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By email

March 17, 2024

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

Dear Ms. Marconi

Re: EB-2025-0078– QRAM April 1st, 2025

We are writing on behalf of Canadian Manufacturers & Exporters (“CME”). Please consider this correspondence as CME’s written comments regarding EGI’s QRAM Application, which seeks changes to its rates for the sale, distribution, storage and transmission of natural gas effective April 1st, 2025.

As the Board is aware, it is CME’s practice to conduct a due diligence of Union’s QRAM applications. We have done so in this case. We have the following question related EGI’s rate mitigation proposal:

- At Exhibit A, Tab 2, Schedule 2, p. 4 of 7, EGI stated that the QRAM is “intended to strike a balance between ensuring that consumers are receiving appropriate price signals which reflect the actual natural gas market price and protecting the interests of system supply customers by reducing, to some extent, volatility in the price of natural gas.”
- At Exhibit A, Tab 2, Schedule 2, p. 5 of 7, EGI stated that it considered other rate mitigation strategies, including a 24-month disposition period. EGI stated that it did not use a 24-month mitigation period, in part, because a “significant portion of the total bill impacts are a result of the increase in Federal Carbon and the company does not find it appropriate to smooth this over a 24-month period”

Accordingly, CME requests that EGI provide an answer to the following question:

- 1) Since increases to the federal carbon charge impact customers in the same way as increases to any market-based commodity price increase, and the point of the QRAM (regardless of the cause of increases) is to balance price signals with reduced cost volatility, why does EGI believe it is appropriate to discriminate as between causes of market price fluctuations in its mitigation plan responses?

CME requests an award of its reasonably incurred costs in connection with conducting its examination of EGI's QRAM Application.

Yours very truly

A handwritten signature in blue ink, appearing to read "Scott Pollock".

Scott Pollock

C. Vincent Caron (CME)