

REF: 2024 GSP UPDATE

Preamble: We would like to understand better EGI's storage plan to meet seasonal and peak day needs.

- 1) For each of the respective EGD and Union South rate zones, please provide:
 - a) The month-end storage balance position for annualized gas year (Nov. – Oct.) based upon the deliveries and consumption currently in the Gas Supply plan.
 - i) Please provide the numeric amount and graph.
 - b) For each of the last 5 years, please provide the actual month-end storage balance positions.
 - i) Please provide the numeric amounts and a range graph (highest and lowest balances) with forecasted amounts overlayed on the range graph.
 - ii) Please provide the forecast and actual monthly amounts of Dawn-delivered (sourced and purchased at Dawn without transport) for each of the respective years.

Preamble: TCPL Transport Open Seasons

- 2) Please confirm EGI's understanding of the amount of available capacity on the Northern Ontario Line.
- 3) Has EGI merged any of its TCPL contracts to the TCPL Eastern Delivery Area or optimized its STS contracts to reduce costs and UFG? Please describe what has been done and what limitations EGI must overcome to reduce ratepayer cost.

PG. 16

- 4) Did Vector hold an open season on eastbound capacity to Dawn? If so, was it binding and did EGI bid into the open season? Please update accordingly.
- 5) Please provide an update on EGI's open season and reverse open season for Dawn (Facilities) to Dawn (Vector).
 - a) Please explain the potential benefits of this capacity to support deliveries to the Sarnia Industrial Line (possibly respond in conjunction with Question 12 for context).

PG. 19

- 6) Please provide the current amount of Dawn LTFP that is still contracted to Dawn.

PG. 20

- 7) EGI states that it uses a regression analysis in its demand forecast with an escalating carbon price. Please provide the effects of the increase of \$15 per tCO₂ on the demand forecast over each of the next 5 years.
- a) Please file the regression analysis and the resulting changes in the demand forecast.
 - b) What implications does the demand forecast change have on the Gas Supply Plan.

PG. 26, Table 4

- 8) Do the 2024 Design Day Demands Forecasted include recent consideration of Energy Transition as informed by the Board's Rebasing decision and as seen in IRP analysis.

PG.27, TABLE 5

- 9) Table 5 depicts a much lower proportion of WCSB to the Union North East relative to EGD even though TCPL must be used. Is Union North East bearing additional costs of STS withdrawal premiums or Enhanced Market Balancing Services relative to STS?
- a) How are those costs considered in a Transport Cost Analysis

PG. 31

- 10) Is it EGI's intent to extend the Panhandle Eastern contract to Ojibway? If not, please explain while addressing the utilization of utility-controlled deliveries as an IRPA.
- a) Using the unit cost of the new Panhandle project (PREP) to meet Panhandle demand (annualized revenue requirement/total incremental demand from the project), what is the annual value of the existing deliveries.

PG. 32

- 11) Please confirm that the 3-year contract from Union Parkway Belt to Enbridge CDA is FT-NR (non-renewable).
- a) Please explain why this capacity does not appear on the Future CDE table on TCPL's Customer Express website.

- b) What is the existing demand and capacity of the Dawn Parkway system? Please clarify the method of determination of demand and capacity.
- c) Prior to any Dawn Parkway build, will EGI look at offering at commitment credit at Kirkwall? If not, why not?

PG. 33 and 38-42 & EB-2023-0072 EGI_ReplySUB_20230828, PG.11-12

Preamble: Last reference states: *Enbridge Gas requires all of its upstream transportation contracts on NEXUS, Vector, and Great Lakes to flow on the SIL on design day in order to meet market demands of the Sarnia system. This includes the new capacities contracted in 2021.*²⁶

... for example, when Enbridge Gas temporarily assigns its Vector contracts but also transacts for an exchange of gas from Chicago to the Enbridge Gas system.

²⁶ Exhibit I.IGUA.1, part b) and EB-2019-0137 Enbridge Gas 5 Year Gas Supply Plan, pp. 91-94.

- 12) Please provide a map of the area that includes the Sarnia Industrial Line (SIL) and all transportation and storage pipelines that feed into the system.
 - a) Please provide an overview of how these pipelines contribute to:
 - i) The SIL design day
 - ii) The emptying or filling of storage (e.g. Payne pool, others?)
 - b) Please provide a description of how the contracting of crossings at Bluewater and St. Clair contribute to:
 - i) The Gas Supply plan
 - ii) The SIL system operations (including how gas from Nexus is delivered in this process)
 - c) Please describe the purchase of “an exchange of gas from Chicago to the EGI system” as included in the above reference.
 - i) Please ensure a description of the accounting for the cost of the:
 - (1) Exchange
 - (2) The Vector transport cost
 - (3) The revenues associated with the assignment of Vector transport
 - ii) Please quantify each of the above values for the annual period of 2023.
 - iii) Please describe why any of the above costs are not considered distribution costs in support of SIL by avoiding facilities costs.

PG. 43 Table 6

- 13) Please provide the determination of the EGD In-franchise Customer Requirement
- a) Please provide the monthly data that supports this determination including any assumptions included in the calculation.
 - b) How does EGD storage maintain its integrity without an allocation of system integrity space in the fall?

PG. 44

- 14) Are there any barriers to EGI using in-path diversions to feed former Union North territories in a different TCPL delivery area.
- a) How has EGI planned for these opportunities in determining traditional Union North supply?

PG. 50, Table 10

- 15) Please explain why EGI persists in using an Average Cost/Customer Impact on its entire portfolio as opposed to the narrower impact on costs to serve customers in the specific area (e.g., EGD CDA, UG EDA, etc.).

PG. 51

- 16) Please explain why EGI limits the supply of third-party services to 2% of the design day.

PG. 52 & 56

- 17) Please explain why EGI evaluates Short-haul supply: Iroquois as neutral for diversity in Table 12 for the EGD EDA.
- a) Why is the same supply evaluated as high for the UG EDA?

PG. 59

- 18) Please provide a more fulsome description of the capabilities of the LNG facility to assist in meeting peak day requirements in the Union NDA.

PG. 64, Table 22

- 19) Please provide the primary drivers behind the demand increase of 137 TJ/day between 2025/26 and 2026/27.
- 20) The reference table shows an almost 80% increase in the Supply Asset Ontario Parkway between 2025/26 and 2026/27.
- a) Please clarify if this supply is landed gas delivered by a third party at Parkway or other.
 - i) If this supply is being delivered by Dawn-Parkway, please provide the current capacity of the Dawn-Parkway system and the current contracted demand for the winter of 2024/25.
- 21) Over the period of 2023/24 to 2027/28, the chart shows an increase of supply from storage of 181 TJ/day or almost 10% more than 2023/24. Please clarify:
- a) How EGI is planning on meeting this level of supply increase from storage on a peak day.
 - b) Given that EGI is proposing to allocate the unutilized legacy UG utility storage to the legacy EGD rate zone, how will the incremental deliverability be obtained.

PG. 70, Table 27

- 22) Please describe precisely the transportation path that is contracted in the first line called Bluewater.
- a) Please ensure that the description includes upstream pipelines that are contracted to feed that location from Michigan.
 - b) Does the contract provide bi-directional flow on a firm basis?
 - c) What is the total capacity of that segment of pipeline?
 - d) Why did last year's update not explicitly indicate the plan to extend the expiring contract as the evidence for this year does?

PG. 72

- 23) For the Gas Supply Plan Execution, using the last winter of 2023/24, what significant adjustments were made and when to adjust to lower consumption and the resulting storage levels relative to plan.

PG. 74

24) Please explain how EGI as system operator manages UFG for all rate zones.

PG. 78-79, Tables 30 & 31

25) Please confirm the 12-month period as the annual cycle for this table.

- a) For 2020/21, please explain the significant differences between Actual and Plan for:
 - i) Union North West -WCSB
 - ii) Union North East – Dawn
 - iii) Union South – Dawn
 - iv) Please clarify how the differences in WCSB for Union North West impacted UFG.
- b) Please contrast and compare to 2021/22

PG. 80

26) For the 161 days of failed supply, please provide the details between pipeline failure and supplier failure to deliver.

- a) Please describe the lessons learned and the impact on suppliers for future procurement.

APPENDIX D & F

27) Please provide the source of the Basis Differential for Dawn in the GLGT Renewal (i.e., supplied by ICF Q3 2023 or other) in Appendix D.

- a) Please provide the **actual** Basis Differential at Dawn over the last:
 - i) 5 years
 - ii) 10 years
- b) Please provide the material drivers behind this significant increase in Basis Differential from historical values
- c) Please compare with the value at Dawn in Appendix F with reasons for the difference during the respective terms being considered
- d) If the value used for the Basis Differential for Dawn in Appendix D is indeed an error, please provide a revised copy for presentation in the stakeholder meetings.

APPENDIX G

Preamble: The Appendix presents considerable data of select time frames and graphical comparisons which make differentials difficult to quantify given the scale of the respective pictorials. The decision to extend existing contracts and enter into additional contracts on Vector between Chicago and Dawn were based upon values presented in Appendix G for the period of Nov. 21 forward. This Appendix cited ICF's Q1 2021 Base Case. To try to present simple quantifiable data, we request the following:

- 28) Please provide a table for each of Nov.– Oct. 2021/22 & 2022/23 and Nov.-Apr. 2023/24 which shows:
- a) The basis differential between Chicago & Dawn for each year forecast in the Q1 2021 Base Case
 - b) The forward market differential between Chicago & Dawn from a published source
 - c) The actual day-ahead market differential between Chicago & Dawn from a published source
 - d) Using whatever term and timing that EGI uses to enter an exchange between Chicago and Dawn in conjunction with the assigned capacity, what the actual differential was for these exchange contracts for the above annualized periods

- 29) In the conclusion on page 34, the report states:

ICF's assessment of natural gas markets in and around Chicago and Dawn documented in this report indicates that the divergence of the futures prices from the day-ahead price reflects a risk premium that is currently much greater in the Chicago market than in the Dawn market.

The current risk premium observed in the Chicago futures prices reflects recent experience by the market participants in the Chicago market, including major and unexpected, albeit short term spikes in prices resulting in large financial losses by many of the participants in this market.

Given this conclusion, please explain which of the above differentials in question 28 would be exposed to this risk premium and what are the ratepayer consequences resulting from this premium, where applicable.

APPENDIX K

- 30) In Table 1, EGI calculates the forecasted Premium or Discount flowing from Contracting decisions.

- a) For the Nexus comparison, please present the value associated with the difference between Nexus and Rover.