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March 25, 2025

**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-2025-0096: Quarterly Rate Adjustment Mechanism (“QRAM”) Application  
ENGLP Natural Gas LP (“ENGLP”) Southern Bruce for rates effective April 1, 2025  
Responses to OEB Staff Submission**

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Please find enclosed EPCOR Natural Gas Limited Partnership’s responses to OEB Staff’s submission received March 24, 2025, specifically to the comments/questions on page 4.

Please do not hesitate to contact me if you have any questions.

Yours truly,

Tim Hesselink, CPA  
Senior Manager, Regulatory Affairs  
EPCOR Natural Gas Limited Partnership  
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249-225-5104

## 1. Facility Carbon Charge:

*“OEB staff understands that only a portion of the costs recovered through Enbridge Gas’s facility carbon charge will be impacted by the amendment in federal regulations, whereas EPCOR’s carbon pricing costs currently recovered through the facility carbon charge are fully impacted by the amendment in federal regulations and will fall to zero. OEB staff request that EPCOR confirm this understanding as part of its responses to comments. OEB staff also request that EPCOR provide more details on how its facility obligations drop to zero in the Aylmer rate zone with the removal of the federal carbon charge and how the industrial emitter and provincial Emissions Performance Standards apply or not apply to EPCOR.”*

### **ENGLP Response:**

ENGLP confirms that its understanding of the federal regulation amendments align with OEB comments above - *EPCOR’s carbon pricing costs currently recovered through the facility carbon charge are fully impacted by the amendment in federal regulations and will fall to zero.*

ENGLP’s facility costs, which are the basis for the approved charge, are company use gas volumes for building heat and vehicles and not related to the Emissions Performance Standards.

Should ENGLP’s understanding of this matter be incorrect, ENGLP will continue to use the Facility Carbon Charge Variance Account (FCCVA) to track costs offset against the \$0.00 rate Facility Charge rate. As ENGLP’s projected facility costs for Apr 2025-Mar 2026<sup>1</sup> are less than \$5,000, the customer impacts would be minimal.

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<sup>1</sup> EB-2024-0237, Application, Page 14, October 15, 2024

## 2. Clearbeach Resources

On page 13 of the application, EPCOR states that it entered into a contract with Clearbeach Resources and is planning to flow gas under the contract beginning December 2024. OEB Staff requests that EPCOR update the application with the date that gas began to flow under the contract and confirm that these volumes are included in Schedule 6.

### **ENGLP Response:**

Gas began to flow under the contract on December 9, 2024. ENGLP confirms that the volumes are included in Schedule 6<sup>2</sup>.

## 3. RNG Pricing (Page 4)

OEB Staff requests that EPCOR confirm that the reference on page 17 of the application to RNG pricing should be for the period of April 1, 2025, through March, 2026 and not January 1, 2025 through December 2025.

### **ENGLP Response:**

Confirmed.

## 4. GPRA (Page 4)

On page 20 of the application, EPCOR states that the impact on the Gas Purchase Rebalancing Account (GPRA) from the change in the reference price is a debit amount of \$682,918.44, as shown on the December, 2024 line of column (K) in schedule 8.

OEB Staff requests that EPCOR confirm that the reference on page 20 of the application to the debit amount of \$682,918.44 in schedule 8 should be to the March, 2025 line of column (J).

### **ENGLP Response:**

Confirmed.

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<sup>2</sup> EB-2025-0096, Application (Amended), Page 13, Lines 6-8, March 20, 2025