

December 18, 2024

Sent by EMAIL, RESS e-filing

Ms. Nancy Marconi Registrar Ontario Energy Board 27-2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms. Marconi:

Re: EB-2024-0237 EPCOR Natural Gas Limited Partnership ("ENGLP") 2025 Federal Carbon Pricing Program Application Responses to OEB Staff Questions

Please find enclosed EPCOR Natural Gas Limited Partnership's responses to OEB Staff questions received regarding the above noted application.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

Tim Hesselink, CPA
Senior Manager, Regulatory Affairs
EPCOR Natural Gas Limited Partnership
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Encl.

EPCOR Natural Gas Limited Partnership (ENGLP) Responses to OEB Staff Questions EB-2024-0237

Staff Question-1

Reference(s): EB-2024-0237 Application and Evidence, Page 12

Preamble: On page 12 of the Application and Evidence, there is a discrepancy between the forecasted Aylmer "Eligible Greenhouse Certificate" volume of 3,356,827 m³ quoted in the second paragraph and the forecasted volume of 3,256,827 m³ in Table 1: Projected Aylmer Customer Costs.

Question(s):

a) Please confirm which is the correct forecasted volume. Please update the application and evidence, and any corresponding impacts accordingly.

ENGLP Response: The correct volume is 3,256,827m³ (Table 1 value). No changes to rates/ bill impacts are required as the Table 1 value is what was used for calculation purposes.

Staff Question-2

Reference(s): EB-2024-0237 Application and Evidence, Page 16

Preamble: In ENGLP's 2024 federal carbon application, ENGLP deferred the disposition of any deferral and variance account balances related to the Greenhouse Gas Pollution Pricing Act (GGPPA) until 2025 due to adjustments to the Customer Carbon Charge Variance Account (CCCVA) in 2022. In its current 2025 federal carbon application, ENGLP has deferred disposition once again due to further adjustments required as a result of ENGLP's review of internal CRA remittance processes related to GGPPA obligations.

Question(s):

a) In its prior and current federal carbon applications, ENGLP notes that it will defer disposition until all final adjustments are made. Please confirm when ENGLP anticipates completing the internal review process. Does ENGLP anticipate any further delays in being able to request the disposition of its deferral and variance account balances in its 2026 federal carbon application?

ENGLP Response: ENGLP anticipates all values to be corrected and updated for the December 31, 2024 regulatory accounting closure. We do not anticipate any further delays in being able to request the disposition of its deferral and variance account balances in its 2026 federal carbon application.

b) If ENGLP were to apply to clear and dispose of the deferral and variance account balances in its current 2025 federal carbon application, what would the balances in the deferral and variance accounts be as of December 31, 2024?

ENGLP Response:

As per ENGLP's Q3 2024 RRR filing:

- The Facility Carbon Charge Variance Account (FCCVA) reported balance was a credit of \$3,449.86.
- The Greenhouse Gas Emissions Administration Deferral Account (GGEADA) reported balance was a debit of \$19,330.60.

Significant deviations from these balances are not expected in Q4 2024.

Regarding the CCCVA, as adjustments are still in progress, the Q3 2024 RRR balance is not a reliable proxy. ENGLP expects the December 2024 balance to be less than \$50K.