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August 29, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto, ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2022-0133 Enbridge Gas Inc. 2023 Rates Application
Energy Probe Interrogatories**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the applicant in the EB-2022-0133 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its 2023 rates.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Roger Higgin (Sustainable Planning Associates Inc.)
Petar Prazic (OEB Staff)
Ian Richler (OEB Staff)
Rakesh Torul (Enbridge Gas Inc.)

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ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission, and storage of gas as of January 1, 2023.

Enbridge Gas Inc. 2023 Rates Application

Energy Probe Interrogatories

August 29, 2022

Enbridge Gas Inc. 2023 Rates Application

Energy Probe Interrogatories

Normalized Average Use per Customer

EP.1

References:

Exhibit B, Tab 1, Schedule 1 Page 10/11 Plus Appendices;
Exhibit D, Tab 1, Rate Order, Working Papers, Schedule 10;
Exhibit D, Tab 2, Rate Order, Working Papers, Schedule 13;
EB-2021-0147 Exhibit I.EP.1 Response

Preamble: “Rate 1 and Rate 6 average uses include the incremental impact of planned DSM for 2023 and have been normalized to the 2023 forecast degree days for each region as determined by OEB-Approved degree day methodologies.”

- a) Please provide updates to the tables and charts in EB-2021-0147 Exhibit I.EP.1 showing 2021 actuals 2022 E and 2023 forecast
- b) Please provide a discussion for each rate class
 - i. Changes in 2021 actuals
 - ii. 2022 YTD trends
 - iii. 2023 forecast
 - iv. Specifically, the drivers for -2.4% AU decrease for EGD Rate 1, -4.7 % for Union RZ Rate 01 and -3.6% for Union RZ M1.
 - v. Adjustment for DSM
- c) Please provide trend lines in the charts requested in part a)

Degree Day Forecast

EP.2

References: Exhibit B, Tab 1, Schedule 1, Page 11 para. 26&27
Exhibit D, Tab 1, Rate Order, Working Papers, Schedule 10.
Exhibit D, Tab 2, Rate Order, Working Papers, Schedule 13.
EB-2021-0147 Exhibit I.EP.2 Attachment 1

Preamble: “Rate 1 and Rate 6 average uses include the incremental impact of planned DSM for 2023 and have been normalized to the 2023 forecast degree days for each region as determined by OEB-Approved degree day methodologies. The Union rate zones general service storage and delivery rates have been adjusted to reflect the 2021 actual NAC, using the 2023 OEB-approved weather normal methodology blend of 50:50 (30-year average and 20-year declining trend).”

- a) Please update EB-2021-0147 Exhibit I.EP.2 Attachment 1 to show the derivation of the 2022 forecast Budget Degree Days for each of the 3 DD Zones.

- b) Discuss if each of the Preferred DD Methodologies still produce the best result compared to the other options.

Parkway Delivery Option

EP.3

Reference: Exhibit B, Tab 1 Schedule 1, para. 44

Preamble: Parties supported the exchange service identified by Enbridge Gas as a cost-effective means to potentially reduce the current PDO by allowing PDO obligated customers to shift, in aggregate, up to an additional 37 TJ/day of Parkway obligated deliveries to Dawn at a cost to Enbridge Gas below that of the current PDCI paid on those Parkway obligated volumes.

- a) Please provide details of PDO volumes shifted to Dawn during 2022 YTD, by month.
- b) Please provide the monthly and total payments to Direct Customers in 2022 YTD.
- c) Compare the costs of the exchange service and PDCI on a volumetric basis.
- d) Please provide the monthly forecast of volumes for 2022 and for 2023.
- e) Please provide the forecast of Exchange and PDCI costs for 2023.

Hydrogen Gas Rate Rider

EP.4

Reference: Exhibit B, Tab 1, Schedule 1, page 12

Preamble: “Enbridge Gas has reviewed the hydrogen gas rate rider calculation based on the most recent approved rates (EB-2022-0089, April 1, 2022, QRAM) for Rate 1 and Rate 6 and confirms the change in the rate rider exceeds 25%. As a result, Enbridge Gas is proposing to increase the Rate 1 rate rider credit from \$10 to \$16 annually.”

- a) Please provide an update on the number of customers (by class) receiving blended H₂ gas.
- b) Please provide the calculations that support the proposed increased rate rider credit for Rate 1 and Rate 6.

Enbridge Gas Commitments and Directives

EP.5

Reference: Exhibit B, Tab 1, Schedule 1, Appendix B

Preamble: Normalized Average Consumption, Average Use and Lost Revenue Adjustment Mechanism: File a proposal addressing Average Use/Normalized Average Consumption at the next rebasing application with supporting evidence for the approach. This proposal should address an LRAM mechanism that includes general service customers.

- a) Please provide the detailed scope of the proposed approach.
- b) Will EGI discuss the scope with interested parties prior to issuing the RFP?

EGD Rate Zone - Summary of Proposed Rate Change by Rate Class

EP-6

Reference: Exhibit D, Tab 1, Rate Order, Appendix A, pages 1 to 4

Preamble: Column 3 of the exhibit includes escalated base rates combined with the total of ICM amounts approved in previous OEB decisions.

Please break out Col.3 into two columns, Col 3a showing base rates, and Col. 3b showing the total of previously approved ICM amounts.

Union Rate Zones – Summary of Changes to Rates

EP-7

Reference: Exhibit D, Tab 2, Rate Order, Appendix A, pages 1 to 17

Preamble: Column (a) of the exhibit includes escalated base rates combined with the total of ICM amounts approved in previous OEB decisions.

Please break out Col. (a) into two columns, Col. (a-1) showing base rates, and Col. (a-2) the total of ICM amounts approved in previous OEB decisions.

Submitted on behalf of Energy Probe by its consultants:

Roger Higgin
SPA Inc.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.