

Richard Wathy Technical Manager Regulatory Applications Regulatory Affairs Cell: 519-365-5376 Email: Richard.Wathy@enbridge.com EGIRegulatoryProceedings@enbridge.com Enbridge Gas Inc. 50 Keil Dr. Chatham, Ontario N7M 5M1 Canada

VIA RESS and EMAIL

February 28, 2025

Nancy Marconi Acting Registrar Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, Ontario M4P 1E4

Dear Nancy Marconi:

Re: EB-2025-0078 – Enbridge Gas Inc. (Enbridge Gas) – April 2025 QRAM -Notice of Commodity-Related Price Increase Estimate for April 2025

The purpose of this letter is to inform the Ontario Energy Board (OEB) of the estimated change in the commodity portion of an average residential sales service customer's bill that is expected when Enbridge Gas files its April 1, 2025 Quarterly Rate Adjustment Mechanism (QRAM) application.

Based on preliminary estimates, Enbridge Gas has forecast that the gas commodity portion of the bill will increase by more than 25% for sales service customers in the EGD, Union North West, and Union South rate zones.

Enbridge Gas is planning to include a plan to mitigate the increase to an acceptable level with the April 1, 2025 QRAM application.¹ As a result of planned mitigation, customer bill impacts will be less than the impacts referenced in this letter.

Background

In its QRAM Review Decision (EB-2014-0199), dated August 14, 2014, the OEB determined that it:

...will require Enbridge, NRG and Union, one month in advance of the normal QRAM filing date, to complete a preliminary estimate of the change in the commodity portion of a typical residential system supply customer's bill that arises from the forecasted reference price (based on the most current 21-day strip available at the time) for the next quarter and the forecasted PGVA balances to be cleared. A gas distributor that anticipates an increase or decrease of 25% or more on the commodity portion of a typical residential system supply customer's bill (which includes all commodity related rate riders) must file a letter with the Board describing the anticipated increase or

¹ Less than 25% and 10% for the commodity and total bill of a typical residential customer, respectively.

decrease and the cost drivers underpinning the anticipated change. The letter must include information regarding the 21-day strip used and the forecasted PGVA balances that the distributor expects to clear.²

In accordance with the Decision, Enbridge Gas prepared a February 2025 estimate of the April 2025 QRAM impacts to the commodity portion of an average residential sales service customer bill.³ Based on the estimate performed, Enbridge Gas forecasts the commodity-related bill increase for a typical residential customer in the EGD, Union South, Union North West and Union North East rate zones to be between \$51 and \$118, (between 21% and 47%).⁴ This increase is primarily driven by the projected increase of the applicable reference prices for each rate zone.

Cost Drivers of the Commodity Bill Impacts

Of the estimated bill impact for a typical residential customer, the cost drivers are:

- 1. Increases related to the market price of natural gas, and
- 2. Increases related to the Purchase Gas Variance Accounts ("PGVA") riders.

1. Increase in the market price of natural gas

The prices used to set the gas commodity rates is forecast for April 1, 2025 to March 31, 2026 and is expected to increase between \$0.298/GJ and \$1.056/GJ from the prices approved by the OEB in the January 2025 QRAM. The annual bill impact for an average residential sales service customer is an increase of \$28 to \$90, depending on the customer's location.

2. Increases in the Purchased Gas Variance Account ("PGVA") riders

The projected April 1, 2025 PGVA riders are larger than the April 1, 2024 PGVA riders that expire with the April 1, 2025 QRAM. The impact of the expiring rider is included with the impact of the projected PGVA rider determined for the April 1, 2025 QRAM. The annual bill impact for an average residential sales service customer in all rate zones is a decrease of \$16 to an increase of \$28, depending on the customer's location.

Total Bill Impacts

In addition to the commodity-related impacts described above, the April 1, 2025 QRAM will also reflect non-commodity related QRAM changes, and the implementation of the rate impacts and one-time deferrals disposition amounts from the 2025 Federal Carbon Pricing Program application (EB-2024-0251)⁵.

² EB-2014-0199, Decision and Order, August 14, 2014, pp. 4-5.

³ February 2025 estimate based on a 21-Day strip of natural gas prices ending February 7, 2025.

⁴ A typical residential customer bill impact for the EGD and Union rate zones is based on annual consumption of 2,400 m³ and 2,200 m³, respectively.

⁵ Enbridge Gas is including the 2025 Federal Carbon Pricing Program application in the total bill impacts in anticipation of receiving approval by the end of February.

Please refer to Table 1 for detailed bill impacts by rate zone.

Line <u>No.</u>	Particulars (\$)	EGD	Union North West	Union North East	Union South
		(a)	(b)	(c)	(d)
	Commodity Bill Impacts				
1	Gas Commodity Reference Price	28	34	90	90
2	PGVA Riders	25	17	(16)	28
3	Total Commodity Bill Impact	54	51	74	118
4	Approved Commodity Bill - January QRAM	171	109	357	311
5	Commodity Bill Impact (%)	31%	47%	21%	38%
	Total Bill Impacts				
6	QRAM Non-commodity Impacts	65	21	9	0
7	2025 Federal Carbon	69	63	63	63
8	2023 Carbon Deferrals	2	1	1	1
9	Total Other Rate Changes	136	85	73	64
-		100			01
10	Total Bill Impact (line 3 + 9)	189	136	147	182
112	Approved Total Bill - January QRAM	1,280	1,143	1,437	1,143
123	Total Bill Impact (%)	15%	12%	10%	16%

Table 1 April 1, 2025 QRAM Estimate by Rate Zone

Customer Communication

In its EB-2014-0199 Decision, the Board determined that it:

...is of the view that additional information and education for customers would be beneficial, as well as earlier notification of a pending large increase. If an increase greater than 25% is anticipated on the commodity portion of a typical residential system supply customer's bill (which includes all commodity related rate riders), the distributor must use best efforts to ensure that its customers are made aware of the proposed price change through, for example, the issuance of a press release describing the anticipated increase, based on the preliminary estimate, and the cost drivers for it.⁶

Enbridge Gas plans to communicate the expected bill increases, which after mitigation will be less than 25% of the commodity portion of a typical residential customer's bill, effective April 1, 2025 to general service customers using the following methods:

⁶ EB-2014-0199, Decision and Order, August 14, 2014, p. 5.

- Enbridgegas.com a message on the homepage and a dedicated information page with FAQ's for both residential and small business customers.
- Social media post regarding the change in natural gas rates and directing customers to the dedicated information page.
- IVR messaging customers will hear a message about upcoming rate changes when they call the contact centres in April 2025.
- Contact Centres customer representatives provide ongoing support to customers through the year and are available to discuss rate changes and answer individual questions as required.

Enbridge Gas expects to file its April 1, 2025 QRAM application on March 11, 2025.

If you have any questions, please contact the undersigned.

Yours truly,

Richard Wathy

Richard Wathy Technical Manager, Regulatory Applications

c.c.: All Interested Parties EB-2008-0106, EB-2019-0137, EB-2024-0067, EB-2022-0200, and EB-2024-0111