

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

June 3, 2025

**EB-2025-0064 Enbridge Rebasing Application – Phase 3  
Pollution Probe Interrogatories**

Dear Mr. Murray:

In accordance with OEB direction, please find attached Pollution Probe's interrogatories to the Applicant. Pollution Probe has filed these early to be of assistance to Enbridge and all parties. Pollution Probe has also attempted to avoid some detailed question areas that we understand others intend to focus on.

Respectfully submitted on behalf of Pollution Probe.



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**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.  
Rebasing Phase 3**

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**POLLUTION PROBE INTERROGATORIES**

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**June 3, 2025**

**Submitted by: Michael Brophy  
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1.13-PP-1

The Phase 2 Rebasing (EB-2024-0111) Issues Lists included Issue #25:

*Has Enbridge Gas appropriately responded to relevant OEB directions and commitments from previous proceedings, including issues related to the IRP Framework?*

To provide Enbridge an opportunity to appropriately catalogue and report on its progress against all IRP requirements and OEB direction, the Phase 2 Settlement Agreement deferred the assessment of IRP to Phase 3 where Enbridge would report on the status of its responses to previous Integrated Planning requirements.

- a) Are there any IRP requirements that Enbridge has not met? If yes, please provide details.
- b) Does the evidence in Exhibit 1, Tab 13, Schedule 5 represent all the activities and outcomes Enbridge has done to meet the IRP requirements? If not, please provide details for any additional activities and outcomes that were not included in Exhibit 1, Tab 13, Schedule 5.

1.13-PP-2

Has Enbridge undertaken any continuous improvement, lessons learned or similar exercise to assess its implementation of IRP since 2021? If yes, please provide a copy of the internal reports, presentations or related materials.

1.13-PP-3

- a) Please provide the full list of all IRP projects included in the 2025-2032 Enbridge Asset Management Plan (AMP) and provide the AMP project reference number.
- b) Please provide the review and approval process for development and management approval (which could include the Board of Directors if applicable) of Enbridge's Asset Management Plan.
- c) Please provide all materials (e.g. memos, presentations, emails, minutes, etc.) related to review and approval of the most recently completed Asset Management Plan.

1.13-PP-4

- a) Please provide details on all IRP projects completed to-date and what Capital expenditures have been deferred or avoided, per project.
- b) Please provide details on all IRP Pilot projects currently under development, in progress and completed.

1.13-PP-5

Reference: [EB-2022-0335 REVISED Final Transcript for EB-2022-0335 Technical Conference August 27 2024, Page 135, lines 16-26]

MS. GIRVAN: So what would be the purpose of filing it in the DVA ESM proceeding? Would it be just simply informational? Or would you be seeking input from intervenors and potentially the Board?

MS. MOORE: The purpose of a filing, the information in the annual report more broadly, is to provide information to all stakeholders as well as the OEB. And through that process, we could be asked questions on the annual report and this report on the pilot and its progress, more specifically, to address questions through that proceeding.

- a) In its annual DVA and/or ESM applications, does Enbridge request a review of its annual IRP Report? If not, why not? If yes, please provide the wording Enbridge used in recent annual DVA and/or ESM applications to request OEB review of the Annual IRP Report.
- b) What process is used to share the Annual IRP Report with all stakeholders, including those that do not participate in the annual DVA and/or ESM applications?

1.13-PP-6

Reference: **Stakeholder Outreach and Engagement Process:** Enbridge Gas will use a three-component stakeholder engagement process for IRP. This will involve: (1) gathering stakeholder insight from existing channels; (2) holding regional stakeholder days on an annual basis focused on system needs identified in the Asset Management Plan and options to address these needs through IRP; and (3) project-specific consultation for specific proposed IRP Alternatives or IRP Plans in a specific geographic region. [EB-2020-0091 dec\_order\_EGI\_IRP\_20210722, Page 7]

- a) Please provide a list of all regional IRP stakeholder sessions held since 2021 and indicate the attendance statistics for each session, plus provide all feedback received from each session.

- b) Please provide a copy of all the presentations use for the most recent IRP regional sessions for each region.
- c) For each region, please provide the project-specific details for specific proposed IRP Alternatives or IRP Plans in each specific geographic region (if this is included in the regional presentations, please just indicate which slide contains the information per regional presentation).
- d) Please provide a list of IRP alternatives developed based on stakeholder consultation in each region since 2021. Please include what Capital projects have been deferred or avoided due to those IRP alternatives.

#### 1.13-PP-7

##### References:

IRP Pilot Projects: “The OEB expects that two IRP pilot projects will be selected and deployed by the end of 2022 as proposed by Enbridge Gas.” [EB-2020-0091 dec\_order\_EGI\_IRP\_20210722, Page 9]

Ms. Moore: “ ...We don't feel a second [IRP] pilot is required to comply with the spirit of the OEB's expectation...”. [EB-2022-0335 REVISED Final Transcript for EB-2022-0335 Technical Conference August 27 2024, Page 142, lines 19-20]

- a) Please confirm if Enbridge still believes that it is complying “with the spirit” of the OEB’s IRP requirements if it does not develop and implement a second IRP pilot project. If Enbridge has changed its position, please explain why.
- b) Please confirm that Enbridge has not requested and received relief from selecting and deploying two IRP pilot projects by the end of 2022. If OEB relief has been granted, please provide a copy.

#### 1.13-PP-8

- a) Please provide a copy of the best detailed IRP assessment (or report) that Enbridge has undertaken and that included the full range of IRP alternatives being assessed.
- b) Please confirm that the South Lake Huron Pilot Project is the only IRP project (not including the cancelled Parry Sound Project) identified on the Enbridge IRP Website. If incorrect, please provide the screen shots showing the other IRP projects.

1.13-PP-9

Reference: Enbridge indicates that the lack of IRP alternatives identified "...reflects the inherent complexity of integrating IRP into existing systems and processes. Completing IRP evaluations for AMP projects is not a simple process with a set of consistent consecutive steps for each project. Instead, the IRP evaluation process is iterative in nature, often requiring previously completed IRP evaluations to be revisited due to the dynamic nature of facility planning." [1/13/5, page 3]

- a) Enbridge indicates that it has developed new IRP processes to help advance consideration of IRP. Please provide a copy of each new process developed, indicate when it was implemented and highlight the improvement compared to the previous process at Enbridge.
- b) Please provide the scorecard and/or performance metric for the most senior position at Enbridge that has accountability for IRP results and compliance.
- c) Please explain what controls are in place at Enbridge to ensure that each IRP process is followed accurately. If a process (or IRP requirement documented in other materials such as guidance) is not properly followed by a department, please indicate the process of what occurs (i.e. is there an investigation process, retraining requirement, etc.).
- d) Has an audit been conducted of the new IRP processes implemented at Enbridge? If yes, please provide a copy of the audit results (report, presentation and other relevant materials). If no, please explain why not.

1.13-PP-10

- a) Please provide copies of all guidance and training materials developed and delivered to Enbridge staff related to IRP requirements and advancing IRP alternatives. For each document, please provide a list of when it was delivered and how many staff from each department were trained. If other awareness and training activities have been conducted internally, please also provide details.
- b) Please provide copies of all feedback (including training surveys) from Enbridge staff on the guidance and training materials delivered.
- c) Please provide a list of improvements made to IRP guidance and training materials since 2021 based on feedback collected from Enbridge staff.

- d) Please provide copies of all audits and assessments of IRP undertaken by Enbridge to assess compliance, understanding or to identify and mitigate potential gaps in effective delivery of IRP in alignment with IRP requirements.

1.13-PP-11

Reference: Within this process, Enbridge Gas has prioritized the economic evaluation of investments in the AMP in two main ways. The first is a prioritization of investments with nearer term in-service dates, as this ensures that there is time to both evaluate and implement the optimal pipe and/or non-pipe alternative(s). The second is a prioritization of growth investments with higher capital requirements, as these may have higher IRP potential. [1/3/5, page 4]

- a) Enbridge has screened out near-term projects if they are needed in less than three years (including in OEB Leave to Construct applications). If Enbridge screens out projects based on timing, please explain how that increases IRP alternative focus on investments with nearer term in-service dates.
- b) Please describe the categories of projects included in the AMP (e.g. MANDATORY, COMPLIANCE, VALUE-DRIVEN) and those that are outside of the AMP (e.g. growth projects like expansion, CNG and RNG). Which of these categories pertain the growth projects?
- c) Please confirm that projects outside the AMP do not go through the IRP screening process.
- d) Please confirm that Mandatory and Compliance projects are not IRP screened or prioritized in the AMP, i.e. they attracting Capital first at a priority above Value-Driven projects that are IRP screened and prioritized. If incorrect, please explain.

1.13-PP-12

Please replicate the information in EB-2022-0200 Exhibit J12.2 for the current version of the AMP.

1.13-PP-13

Please provide an update on any requirements and progress on developing an IRP incentive for Enbridge IRP projects.

1.13-PP-14

Reference: "Enbridge Gas also believes that it would be premature and inefficient to focus on potential changes to the IRP Framework and evaluation process prior to the

economic evaluations being completed on the subset of investments that have passed the technical evaluation.” [1/13/5, page 5]

- a) Please provide Enbridge’s current estimate of how many IRP alternatives (not including the required pilots) will be executed by the end of this rate term in 2028.
- b) Given that there is always going to be a list of AMP potential projects under assessment for IRP for all future years, please explain why the OEB should refrain from making ongoing and regular enhancements to the IRP Framework, including at this time.
- c) What is Enbridge’s proposal (time and process) for when the OEB should make changes to the IRP Framework?

#### 1.13-PP-15

- a) Have any electric IRP alternatives being assessed have been rejected by any local electric distribution company? If yes, please provide details.
- b) Please provide specific details on the incremental “governance structures, processes, resources etc.” Enbridge needs to consider and implement electric IRP alternatives?
- c) Does Enbridge intend to provide a request to the OEB to implement “governance structures, processes, resources etc.” that it believes are needed for inclusion of (non-pilot) electric IRP alternatives? If yes, when is this proposed to be filed? If not, why not?
- d) Enbridge proposed to include electric IRP alternatives in the South Lake Huron Pilot Project (EB-2022-0335) and this was approved by the OEB. What additional “governance structures, processes, resources etc.” or Provincial planning policy changes were required to enable the use of electric IRP alternatives for this IRP pilot project?
- e) Please explain why electric IRP alternatives can be accommodated in South Lake Huron for IRP, but Enbridge believes that similar options cannot be considered as IRP options for other projects until there are Provincial policy changes and incremental resources provided to Enbridge.



1.13-PP-16

Enbridge has requested a one year roll-over of the DSM portfolio in EB-2024-0198. Will a one-year roll over delay the ability to apply enhanced DSM program measures for use in IRP as targeted DSM? If not, please explain how Enbridge could apply these incremental DSM options to IRP now rather than delaying them by over a year.

1.13-PP-17

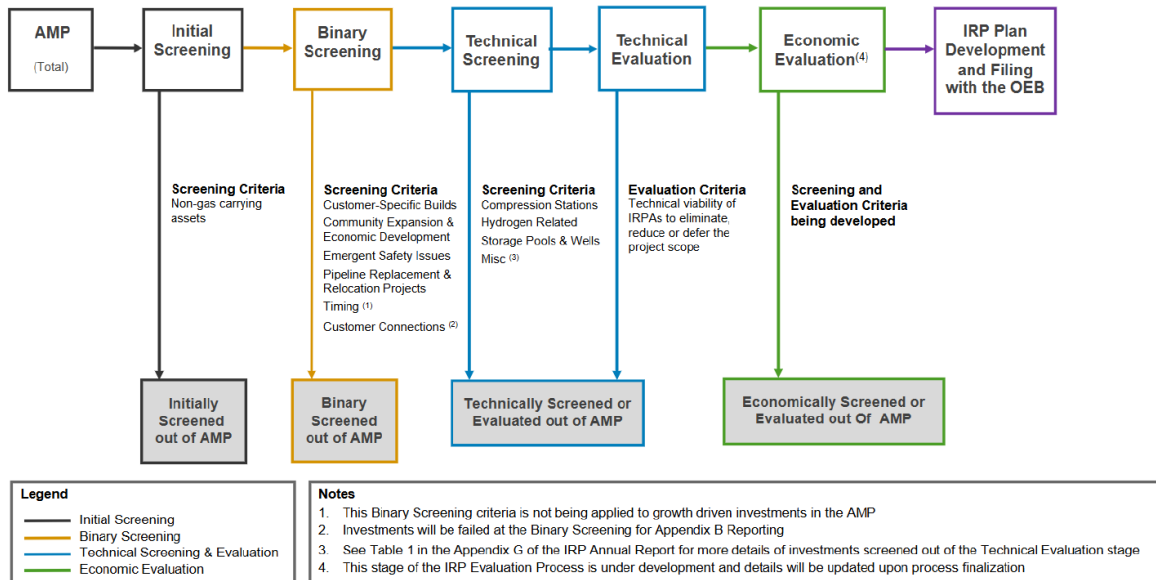
Reference: "The Government of Ontario is in the process of developing its first integrated energy resource plan which it plans to release in 2025, pending the outcome of the provincial election. The Company will adapt its IRP evaluation process within the context of the broader policy environment; however, it would be misaligned for the IRP Framework to evolve to include electric alternatives at this time, absent the issuance of integrated energy planning policy from the Government or the establishment of the above noted required associated elements to operationalize the policy." [1/13/5, page 6]

- a) Please provide a copy of all correspondence and materials (presentations, briefing notes, etc.) that Enbridge has provided to the Government of Ontario (including Ministries and subsidiary groups) related to the its integrated energy resource plan noted above.
- b) Please provide any materials which supports that the anticipated Government of Ontario integrated energy resource plan is on schedule and that it would include detailed information requiring changes to the OEB's IRP Framework.
- c) Please explain why Enbridge is contemplating changes to IRP (including processes) based on its interpretation of a future potential Government of Ontario integrated energy resource plan, rather than applying to the OEB to make changes to the DSM Framework to accommodate any appropriate changes. Does Enbridge expect that the future policy document it is anticipating will over-ride specific requirements in the IRP Framework?
- d) Please explain what Enbridge is expecting from Provincial policy that would provide detailed information or requirements for electric IRP alternative in specific local areas aligned with potential IRP projects. Would it not be more appropriate to consider the electric IRP alternatives based on specific local information like is currently the case?
- e) Does Enbridge believe that the OEB does not have authority to approve electric IRP alternatives at this time? If yes, please provide the basis for this restriction.

1.13-PP-18

Reference: Enbridge Current IRP Screening process.

Figure 1 – IRP Screening and Evaluation Process



- For each of the seven screening steps noted above and the four resulting categories at the bottom of the diagram, please provide an updated version including the number of projects that relate to each box, based on the most current AMP.
- For each of the seven screening steps noted above, please indicate how many FTE's from each department conduct each step.
- For each of the seven screening steps noted above, please indicate which Enbridge positions are responsible for the review and approval of recommendations for what projects make it to the next step or are screened out.

1.13-PP-19

Reference: "To date, the use of interruptible rates to address a system need/constraint has not been implemented as part of an IRP Plan." [1/13/5, page 11]

- Based on Enbridge's study and assessment, what changes to interruptible rates could be made to improve the uptake of these rates for IRP purposes?

- b) For harmonization of interruptible rates, what considerations been used to design harmonized interruptible rates in the manner that would incent a greater number of customers to use this IRP tool?
- c) Please provide what communication and marketing materials Enbridge uses to encourage customers to adopt an interruptible rate.
- d) In the case of the East Kingston Creekford Road Reinforcement project, the project was avoided due to validation of customer gas needs against assumptions that were in Enbridge's AMP. Is it reasonable to validate customer peak demand needs at the same time as going out to consult on interruptible rate options for customers when assessing project need and options? If not, why not.

#### 1.13-PP-20

Reference: Enbridge Gas was moving forward with an IRP Plan for the Owen Sound Reinforcement Project in Q4 2023 ... However, because of the SRP update noted above, the timing of the project was shifted from 2025 to 2031, thereby putting the development of the IRP Plan on hold. [1/13/5, page 19].

- a) Please provide the presentations to the OEB IRP Technical Working Group on the IRP options assessed for the Owen Sound Reinforcement Project. Please also provide a copy of any TWG comments or feedback.
- b) If the Owen Sound Reinforcement Project was initially estimated to be required in 2025, why was the IRP Plan only moving forward in December 2023. That does not appear to provide ample time to execute and validate results prior to the original 2025 estimate project need.
- c) Please explain what changed to enable Enbridge to delay the Owen Sound Reinforcement Project by six years?
- d) What is the revised estimated timing to complete and file the Owen Sound Reinforcement Project IRP alternative with the OEB based on the need to have the project developed, approved and implemented prior 2031?
- e) Did Enbridge ever posted any information for the Owen Sound Reinforcement Project on the IRP Regional Planning and Engagement webpage? If yes, please provide a copy. If no, why not.

1.13-PP-21

Reference: Enbridge Gas also initiated a competitive procurement process to retain an evaluation contractor to support the second IRP Pilot Project objective; to develop an understanding of how to effectively design, deploy, and evaluate ETEE and residential DR programs. [1/13/5, page 30]

- a) Please provide the status and outcomes of the IRP Pilot evaluation contractor procurement process undertaken in 2024.
- b) Please provide the scope of work and schedule for the IRP Pilot evaluation contractor.
- c) Was IESO included in the IRP Pilot evaluation contractor procurement process to align scope with IESO integrated energy planning needs and/or enable cost sharing? If no, why not. If yes, please provide details.

1.13-PP-22

Please provide the IRP Technical Working Group Report that correlates to the Enbridge IRP Report filed in Exhibit 1, Tab 13, Schedule 5, Attachment 1.

1.16-PP-23

Reference: [1/16/1, page 1]

In its Phase 1 Decision, the OEB directed Enbridge Gas to review the energy comparison information currently on its website and printed materials to determine whether it fully discloses what is being compared and on what basis, and what assumptions are being used for the comparison.

In the Phase 2 Settlement Agreement Enbridge Gas agreed to update all marketing materials that included energy comparisons. Enbridge Gas also agreed that updated materials shall be filed in Phase 3 of the 2024 Rates proceeding, or in a subsequent proceeding if not complete at that time.

- a) Are the materials included in Exhibit 1, Tab 16 intended to be a comprehensive set of the updated marketing and reference materials, or are there materials that are missing that will need to be filed and assessed at a later stage or in a different proceeding?
- b) Per the Phase 2 Settlement Agreement noted above, Enbridge agreed to cease using the current marketing and reference materials 45 days following filing of the settlement agreement. Please provide a copy of all correspondence and marketing

materials including information related to the benefits or relative cost-effectiveness of natural gas, since the restriction period came into effect.

- c) When does Enbridge propose to start using the new marketing materials filed in Exhibit 1, Tab 16?

1.16-PP-24

Reference: “Enbridge Gas intends to conduct a jurisdictional scan to review how other natural gas utilities present energy comparison data in their marketing materials and identify best practices. The Company will use this information to determine if further changes should be made, and will consider if additional energy technologies, such as, but not limited to, electric ccASHPs should be added.” [EB-2024-0111 Phase 2 E1/T16/S1, Page 23]

- a) Please provide an update on the review noted above and please provide copies of the materials (reports, presentations, etc.) resulting from the review.
- b) Please explain how the results of the review were included in the marketing and reference material updates.

1.16-PP-25

- a) Please provide details on the manner used to evaluate the old marketing materials and recommendations for the updates made, including the use of consultants.
- b) Please provide details on any third-party peer review done for the draft updated materials and underlying assumptions.
- c) As part of the OEB direction and Phase 2 Settlement Agreement, did Enbridge undertake a full analysis of energy options including an electric cold climate air source heat pump? If not, why not. If yes, please provide a copy of all materials related to the analysis.
- d) Was a consultant retained to provide services for the energy comparison analysis noted above. If yes, please provide the contract and reports/presentations issued.

1.16-PP-26

Is Enbridge still using the Guidehouse Pathways to Net-Zero Emissions for Ontario study filed in Phase 1 (EB-2022-0200) to support energy comparison and/or net zero emissions statements? If not, why not. If yes, please explain why.

1.16-PP-27

Reference: [1/16/1, Attachment 1, Page 1] – Updated Marketing Material

Lower carbon emissions\* - Natural gas is a more energy-efficient option compared to oil and propane.

- a) Why is information only provided for oil and propane under the “lower emissions” heading when electricity is noted in the first paragraph and electric cold climate air source heat pumps are a relevant option to consider.
- b) Please provide the source information used to validate the statement that “natural gas is a more energy efficiency option compared to oil and propane”?

1.16-PP-28

- a) Please explain why the following types of marketing materials were not updated and include in the evidence filed:

- Cost comparison chart for new or existing customers (an example is provided in EB-2023-0343, Exhibit B, Tab 1, Schedule 1, Attachment 5, but similar versions have also been filed in the Rebasing proceedings).
- Marketing materials used for system expansion projects.
- Survey materials used for system expansion projects (for example EB-2023-0261, Exhibit I.ED-32, Attachment 1, including Page 7 comparison chart and EB-2023-0261 Exhibit I.ED-45, Attachment 1).
- Marketing and communication materials like those provided in EB-2024-0111, Exhibit I.1.16-STAFF-8, Attachment 2.
- IRP marketing materials comparing energy use and related emissions information.

- b) What process does Enbridge plan to use for the update and filing of other marketing and reference material related to energy options and costs, not included in Exhibit 1, Tab 16 of this application?

1.16-PP-29

Reference: Examples of Enbridge marketing and references on energy and related emissions [EB-2024-0111, Exhibit JT1.44, Attachment 1]

- a) Has Enbridge reviewed the marketing and underlying energy/emission references for its communications campaign to update information in alignment with the OEB direction and the Phase 2 Settlement Agreement? If not, why not. If yes, please

provide the materials used for that analysis and indicate what changes have been made for statements in the marketing campaigns.

- b) Does Enbridge intend to use the term “net zero” to reflect the future of the natural gas system in its communications and advertising? If yes, please provide the current analysis that Enbridge is using to supports the net zero analysis.
- c) Has Enbridge continued to run the “tomorrow is on” campaign since the restriction period (45 days following filing of the Phase 2 settlement agreement)? If yes, please provide the schedule and location of the campaign runs since that time and a copy of the materials used.

#### 1.16-PP-30

Reference: Energy and emissions comparison reference material used to support system expansion projects [EB-2024-0111, Exhibit I.1.16-ED-18, Attachment 2, Page 18]

- a) Please provide the current version of this diagram (or equivalent if it has been adjusted to something similar).
- b) In Rebasing Phase 2 Enbridge indicated that information in this diagram was incorrect and based on a previous CGA study and that it required updating to be accurate. Please provide the updated information source that Enbridge is currently using for the updated energy and emissions information that is referenced in this diagram.

#### 2.5-PP-31

Reference: In Phase 1, EB-2022-0200, Enbridge Gas presented evidence on its Asset Management Plan (AMP). The then current AMP outlined planned capital expenditures over a 10-year period from 2023 to 2032. Enbridge Gas’s proposed capital spend in 2024 was \$1,470.3 million. On December 21, 2023, the OEB issued its Phase 1 Decision and Order. In its Decision, the OEB found that Enbridge Gas’s 2024 capital budget should be reduced by \$250 million. The resulting utility capital expenditures included in 2024 rates, net of other adjustments, was \$1,141.4 million. [2/5/5, page 1]

For the reduction (or increase) per year in updated ten year Capital plan, please provide the respective annual reduction (or increase) compared to the original 10 year plan filed in Phase 1. Please indicate how much of the change per year is due to each of the three categories Enbridge provided (Reassessment, EDIMP, IRP).

2.5-PP-32

Reference: Enbridge 2025-2034 AMP [EB-2020-0091 EGI\_AMP\_2025-2034\_20241108, Page 17]

EGI was successful in achieving these reductions by reprioritizing its capital portfolio based on value-based decisions and managing risk, while still maintaining safe and reliable operations through:

- Reassessment of project needs to focus on component replacements to address short-term critical needs. This creates risk of increased cost to the customer in the long term as it can be less efficient to perform replacement work at the same location over multiple years compared to a full replacement in one year.
- EDIMP – As a subprogram within the DIMP, EDIMP focuses on a subset of distribution pipelines (based on criticality to operations) and is expected to increase understanding and data collection through improved condition-monitoring techniques. Inspections to capture field data on condition and asset health will be collected, where possible, through ILI technology, nondestructive examination (NDE), high-resolution leak detection, and computational methods in order to recommend alternatives to pipe replacement and to effectively manage risk.
- IRP Program and Pilots – Investments that pass the IRP Screening process resulting in IRPAs are expected to further defer capital spend as the program evolves. For more details on IRP, see **Section 4.6**.

- a) Please explain why Enbridge did not undertake the above noted Capital prioritization before filing its Phase 1 application and only conducted it after the OEB Phase 1 Decision.
- b) What additional processes (if any) has Enbridge put in place to enable Capital reprioritization and reductions (including the tools noted above) for future iterations of its Capital plan, that can be applied to the next rebasing application? Please provide a copy of any new processes, guidelines, etc. developed and implemented.
- c) Please provide Enbridge's materials (including reports, presentations, memos, etc.) supporting the further reductions in the Capital plan expected from IRP, as noted above.

2.5-PP-33

Please provide the project list (Excel) for all projects in the current Enbridge AMP.



2.5-PP-34

Please provide an update on Enbridge's Appeal Motion in respect of the Phase 1 Decision.

2.5-PP-35

- a) Please indicate if Enbridge believes that the OEB approved Capital budget (EB-2022-0200) as a hard cap on Capital spending during this rate term (i.e. does not permit over-spending).
- b) Please explain how any over-spending of Capital during this rate term will be treated by Enbridge.

2.7-PP-36

Reference: AMI technology has become the standard for many natural gas utilities in North America. [2/7/2, page 2]

- a) Please provide the reference documents indicating that AMI technology has become the standard in many natural gas utilities in North America.
- b) Please provide the list of North America natural gas utilities referenced above and indicate what they represent as a percentage of total North American natural gas utilities (including combined gas/electric utilities ,if applicable).
- c) Has Enbridge undertaken any analysis into utility attributes or factors that have led some utilities to use AMI technology as a standard and others not to? If no, why not. If yes, please provide copies of the research, analysis and Enbridge's interpretation of the findings.

2.7-PP-37

Reference: "... there was a delay with the necessary approvals from Measurement Canada for the use of the required POC meters within Canada." [2/7/2, page 5]

Are other natural gas utilities in Canada approved for AMI meter use? If yes, why didn't Enbridge select those approved technology to avoid the Measurement Canada approval delay.

2.7-PP-38

Reference: The cost for the POC is modest and is managed through existing budgets. [2/7/2, page 6]

Please provide the estimated cost for the POC. If the budget is not based on fully allocated costs, please also estimate the additional costs related to using fully allocate costs.

7.0-PP-39

References:

Enbridge Gas proposes to harmonize the EGD and Union rate zones into one rate zone for in-franchise services. The harmonization of rate zones allows Enbridge Gas to align, simplify and enhance rates and services to meet customers' needs. [7/0/1, page 2]

- a) What annual utility savings are estimated to result from having an aligned and simplifies harmonised rate zone once fully implemented? Please provide the breakdown of savings by major cost category.
- b) Did Enbridge develop a financial business case to compare rate zone options and select a preferred option? If no, why not. If yes, please provide a copy of the business case and the materials (presentation, memo, etc.) used to gain management approval.
- c) Was the rate zone options and/or recommended approach presented to the Enbridge Board of Directors for information or approval? If yes, please provide a copy of the materials provided to the Board of Directors.

7.0-PP-40

Are there any residual rate harmonization issues left from the utility merger that have not already been resolved or included in this Phase 3 application? If yes, please provide a list of the residual issues for harmonization and indicate for each when Enbridge intends to propose an approach.

8.2-PP-41

- a) For the existing and proposed Interruptible rate classes in Table 5 - Harmonized Interruptible Bundled Contract Rate Class Mapping Summary [8/2/4, page 21], please provide a table comparing the differences between each.

- b) Enbridge had previously identified difference in the approach and terms used for interruptible rates between legacy Union Gas and Enbridge Gas. Please provide details on how each of those differences were assessed and the basis for deciding on the proposal in this application.

8.2-PP-42

For the existing and proposed Interruptible rate classes in Table 6 - Harmonized Seasonal Firm Bundled Contract Rate Class Mapping Summary [8/2/4, page 24], please provide a table comparing the differences between each.

8.2-PP-43

For the existing and proposed Interruptible rate classes in Table 7 -Harmonized Unbundled Storage Service Rate Class Mapping Summary [8/2/4, page 28], please provide a table comparing the differences between each.

8.2-PP-44

- a) The OEB and stakeholders have identified opportunities to better leverage interruptible rates for IRP purposes. Please provide details on how those considerations were included in Enbridge's analysis, option and recommended approach.
- b) What incremental IRP results does Enbridge expect from Rate E30 above those from existing interruptible rates?

8.2-PP-45

- a) Gazifere is currently under Rate 200 [per EB-2024-0200 Exhibit I.1-CAFES Ottawa-7 Plus Attachments] serving 41,300 ex-franchise customers [EB-2024-0200 Exhibit I.1-STAFF-2]. Please provide the changes that Gazifere will incur by moving to the new Rate E62 (once fully implemented) and what the typical annual financial impact will be from moving to the new rate compared to the existing Rate 200.
- b) Would moving Gazifere to Rate E62 have any impact if the OEB requires Gazifere to cover their share (approximately 28.1%) of the costs for the proposed St. Laurent Replacement Project (estimated at \$216 million)? If yes, please provide details.