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June 13, 2024

Nancy Marconi
Registrar, Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2024-0067 – Enbridge Gas 2024 Annual Update to 5 Year Gas Supply Plan
Energy Probe Question for the Stakeholder Conference**

Energy Probe thanks Enbridge Gas for not objecting to its late intervention and the OEB for approving it.

Energy Probe has reviewed the Enbridge Gas 2024 Annual Update and has only one question. It is related to Section 4.5 Storage Portfolio, page 43 and to Section 3.1 Demand Forecast, page 23.

Energy Probe 1

Preamble: *“In accordance with the Natural Gas Electricity Interface Review (NGEIR) Decision and confirmed in the OEB’s Decision and Order regarding the amalgamation of EGD and Union and the associated rate-setting mechanism (MAADs decision), the amount of cost-based storage reserved for EGD rate zone customers is 99.4 PJ and 100 PJ is reserved for Union rate zone customers.*

Table 6 illustrates the in-franchise storage requirement for each rate zone. As outlined in Table 6, the Union rate zone in-franchise storage requirement has increased as a result of the increasing demand forecast discussed in Section 3.1.”

Table 1 on page 23 shows the annual demand forecast for the EGD **increasing** from 455,959 TJ/d in 2023/24 to 458,456 TJ/d in 2027/28. The same table shows the annual demand forecast for the Union South **decreasing** from 232,071 TJ/d in 2023/24 to 229,805 TJ/d in 2027/28.

Question:

The explanation for the increase in Union in-franchise storage requirement shown in Table 6, *Storage Requirement Forecast* on page 43 does not seem consistent with the information in Table 1, *Annual Demand Forecast* on page 23. Please explain why in Table 6, *Storage*

Energy Probe Research Foundation 417 Bloor Street West, Suite 202, Toronto, Ontario, M5S 1X6

Requirement Forecast there is **no increase** in the EGD *in-franchise Customer Requirement* from 2023/24 to 2027/28 when there is an **increase** in annual customer demand shown in Table 1 *Annual Demand Forecast* for the same period, while there is an **increase** in the Union *in-franchise Customer Requirement* from 88.6 PJ in 2023/24 to 89.9 PJ in 2027/28 in Table 6 *Storage Requirement Forecast* considering there is a **decrease** in the annual customer demand shown in Table 1.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Arturo Lau (OEB Staff)
Enbridge Gas Regulatory Proceedings