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June 5, 2025

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Marconi,

Re: Enbridge Gas Inc.
2024 Rate Application-Phase 3
Ontario Energy Board (OEB) File Number: EB-2024-0064

Please find enclosed the interrogatories of the Canadian Biogas Association in the above noted proceeding.

Yours very truly,

Michael R. Buonaguro
Encl.

EB-2025-0064

Enbridge Gas Rebasing – Phase III

Interrogatories of the Canadian Biogas Association

8.2-CBA-1

REFERENCE: Exhibit 8 Tab 2 Schedule 5 Page 19

PREAMBLE:

Enbridge Gas is proposing to continue to use the site-specific monthly service fee for producers taking service under Rate E82. This rate design is based on approved rate-setting methodology for Rate 401, which calculates a site-specific monthly service fee for each RNG injection service.

a) How many Rate 401 contracts does EGI have, and what are the lowest, highest, and median site-specific monthly service fees under those contracts?

8.2-CBA-2

REFERENCE: Exhibit 8 Tab 2 Schedule 5 Page 23

PREAMBLE:

Other direct costs (lines 3, 4, and 5) are based on operational experience related to producer stations. These other direct costs include the following annual expenses:

• Data entry and travel includes an hour of employee labour time for technicians to complete data entry and to travel to/from the producer station;
• Weed spraying includes an expense of $100 for the weed spraying that is completed annually at each station; and
• Station painting includes an expense of $530, which is the average annual cost of the station painting program.

a) Please explain why the weed spraying costs for producer RTU stations is 80% higher than for producer stations.

<u>8.2-CBA-3</u>

REFERENCE: **Exhibit 8, Tab 2, Schedule 5, Page 28**
Exhibit 8, Tab 2, Schedule 5, Page 9

PREAMBLE:

Enbridge Gas proposes to set the transmission commodity charge equal to 50% of the commoditized Rate E70 Dawn to Parkway easterly demand rate excluding Parkway Station. Applying 50% to the rate is meant to represent the mid-point of the Dawn Parkway System to recognize that producer services are located at various locations along the Dawn Parkway System and gas injected onto the system would not travel the full distance of the system. The proposed rate design also allows for more stable and predictable rates for these customers over time, as the rate design is no longer derived based on in-franchise activity.

The impact of the proposed rate design change for the transmission commodity charge is provided at Table 12. Compared to the 2024 transmission commodity charge of $0.039/GJ, the increase to the proposed charge of $0.041/GJ in 2024 is $0.002/GJ (or 6%).

The derivation of the Rate E70 demand charges based on the proposed cost allocation and rate design is provided at Phase 3 Exhibit 8, Tab 2, Schedule 9, Attachment 12, page 1.

a) Please provide details for the derivation of the commoditized Rate E70 Dawn to Parkway easterly demand rate excluding Parkway station and reconcile those details with the derivation of the Rate E70 demand charges set out at Exhibit 8, Tab 2, Schedule 9, Attachment 12, page 1 (it is not clear to the CBA how the proposed charge of .041/GJ for proposed new rate class E80 flows from the information at Exhibit 8, Tab 2, Schedule 9, Attachment 12, page 1).

<u>8.2-CBA-4</u>

REFERENCE: **Exhibit 8 Tab 2 Schedule 5 Page 29**

PREAMBLE:

Enbridge Gas is proposing a delivery commodity charge as part of the Rate E80 rate design, consistent with Rate M13, to recover UFG and company use fuel from producers. The delivery commodity charge will apply only to producers who choose to transport their production to Dawn.

a) Please provide a calculation or a reference to the calculation of the proposed delivery commodity charge for Rate E80.

8.2-CBA-5

REFERENCE: **Exhibit 8 Tab 2 Schedule 5 Page 29-30**

PREAMBLE:

Enbridge Gas proposes a fixed RNG sampling charge of $12,900 per sample as part of the Rate E80 rate design to recover the incremental cost incurred by the Company to sample and test the quality of gas for producers of RNG.

Currently, RNG producers are required to have their gas production sampled at least annually and during commissioning for quality before injecting into Enbridge Gas's system. The RNG sampling charge is set based on the incremental cost for each occurrence of RNG sampling activity which is forecast at $12,900. The incremental nature of the charge ensures that producers who are required to undertake the RNG sampling activities pay for these costs which ensures the cost is not subsidized by other customers.

a) Please confirm that the proposed fixed RNG sampling charge is intended to only be applied:

   I. once on commissioning, and
   II. once annually.

   If not confirmed, please provide details as to when the sampling charge is intended to apply.

b) Please provide EGI's view on having the RNG sampling fee based on the recovery of the actual cost of sampling for each facility as opposed to a fixed fee.
c) Please provide EGI's view on having RNG producers pay directly to have testing done using qualified 3rd party testing.
d) Please provide a full description of the scope of testing intended to be covered by the proposed fixed fee, i.e. what parts of the production facilities does EGI cover in its proposed annual sampling, what type of testing does it propose on the production systems that require testing, how does the testing protocol change depending on the source of the RNG and the nature of the upgrading technology, etc..

8.4-CBA-6

REFERENCE: Exhibit 8 Tab 4 Schedule 6 Page 11 of 15

PREAMBLE:

A daily balancing service is required for production transported or used for the producer's own purpose (options a) and b) above). All imbalances must be managed daily at Dawn. The account limits and FDVD of the balancing account will be determined based on the needs of the individual producer.

a) Please explain why, physically, a daily balancing service is required for production transported or used for the producer's own purpose, including why it is not required when the producer sells its gas to EGI.