KITCHENER UTILITIES
Kitchener Operations Facility
131 Goodrich Drive
Kitchener ON N2C 2E8
Telephone: 519-783-7953
Fax: 519-741-2633

Khaled Abu-Eseifan, MMSc, P.Eng., CEM
Manager, Gas Supply & Engineering

Email: Khaled.abu-eseifan@kitchener.ca
Website: www.kitchenerutilities.ca

BY RESS FILING

05 June 2025
Ontario Energy Board
Attn: Ms. Nancy Marconi, Registrar
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario, M4P 1E4

Dear Ms. Marconi:

Re: EB-2025-0064 – Enbridge Gas Inc. ("Enbridge Gas"). – 2024 Rebasing Phase 3 – Interrogatories by City of Kitchener ("Kitchener")

Pursuant to the Ontario Energy Board's ("Board's") Procedure order 2 in the above-noted proceeding, please find enclosed the interrogatories to Enbridge Gas, on behalf of Kitchener.

Sincerely,

Khaled Abu-Eseifan

Manager, Gas Supply & Engineering

4.4 – Kitchener – 1:

Exhibit 4, Tab 4, Schedule 2, Page 12 of 13 paragraph 34:

Enbridge Gas proposes that the WARP continue to be used to price common gas costs, including gas in storage, UFG, company use gas, and compressor fuel, as these costs will continue to be consolidated for the amalgamated utility.

Exhibit 4, Tab 4, Schedule 2, Page 13 of 13 paragraph 37:

Enbridge Gas is proposing to implement the WARP on a permanent basis for the purpose of setting gas costs in the calculation of UFG, compressor fuel, own use gas and gas in inventory upon approval of Phase 3.

Questions:

a) Please confirm if calculation of WARP mentioned above will get impacted by outcome of approach from application EB-2025-0065.
b) Please confirm if calculation of WARP would impact future deferral applications.

7.0 – Kitchener – 2:

Exhibit 7, Tab 0, Schedule 0, Page 4 of 8, Paragraph 11, And Exhibit 8, Tab 4, Schedule 4, Page 7 of 20, Paragraph 20:

The Company also sought feedback from customers on rate zone preferences through the customer engagement process.

Questions:

a) Please confirm if Kitchener (rate T3 customer) was contacted for feedback on rate zone preferences and the rate impact.
b) If not, please explain why Kitchener was not contacted for feedback considering the significant revenue requirement collected from a single customer under a rate class?

7.0 - Kitchener – 3:

Exhibit 7, Tab 0, Schedule 1, Attachment 2, Page 15 of 21, Row 54:

a) Please confirm the rate impact for T3 rate class is more than 5% in total revenue change under any option.
b) Please confirm T3 rate class got the maximum impact of at least over 300%in gas cost revenue change under all options.
c) If yes, Considering the high-rate impact, please explain why Enbridge did not engage with Kitchener in discussion on various rate zone options.

7.1 – Kitchener – 4:

Exhibit 7, Tab 1, Schedule 3, Attachment 1, Page 1:

Gas supply administration costs appear to now be recovered from direct purchase customers and treated as other revenue.

a) Please confirm if T3 is a DP customer and is getting allocated gas supply administration cost which includes Load Balancing -Transportation, Transportation Demand, and Transportation Commodity.
b) If yes, please explain the rational for allocating gas supply administration cost which includes Load Balancing -Transportation, Transportation Demand, and Transportation Cand to T3 rate customer.
c) Please confirm, if Kitchener as a T3 DP customer, manages all it gas supply requirement and does its own load balancing using its contract parameters
d) If yes, please explain the rational of cost causation of allocating gas supply administration cost given that T3 rate manages all its load balancing requirements within its contract parameters.

7.2 – Kitchener – 5:

EB-2022-0200 Exhibit 7, Tab 2, Schedule 1, Attachment 11

a) Please confirm if there is a separate section for cost allocation factors description.
b) If not, please confirm cost allocation factors description referred in EB-2022-0200 Exh 7, Tab 2 Sch 1 Attachment 11 is valid in current application EB-2025-0064.

7.3 – Kitchener – 6:

Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 19 of 21

Line 37 - Allocation Factor : NETFROMSTOR: T3 54

a) Please provide current contracted deliverability parameter for T3 rate class.
b) Please confirm if the current contracted deliverability parameter for T3 rate class has been used in cost allocation factor calculation for T3 rate class.
c) If current contracted deliverability has not been used in the cost allocation factor, please provide updated cost allocation based on contracted deliverability parameter and the revenue requirement for T3 rate
d) Please provide calculation/explanation on deliverability injection parameter i.e., what it is used for and what/how cost is allocated in rate calculation.
e) Please provide difference between firm injection deliverability parameter and incremental injection deliverability parameter calculation.
f) Please confirm if T3 rate pays monthly fixed cost towards annual firm injection and firm withdrawal parameters.
g) Currently T3 rate can use annual firm withdrawal parameter during winter months to plan for peak day consumption along with incremental gas purchase. Using similar rational, please

confirm if T3 rate can use annual firm injection parameter incremental to DCQ during summer months to fill storage considering T3 rate itself is a natural gas utility and has to manage storage.

h) Please provide detail information on how T3 rate can use firm deliverability injection parameters and under what situations considering it is named as firm and a fixed monthly cost is charged for annual firm injection/withdrawal parameter.
i) If the firm deliverability injection parameter is considered as balancing transaction, then please explain the rational of allocating fixed monthly cost for firm deliverability injection parameter if it cannot be used.

7.3 – Kitchener – 7:

a) Please confirm what allocation factors would be used in cost allocation in next 5-year annual IR applications and deferral applications until next rebasing application i.e., please confirm whether allocation factors will get updated in any other application until next rebasing application.
b) Please confirm if allocation factors are not updated in this application, it will not be updated until next rebasing application.
c) Please update all allocation factors based on current contract parameters and provide updated revenue requirement and cost allocated to T3 rate.

7.3 – Kitchener – 8:

Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 19 of 21:

Line 47 - Allocation Factor: STORAGEEXCESS: T3 3,206

a) Please provide current contracted storage parameter for T3 rate class.
b) Please confirm if the current contracted storage parameter for T3 rate class has been used in cost allocation factor calculation.

7.3 – Kitchener – 9:

Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

DSM_ADM and DSM_PRO – allocates program related cost to in-franchise customer in proportion to budget cost.

a) Please explain what is meant by budget cost.
b) Please confirm whether the DSM fund was charged to T3 rate at the last rebasing application.
c) Please provide details since when the DSM fund was allocated to T3 rate class.
d) In addition, please provide the DSM annual amount charged to T3 rate (Kitchener) until 2024. Also include the forecasted DSM amount charged to T3 rate until next rebasing application.
e) Please confirm if T3 rate class is eligible for the DSM fund.
f) If T3 rate class is not eligible to access DSM fund, please confirm if Kitchener Utilities customer can access DSM fund for the amount paid by T3 rate class.

g) If not, then please explain why Kitchener utilities customers are not able to access the DSM fund for the amount paid by T3 rate class.

7.3 – Kitchener – 10:

Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

DAWN_DEMAND –

Please explain and provide details, why the allocation factor for DAWN_DEMAND increased compared to phase 1 allocation factor

7.3 – Kitchener – 11:

Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

HIGPRESS<=4 – CD and HDD

a) Please confirm if Kitchener is the only T3 rate class customer. In addition, please confirm if in future any other customer will be assigned T3 rate class or E64 under new rate harmonization.
b) Please confirm whether Enbridge had done calculation in phase 1 application and saw a reduction in revenue requirement calculation using local Kitchener-Waterloo HDD instead of using London HDD.
c) Please confirm historically Kitchener-Waterloo temperature is colder than London temperature.
d) Please confirm the impact on design day demand calculations if a higher temperature is used in regression calculation for the same consumption data
e) Considering Kitchener a standalone gas utility in the T3 rate class, please explain the rational and justification of not using Kitchener-Waterloo HDD for calculating design day demand and justify of allocating higher design day demand and corresponding higher revenue requirement to T3 rate class.

7.3 – Kitchener – 12:
Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

KIRKWALL_DEMAND –

a) Please confirm if T3 rate class uses KIRKWALL transmission capacity.
b) If Not, Please explain why T3 rate class is being allocated KIRKWALL_DEMAND.
c) Please explain, why KIRKWALL_DEMAND allocation factor for T3 rate increased more than 10 times compared to phase 1 allocation factor.

7.3 – Kitchener – 13:
Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

TRANSCOMM

a) Please confirm the description for TRANSCOMM i.e., TRANSCOMM Allocates transmission related UFG costs to ex-franchise rate classes in proportion to ex-franchise volumes
b) If TRANSCOMM is cost incurred for ex-franchise customer, please explain why Kitchener (T3 rate class) has been allocated TRANSCOMM fuel allocation factor.

7.3 – Kitchener – 14:
Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

SALESPROMO –

Please explain and provide details on sales and promotion cost incurred for T3 rate class.

7.3 – Kitchener – 15:
Exhibit 7, Tab 3, Schedule 7, Attachment 12, page 18 of 21:

BAD_DEBT –

a) Please confirm the description for bad debt cost i.e., bad debt is delivery-related in-franchise contract service bad debt expense to contract rate classes in proportion to the average number of in-franchise contract customers
b) Please confirm if Kitchener is the only in-franchise contract customers in the T3 rate class.
c) Please confirm, Kitchener under T3 rate is a municipality owned utility.
d) If yes, please explain and provide details why bad debt is allocated to T3 rate class, considering answers b and c above.

8.1 – Kitchener – 16:

Exhibit 8, Tab 1, Schedule 4, Page 4 of 8, line 11:

Please provide detailed calculation of fixed monthly customer charge for rate E64 (T3).

8.4 – Kitchener – 17:

Exhibit 8, Tab 4, Schedule 4, Page 11 of 20, Paragraph 29

a) Please confirm if Kitchener was engaged in discussion of expansion of semi-unbundled service into ECDA.
b) If not, if Enbridge Gas contracted additional storage and/or transportation capacity and/or enhanced services from third parties, please confirm whether the additional cost incurred from third parties could get allocated to T3 rate class considering it is an existing semi-bundled customer.

8.5 – Kitchener – 18:

Exhibit 8, Tab 4, Schedule 4, Page 12 of 20, Paragraph 31

Please confirm if Kitchener was engaged in discussion on delivering their DCQ to Kirkwall.