrawal and injection for each of the Union Dawn and EGD Tecumseh storage pools?

REF: 2022 GSP UPDATE, p.13 and Table 1

EGI evidence states: *Since there is risk that peak and near-peak demand days can occur at any point during the winter, EGI's Gas Supply Plan uses storage to mitigate the risk of late-season demand spikes and the costs associated with buying spot gas when the availability of market supply is low.*

- 5) What does EGI mean by "market supply is low"?

6) Why would it not be a sound strategy to plan to buy additional volumes in March?

REF: 2022 GSP UPDATE, p.14-15

EGI evidence: *Operationalizing the Load Balancing Portfolio*

- 7) How does EGD incorporate targeted storage levels throughout the winter to trigger a need to buy spot gas?
- 8) How EGI value optionality of buying or not buying spot purchases?
- 9) Please demonstrate how peak day deliverability needs are assessed for Union North and EGD Ottawa?

REF: 2022 GSP UPDATE, p.20

EGI evidence states: *Despite increased flows on the Mainline, neither the WML nor ET Short-Term Adjustment Accounts reached a balance of +/- \$100 million following 2021, so dispersal from the deferral accounts were not triggered. As a result, Mainline tolls remain as approved in order TG-014-2020 by the CER for 2022.*

- 10) Notwithstanding the fact that there was no dispersal in the referenced deferral accounts, please confirm there was an across the Board toll decrease and please provide the approximate percentage (or range) of that decrease.

REF: 2022 GSP UPDATE, p.26 Table 4

- 11) What are the drivers that contribute to the higher rate of increase of the design demand in Union South?
- 12) Please confirm that the control point for demand day demand in Union South is Parkway.
- a) What was the amount of obligated DCQ at Parkway during the 2021/22 winter?

Preamble: We understand that EGI has initiated an opportunity for direct purchase customers for move their obligated delivery point from Parkway to Dawn.

- 13) Please provide the notice provided customers
- i) Please provide the acceptance of the offer at this time.

REF: 2022 GSP UPDATE, p.36

14) Is the number of 155 RNG facilities in Ontario correct as it is the same number as the amount of economic RNG available in the previous paragraph?

REF: 2022 GSP UPDATE, p.39-40, Appendix C, D & Figure 5**AND EB-2021-0281, EB-2022-0089 Exhibit C, Tab 1, Schedule 1**

EGI evidence states: *Vector provides a competitively priced, reliable, and flexible transportation option that offers supply diversity at Chicago as well as along the Vector route, including the ability to supply the Sarnia Industrial Line.*

Preamble: We would like to understand better the contracting for Vector capacity specifically that receives gas in the Chicago area.

15) Prior to the additional contracts added in 2021, please provide the amount of gas per day that was received in the Chicago area (including Alliance, North Border, etc.). Clarify as needed.

16) Using the format of Figure 5 that reflects timing of purchases, please provide a summary for each month of the 2021 winter for gas purchased in the Chicago area.
a) Please provide figure that graphs the daily basis differential between Chicago and Dawn for each quarter of 2021.

17) Please explain why, in wanting to source gas in Chicago in its pursuit of diversification, why EGI did not consider entering into an exchange agreement to move gas Chicago to Dawn at market rates on a seasonal or annual basis.

18) Please reconcile the transportation costs shown in Appendix D for Vector transport with the transportation costs shown for Vector in the last two QRAM's.

Preamble: Among the benefits of the incremental capacity to the EDA, EGI does not list additional STS credits in spite of the fact that line 37 of the Union North transport contracts exhibits STS withdrawal to the EDA.

19) Does EGI still hold STS to the EDA or should line 37 be designated as EMB?

REF: 2022 GSP UPDATE, p.41, Table 9

20) Please provide the reference to where the determination of the in-franchise requirement for storage on the record from past proceedings.
a) If not available, please provide the calculation

REF: 2022 GSP UPDATE, p.42

EGI Storage Portfolio evidence states: *Storage provides further operational flexibility and aligns with the planning target to fill storage on November 1, maintain sufficient inventory on February 28 to meet the design day storage withdrawal requirement, and on March 31 to meet planning requirements.*

- 21) For Union South, how much inventory is maintained on March 31st.
- Does that include gas in the system integrity space?
 - When has system integrity space been utilized? Please provide the circumstances associated with the utilization.

EGI Unutilized Capacity Evidence states: *In the Union North rate zones, the upstream transportation portfolio is sized to meet design day demand. Logically, the amount of supply transported to meet average annual demand is less than the capacity needed to meet requirements on design day. As a result, a portion of EGI's contracted capacity is planned to be unutilized during the year. The difference between the total contracted capacity and total demand for both Union North sales service and bundled DP customers equals the planned unutilized capacity.*

- 22) Has EGI explored through RFP, the cost of winter peaking service vs. cost of maintaining capacity?
- If so, please provide the assessment.
 - If not, why not?

REF: 2022 GSP UPDATE, p.47-49, Table 15

EGI evidence states: *Since the 5-Year Plan was filed, there have been no change in options to serve and no material differences in the evaluation matrix, therefore the preferred strategy is still to procure a third-party service. EGI will continue to monitor any shortfall positions and make decisions using the best available information at that time.*

- 23) What quantity of peaking service was purchased for delivery in the winter of 2021/22 for the:
- CDA
 - EDA
- 24) How are the unit costs in Table 15 derived?
- Please show an example using:
 - Long-haul
 - Third party

REF: 2022 GSP UPDATE, p.53

EGI evidence states: *As stated in EGI's 2020 update to the 5-year Gas Supply Plan, third-party services will be considered as an option to meet a shortfall⁷⁴ and will utilize LNG to meet shortfalls in the Union NDA within the capabilities of the LNG system and recognizing that the LNG system is also relied upon for system integrity purposes.*

- 25) How are the LNG costs allocated between regulated supply and third-party services?
a) How much was allocated to each for the 2020 and 2021 years?

REF: 2022 GSP UPDATE, p.56-57, Table 24

EGI evidence states: *EGI will monitor the requirement for incremental transportation services to the Union North West rate zone. Since the 5-Year Plan was filed, the option of serving the Union WDA from a supply source in Michigan and GLGT transportation looks more attractive and EGI will monitor the availability of this option. At this time the preferred strategy is to procure third-party services for up to 2% of the Union WDA peak day demand and FT Long-Haul transportation for the remainder EGI will continue to monitor any shortfall positions and make decisions using the best available information at that time.*

- 26) Please provide the derivation of unit costs in Table 24.
- 27) Please provide the incremental transportation contract analysis for the Union North WDA.
- 28) For what period is Table 24 asserting that there is no capacity available on GLGT?

REF: 2022 GSP UPDATE, p.57, Table 25

- 29) Please provide a more complete description of line 4, Non-obligated Power Plants and how the contribution to supply is determined.

REF: 2022 GSP UPDATE, p.60, Table 28

- 30) Please explain why the costs for available capacity on NEXUS is lower than Rover in Table 28 and higher in Appendix D & G.

REF: 2022 GSP UPDATE, p.70, Table 34

31) Please provide the source of UDC for Union South (i.e., which paths, sources of gas, etc and the reason that delivery could not be taken)?

- a) For each month of those respective years, please provide the actual amount of incremental Dawn deliveries planned, the time frame committed to (amount of time in advance of delivery when the transaction was completed). and the amount committed.

REF: 2022 GSP UPDATE, Appendix C

Preamble: We would like to understand more about how EGI manages its transportation contracts through assignment to third parties.

32) For each transportation path that was assigned during 2021, please provide a table that provides the daily amount contracted, the daily amount assigned for each month of 2021, the total amount that was actually delivered in that month, the additional revenue that was generated, the account that received the revenue and the net impact on gas supply and transportation costs (using a table similar to below).

PATH

Month	Contracted (GJ/day)	Assigned (GJ/day)	Total Delivered (\$/GJ)	Incremental Revenue (\$)	Account	Gas Cost Impact (\$)	Transport Cost Impact (\$)

REF: 2022 GSP UPDATE, Appendix D

33) Why is there a difference between “Costs from the 2021 Q1 ICF base case” and “EGI's Analysis Completed in Mar -20” (i.e., the analysis occurred before the base case was created) ?