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KITCHENER UTILITIES

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BY RESS FILING

14 December 2023
Ontario Energy Board
Attn: Ms. Nancy Marconi, Registrar
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario, M4P 1E4

Dear Ms. Marconi:

Re: EB-2022-0157 – Enbridge Gas Inc. (“Enbridge Gas”). – Panhandle LTC
Application - argument of City of Kitchener (“Kitchener”)

Pursuant to the Ontario Energy Board’s (“Board’s”) procedure order 8 dated October 30, 2023, in the above-noted proceeding, please find enclosed the submission to Enbridge Gas, on behalf of Kitchener.

Sincerely,

Khaled Abu-Eseifan
Manager, Gas Supply & Engineering

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15 (Schedule B); and in particular section
90(1) and section 97 thereof;

AND IN THE MATTER OF an Application by Enbridge Gas
Inc., for an order granting leave to construct natural gas
pipelines in the Municipality of Chatham Kent and Essex
County

ARGUMENT
OF THE
CORPORATION OF THE CITY OF KITCHENER – KITCHENER UTILITIES

December 14, 2023

A. INTRODUCTION

Enbridge Gas Inc. (“EGI” or Enbridge Gas”) filed an application with the Ontario Energy Board (“OEB”) on June 10, 2022, for an order granting leave to construct natural gas pipeline and associated facilities in the Municipality of Chatham Kent and Municipality of Lakeshore

EGI filed its Argument-in-Chief on November 30, 2023 (“AIC”).

The following are the submissions of the Corporation of the City of Kitchener (“Kitchener”) with respect to the unsettled issues in the Settlement Proposal.

B. KITCHENER’S POSITION

- Kitchener is currently not served by the Panhandle system; and nor does it get any benefit from this project.
- Based on the current OEB approved cost allocation methodology for the Panhandle system, Kitchener does not get any cost allocated from the project
- However, based on decision of EB-2022-0200 application, phase 3 review of cost allocation methodology, Kitchener may get cost allocated from the Panhandle system and the above project.
- Based on evidence, Kitchener understands that the project does not meet the E.B.O. 134 stage 1 test requirement by \$150 M.
- EGI’s proposal is to recover the shortfall revenue from existing customer based on cost allocation methodology. This may impact Kitchener in the future and that is why it is important for Kitchener that this cross subsidy is minimized.
- Kitchener’s position is that customers who will directly benefit from the project, should pay CIAC to cover the shortfall in revenue. Customers who need additional capacity should be able to get it provided that they pay for it.
- Kitchener is not submitting any argument in the above application as other interveners with similar positions are providing arguments to support this position. Kitchener supports those arguments that are aligned with its view.