



Vanessa Innis  
Manager  
Strategic Applications – Rate  
Rebasing  
Regulatory Affairs

tel 416-495-5499  
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.  
P. O. Box 2001  
50 Keil Drive North  
Chatham, ON N7M 5M1

March 8, 2023

**VIA RESS AND EMAIL**

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)  
EB-2022-0200 - 2024 Rebasing – Phase 1 Interrogatory Responses**

Enbridge Gas filed its 2024 Rates Application and the majority of its supporting evidence on October 31, 2022 and the balance of its evidence on November 30, 2022. In this Application, Enbridge Gas requests approval of rates for the sale, distribution, transmission, and storage of gas commencing January 1, 2024. Enbridge Gas also applies for approval of an incentive rate-making mechanism (IRM) for the years from 2025 to 2028.

In Procedural Order No. 1, the OEB made a provision for written interrogatories with a due date for Enbridge Gas's responses of March 8, 2023. In Procedural Order No. 2, the OEB finalized the issues list and the phasing of the proceeding.

In accordance with Procedural Order No. 1, enclosed please find Enbridge Gas's interrogatory responses. Enbridge Gas will post the responses on its website at [www.enbridgegas.com/about-enbridge-gas/regulatory](http://www.enbridgegas.com/about-enbridge-gas/regulatory). Enbridge Gas will send a copy of this letter, and a link to the website page, to all parties to the proceeding.

In filing its interrogatory responses, Enbridge Gas notes 2022 actual information provided in response to requests is subject to finalization and may change in Enbridge Gas's 2022 Utility Earnings and Disposition of Deferral and Variance Account Balances Application.

With respect to responses from external experts:

- In responding to Exhibit I.1.10-ED-66, Guidehouse discovered an error in its modeling for the P2NZ, which has potential impacts to its report. Once confirmed, Guidehouse will update the P2NZ report with the required change. Guidehouse will also review and update interrogatory responses that are affected. To date, Guidehouse has identified the following potentially affected responses within Exhibit I.1.10: ED-27, ED-44, ED-60, ED-61, ED-62, ED-63, ED-66, GEC-15,

GEC-20, GEC-21, GEC-24, GEC-38, GEC-39, PP-16, PP-19, SEC-47, and SEC-54.

- In responding to Exhibit I.4.5-STAFF-178, Concentric noted that at the time of its study it did not have certain historical data, which it has now received from Enbridge Gas. An amended depreciation study may be filed based upon the additional data.

As noted in the response to Exhibit I.1.7-STAFF-11, Enbridge Gas requests clarity regarding issue 40 on the issues list and the OEB's intent to address Enbridge Gas's request for a one-year exemption from the Gas Distribution Access Rule (GDAR) for 2023 for certain performance measures within this proceeding. In this regard, Enbridge Gas notes that issue 40 is currently confined to Enbridge Gas's request for a partial exemption from certain GDAR performance measures only for 2024.

In accordance with the OEB's revised [Practice Direction on Confidential Filings](#) effective December 17, 2021, Enbridge Gas is requesting confidential treatment of portions of several interrogatory responses and/or attachments to the interrogatory responses. The requests fall into two categories.

- A) Responses including redactions of irrelevant information.
- B) Responses including redactions of confidential information.

Attachments A and B to this letter set out details of the requests being made in each category.

As required by the Practice Direction, Enbridge Gas has filed confidential un-redacted versions of each of the applicable documents, identifying all portions of the document for which confidential treatment (or non-relevance) is claimed, as well as non-confidential redacted versions of each such document.

Enbridge Gas notes that in accordance with the Practice Direction representatives of parties who sign the OEB's Declaration and Undertaking will be provided with unredacted versions of the confidential (but not the irrelevant) documents. Enbridge Gas requests that permission to access the unredacted version of the confidential documents associated with Exhibit I.2.CCC-3 and Exhibit 1.12-SEC-94 not be granted to experts on behalf of other parties in this case. The redacted information in those documents relates to hourly rates and pricing for Enbridge Gas's experts. This is commercially sensitive information, and access to such information could give other experts information not otherwise available that could (at least theoretically) provide some advantage unrelated to the proceeding. The OEB's ability to limit who can receive certain confidential documents is set out in section 6.1.7 of the Practice Direction.

Finally, Enbridge Gas expects to file a letter by March 13, 2023 outlining preliminary panel structure for the Technical Conference, to aid parties with their March 15, 2023

submissions on the specific areas they will focus on at the Technical Conference, and time estimates.

Should you have any questions, please let us know.

Sincerely,

Vanessa Innis  
Manager, Strategic Applications – Rate Rebasing

### Attachment A – Irrelevant Information

	Exhibit	Description of Document	Irrelevant Information Location	Brief Description	Basis for (Ir)relevance Claim
1.	2.6-SEC-110	Asset Management Maturity Review Report, Jacobs Consultancy Canada Inc., completed for Enbridge Inc. related to liquids pipelines, gas transmission and gas distribution and storage business units	Attachment 1, pages 11-13, 23, 28-51, 94-132, 135-136 and 144-166	Redacted information related to other Enbridge Inc. business units and not related to Enbridge Gas	Only part of the produced report relates to Enbridge Gas. The balance of the report relates to other business units that are not the subject of this Application and that are not subject to OEB oversight.
2.	5.3-IGUA-29	Strategic Plan for the gas distribution and storage business unit (GDS) for 2021 and 2022	Attachment 1, pages 2, 3, 6, 8, 9 and 10  Attachment 2, pages 2, 5, 6, 7, 8 and 9	Redacted information related to unregulated business activities	The interrogatory asks for “strategic business plans or assessments” for Enbridge Gas. The portions of the responsive documents that address non-regulated activities are not relevant to the determinations to be made in this proceeding. The rates to be approved are based upon the regulated activities of sale, storage, distribution and transmission of gas.  Note that the redacted items are also confidential in that they relate to activities that may be undertaken in the competitive market.

### Attachment B – Confidentiality Requests

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
1.	1.2-CCC-3	Contracts and retainer agreements with experts	Attachment 2, pages 2-3, 5-6, 9-12, 15, 27, 42-43, 49, 52, 60-62, 64, 100, 119, 121-122, 124-125, 127, 132, 154, 157-159, 166, 170-179, 181, 185, 187, 201, 203 and 216	The redacted information is hourly and task-specific pricing information from the experts	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party. <sup>1</sup>
2.	1.2-SEC-80	Summary of results from Enbridge Gas internal audits	Attachment 1, pages 1, 6, 9, 10, 11, 12, 13, 15 and 18.	The redacted information relates to security risks at certain Enbridge Gas sites – the locations of the sites is redacted	<p>This information relates to safety and security – there is potential risk to publicly identifying security risks at sites that are accessible to the public.</p> <p>This fits with item c) in the OEB’s Considerations in Determining Requests for Confidentiality (“whether the information pertains to public security or cybersecurity”).<sup>2</sup></p>

<sup>1</sup> These are noted as items #1 and 2 in the “Categories of Information that Will Presumptively Be Considered Confidential”, as found at Appendix B to the OEB’s Practice Direction on Confidential Filings.

<sup>2</sup> Appendix A to the OEB’s Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
3.	1.10-SEC-18	Enbridge Gas “Clean Fuel Regulation” (CFR) presentation (presented to Energy Transition Steering Committee on October 20, 2021)	Attachment 2, pages 9-10	The redactions are volume and pricing information about CFR credits.	<p>The market for CFR credits is in its infancy and releasing the volume of credits that Enbridge Gas expects to generate or the potential sale price of CFR credits in a developing and illiquid market puts Enbridge Gas at a disadvantage competitively when negotiating sales.</p> <p>This fits with item a) in the OEB’s Considerations in Determining Requests for Confidentiality (“the potential harm that could result from the disclosure of the information, including ... (i) prejudice to any person’s competitive position”).<sup>3</sup></p>
4.	1.11-ED-77	Table setting out details of ex-franchise contracts on Dawn-Parkway System, including information about contracted capacity and peak capacity utilized (summer and winter) for past 5 years	Attachment 1, pages 1 and 2 (columns on right side of table)	The redactions are for the cells of the table showing actual capacity utilized (GJ/d) under customer contracts on the peak summer day and peak winter day over the past 5 years.	<p>This is customer-specific information outside of the Storage and Transportation Access Rule (STAR) reporting requirements which relate only to contract parameters, not usage information.</p> <p>This is information that the OEB has indicated will be presumptively considered to be confidential – Information that would disclose load profiles, energy</p>

<sup>3</sup> Appendix A to the OEB’s Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
					usage and billing information of a specific customer that is not personal information. <sup>4</sup>
5.	1.12-FRPO-18	List of all change order submissions by the contractor and the decision for each change order by project management in relation to the Sudbury Replacement project (Attachment 1) and detailed calculations leading to the final invoice amount (Attachment 2)	Attachment 1 and Attachment 2.	The redactions are for contractor pricing information and profit margin calculations.	<p>This is information about specific contract pricing details and terms for the Sudbury Replacement project. It also includes information about the contractor's profit margin. This information is confidential information from the contractor. Disclosing the information will make negotiations and contracting more difficult in the future as contractors expect that their pricing details and negotiations and profit information will be held in confidence.</p> <p>This fits with item a) in the OEB's Considerations in Determining Requests for Confidentiality ("whether the information could impede or diminish the capacity of a party to fulfill existing contractual obligations" and "whether the information could</p>

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<sup>4</sup> This is item #3 in the "Categories of Information that Will Presumptively Be Considered Confidential", as found at Appendix B to the OEB's Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
					interfere significantly with negotiations being carried out by a party"). <sup>5</sup>
6.	1.12-SEC-92	Post-Construction Financial Report for EGD GTA Project	Attachment 1 pages 134 and 141-142	The redactions are for contractor pricing information.	<p>This is information about the bids and specific contract/compensation request amounts from a contractor on the GTA Project. This may show confidential information from the contractor. Disclosing the information will make negotiations and contracting more difficult in the future as contractors expect that their bids and negotiations will be held in confidence.</p> <p>This fits with item a) in the OEB's Considerations in Determining Requests for Confidentiality ("whether the information could impede or diminish the capacity of a party to fulfill existing contractual obligations" and "whether the information could interfere significantly with negotiations being carried out by a party").<sup>6</sup></p> <p>These redactions were previously accepted by the OEB when the Post-Construction Financial Report was originally filed.</p>

<sup>5</sup> Appendix A to the OEB's Practice Direction on Confidential Filings.

<sup>6</sup> Appendix A to the OEB's Practice Direction on Confidential Filings.



	<b>Exhibit</b>	<b>Description of Document</b>	<b>Confidential Information Location</b>	<b>Brief Description</b>	<b>Basis for Confidentiality Claim</b>
7.	1.12-SEC-94	Retainer agreement with KPMG re review of governance/controls for GTA project	Attachment 1, pages 17, 18 and 19	The redacted information is hourly and task-specific pricing information from the experts.	See #1 above.
8.	2.6-CCC-49	Tables setting out values used in Enbridge's Enterprise Value Framework	Page 3	The redacted information sets out the specific values used by Enbridge (across multiple business units) in determining outputs from the risk matrix.	<p>Enbridge has invested heavily to develop an industry leading approach for the application of its value framework which aims to support and improve Enbridge's relative competitiveness in its various business units (BUs). Sharing this information could prejudice the commercial position of the other BUs who leverage this framework and operate in a competitive environment; and could produce significant financial loss where other operators leverage the information to improve cost effectiveness and out-compete Enbridge in opportunities to provide services to existing and new customers.</p> <p>This fits with item a) in the OEB's Considerations in Determining Requests for Confidentiality ("the potential harm that could result from the disclosure of the information, including: i. prejudice to any person's competitive position; iii. whether the information could interfere significantly with negotiations being carried out by a party; and (b) whether the information consists of a trade secret</p>

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
					or financial, commercial, scientific, or technical material that is consistently treated in a confidential manner by the person providing it to the OEB.”) <sup>7</sup>
9.	2.6-ED-100	Documented risk factors for the Wilson Avenue Replacement Project	Attachment 2, Page 2	The redacted information is names of specific customers.	<p>Customer names are treated as confidential under the Gas Distribution Access Rule (section 5) and the Natural Gas Reporting and Record Keeping Requirements (sections 1.6 and 2.3.17).</p> <p>This is information that the OEB has indicated will be presumptively considered to be confidential.<sup>8</sup></p> <p>It also fits with the factors the OEB will consider when determining confidentiality - whether the type of information in question was previously held confidential by the OEB; and whether the information is required by legislation to be kept confidential.<sup>9</sup></p>

<sup>7</sup> This is noted as items (a) and (b) in the “Considerations in Determining Requests for Confidentiality”, as found at Appendix A to the OEB’s Practice Direction on Confidential Filings.

<sup>8</sup> This is noted as item #11 in the “Categories of Information that Will Presumptively Be Considered Confidential”, as found at Appendix B to the OEB’s Practice Direction on Confidential Filings.

<sup>9</sup> This is noted as items (e) and (f) in the “Considerations in Determining Requests for Confidentiality”, as found at Appendix A to the OEB’s Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
10.	4.4-VECC-56	Central Function cost pool data details for 2018-2023	Page 2, Table 2	The redacted information is details of the annual costs for each Enbridge Inc. central function (16 items) by year from 2018 to 2023.	<p>This is disaggregated non-public financial information of an unregulated entity (Enbridge Inc.) that is a reporting issuer. Public disclosure of such financial information outside of prescribed financial reporting mechanisms may provide information not otherwise available. EI has many subsidiaries and varied business interests to manage and public disclosure of such cost information may prejudice the competitive position and negotiations of EI and its subsidiaries and business partners.</p> <p>This is information that the OEB has indicated will be presumptively considered to be confidential – non-public financial statement of an unregulated affiliate engaged in competitive business activity.<sup>10</sup></p> <p>This also fits with item a) in the OEB's Considerations in Determining Requests for Confidentiality – ("the potential harm that could result from the disclosure of the information, including: i. prejudice to any person's competitive position; ii. whether the information could impede or diminish the capacity of a party to fulfill existing contractual obligations; iii. whether the information</p>

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<sup>10</sup> This is item #5 in the "Categories of Information that Will Presumptively Be Considered Confidential", as found at Appendix B to the OEB's Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
					could interfere significantly with negotiations being carried out by a party.”) <sup>11</sup>
11.	5.3-STAFF-218	Backup data and underlying calculations for Figure 19 from Exhibit 5, Tab 3, Schedule 1 (the Concentric Energy Advisors Common Equity Ratio Study)	Attachment 1	The document is a data set from S&P Global Ratings, purchased by Concentric. The entire document has been redacted, except for the Terms of Use statement (representative example left unredacted).	<p>The terms of use from S&amp;P Global Ratings indicate that no content may be reproduced or distributed without the written consent of S&amp;P. Concentric has only received consent for the content to be filed confidentially.</p> <p>The data set is information that the OEB has indicated will be presumptively considered to be confidential – underlying dataset and/or model of a consultant retained by a party.<sup>12</sup></p> <p>Additionally, the redacted information also fits with one of the factors the OEB will consider when determining confidentiality - whether the information consists of a trade secret or financial, commercial, scientific, or technical material that is consistently treated in a confidential manner by the person providing it to the OEB.<sup>13</sup></p>

<sup>11</sup> This is noted as item (a) in the “Considerations in Determining Requests for Confidentiality”, as found at Appendix A to the OEB’s Practice Direction on Confidential Filings.

<sup>12</sup> This is noted as item #7 in the “Categories of Information that Will Presumptively Be Considered Confidential”, as found at Appendix B to the OEB’s Practice Direction on Confidential Filings.

<sup>13</sup> This is noted as item #7 in the “Categories of Information that Will Presumptively Be Considered Confidential”, as found at Appendix B to the OEB’s Practice Direction on Confidential Filings.

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
12.	5.3-IGUA-61	Data and workpapers used to calculate all of the reported credit metrics for each company included in each proxy group in Figures 34 and 35 from Exhibit 5, Tab 3, Schedule 1 (the Concentric Energy Advisors Common Equity Ratio Study)	Attachment 1	The document is a data set from S&P Global Ratings, purchased by Concentric. The entire document has been redacted, except for the Terms of Use statement (representative sample left unredacted).	See #11.