

Elson Advocacy

November 20, 2023

BY RESS

Nancy Marconi

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

Re: EB-2023-0200 – Enbridge Gas Inc. – Uxbridge Gas Expansion Project

I am writing on behalf of Environmental Defence to provide submissions on the need for a technical conference in this matter. Environmental Defence requests that a technical conference be held in this matter. In the interest of efficiency, Environmental Defence proposes that a single technical conference be held for all of the ongoing Enbridge gas expansion projects. In the meantime, we propose that this proceeding be held in abeyance for the same reason the Bobcaygeon gas expansion project proceeding was held in abeyance.

Environmental Defence has questions for a technical conference to follow up on Environmental Defence interrogatory numbers 2, 4, 12, 22, 25, 27, 28, 31, and 41. To provide one example, Environmental Defence has questions regarding Enbridge's average use assumptions. Enbridge appears to assume an average use of 2,778 m³/yr for residential customers for the purpose of calculating its revenue forecast. (per I.ED-25). In contrast, the actual average use for Enbridge customers in gas expansion areas is about 2,350 m³/yr – 15% lower than the assumptions underlying the project economics in this case (per I.ED-39). That could mean that the revenue forecast is roughly 15% higher than will actually materialize based on the average use differential alone (i.e. even assuming that all the forecast customers do actually connect). This is particularly concerning because existing customers bear the risk of average use being lower than forecast with respect to standard distribution charges (per I.ED-41). Among other things, we would like to explore further why Enbridge is assuming average use for residential customers that is considerably higher than it is actually seeing among its existing customers.

Yours truly,



Kent Elson

cc: Parties in the above proceeding