



Ontario  
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**BY EMAIL**

March 13, 2024

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4  
[registrar@oeb.ca](mailto:registrar@oeb.ca)

Dear Ms. Marconi:

**Re: Ontario Energy Board (OEB) Staff Comments  
EPCOR Natural Gas Limited Partnership- 2024 April QRAM  
OEB File Number: EB-2024-0100**

On March 8, 2024, EPCOR Natural Gas Limited Partnership (EPCOR) filed its April 2024 QRAM application for South Bruce (Application). In the Application, EPCOR provided details with respect to two errors that were made historically. The first error is a reference price error in which EPCOR applied the incorrect reference price to the October to December 2023 volumes in the Purchased Gas Commodity Variance Account (PGCVA) (Reference Price Error). This error was made in the January 2024 QRAM application.<sup>1</sup> The second error was a billing error whereby approximately 75 customers were incorrectly billed for lower volumes during the period April 2021 to January 2024 (Billing Error).

On March 11, 2024, OEB staff asked questions regarding the Reference Price Error and the Billing Error. On March 12, 2024, EPCOR filed its responses to OEB staff's questions.

In its Application, EPCOR proposes to correct the Reference Price Error by changing the reference price applied to the October to December 2023 volumes from \$0.179429/m<sup>3</sup> to the correct approved reference price of \$0.161348/m<sup>3</sup>.<sup>2</sup> In its

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<sup>1</sup> EB-2023-0338

<sup>2</sup> EB-2024-0100, Application, p. 11

responses to OEB staff questions, EPCOR appears to propose that the error be corrected by applying a debit of \$71,138 to the Purchase Gas Commodity Variance Account.<sup>3</sup> Using either methodology to correct the error, OEB staff notes that the annual bill impact for a typical residential customer purchasing its gas from EPCOR is a debit of \$14.62 (or 0.8%).<sup>4</sup>

The Billing Error was caused by an incorrect programming of a digital encoder receiver transmitter. In its responses to OEB staff questions, EPCOR proposed that the year-to-date Gas Purchase Rebalancing Account balance ending March 2023 should be credited \$5,841.56.<sup>5</sup> EPCOR also applied billing adjustments to the 75 customers to recover the additional amounts owed.<sup>6</sup> If the proposal to correct the Billing Error is approved as filed, the annual bill impact for a typical residential customer purchasing its gas from EPCOR is a credit of \$11.21 or (-0.7%).<sup>7</sup>

OEB staff submits that the OEB should approve the Application as filed on an interim basis only and that a separate proceeding be established for further discovery and argument with respect to the two errors. Among other things, OEB staff notes that it has further questions that it would like to ask EPCOR and submits that the issue of whether EPCOR should be allowed to recover the \$71,138 amount resulting from the Reference Price Error should be addressed by a panel of Commissioners.<sup>8</sup>

In light of the accelerated timelines applied to QRAM applications, OEB staff requests that EPCOR reply to OEB staff's comments, if it so chooses, no later than March 15, 2024.

Yours truly,

Arturo Lau  
Case Manager

c: All Parties in EB-2024-0100

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<sup>3</sup> EB-2024-0100, EPCOR Responses, Staff.1(f)

<sup>4</sup> EB-2024-0100, EPCOR Responses, Staff.1(h)(excel spreadsheet)

<sup>5</sup> EB-2024-0100, EPCOR Responses, Staff.2(b)(ii). OEB staff notes that the table provided, at the same response, shows a different figure (\$4,841.45).

<sup>6</sup> EB-2024-0100, EPCOR Responses, Staff.2(b)(iii).

<sup>7</sup> EB-2024-0100, EPCOR Responses, Staff.2(e)(excel spreadsheet)

<sup>8</sup> OEB staff notes that the OEB has an established [policy](#) with respect to the retroactive correction of errors in pass-through accounts.