

VIA RESS and EMAIL

September 19, 2022

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

Dear Nancy Marconi:

**Re: EB-2022-0219 – Enbridge Gas Inc. – October 1, 2022
Reply Submission to FRPO - Quarterly Rate Adjustment Mechanism
(GRAM) Application**

On September 17, 2022, FRPO filed a submission with regards to the interrogatory responses that were filed on September 16. Enbridge Gas would like to take the opportunity to reply to FRPO's submission.

On page 2 of FRPO's submission it states, "...following the notes provided in Exhibit C, Tab 4, Schedule 10, we struggled as the first 3 notes were clearly incorrect as the references denoted page 14 of Schedule 8 from the last 3 GRAM's." Enbridge Gas acknowledges that these footnotes were inadvertently not updated correctly in the Application. All three footnotes as identified by FRPO should have referenced Schedule 10, Page 14, not Schedule 8, Page 14.

On Page 2 of FRPO's submission it states, "...note 3 calculated an allocation factor using a value that was not referenced to the source." Enbridge Gas does not agree with this. In the July 2022 GRAM, Exhibit C, Tab 4, Schedule 10, Page 14, footnote 3 indicates that the values in Col. 4 are calculated by multiplying the percent in Col. 2 by the total Peaking Supplies Total for Clearing in Col. 3. The source for the % Allocation in Col. 2 is Exhibit C, Tab 3, Schedule 4, Page 1, Line 3.1 as indicated in footnote 1. The source for the Peaking Supplies Total for Clearing in Col. 3 is Exhibit C, Tab 1, Schedule 2A, Page 1, Line 13, Col.12 as indicated in footnote 2.

FRPO has also requested that the OEB direct EGI to provide the working schedules in a working Excel format. Enbridge Gas would like to respectfully submit that Enbridge Gas has not deviated from the OEB approved GRAM methodology which has been in place for many years. The files as requested by FRPO are large internal models that underpin the numerous schedules that get filed with the OEB for each GRAM. Enbridge Gas believes that the information filed in its GRAM application is thorough and comprehensive and is sufficient for the OEB and stakeholders to understand the change in natural gas prices, and consequently rates. For this reason, Enbridge Gas does not believe that providing working schedules will provide value to this process which is meant to be a mechanistic process.

September 19, 2022
Page 2

Should you have any questions on this matter please contact the undersigned at 416-319-2534.

Sincerely,

Asha Patel
Technical Manager, Regulatory Applications

cc: All Interested Parties EB-2008-0106, EB-2019-0137, EB-2022-0072,
EB-2021-0147 & EB-2021-0148