



June 5, 2025

**VIA RESS**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Acting Registrar

Dear Mr. Murray,

**Re: Enbridge Gas Inc. ("EGI")  
2024 Rebasing – Phase 3  
Board File No.: EB-2025-0064**

We are counsel to the Ontario Home Builders' Association ("**OHBA**") in the above-noted proceeding. Please find attached the interrogatories of OHBA to EGI pursuant to Procedural Order No. 2.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer", with a stylized flourish at the end.

DT Vollmer

c. Scott Andison, OHBA

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998,  
S.O. 1998, c.15 (Schedule. B);

**AND IN THE MATTER OF** an Application by Enbridge Gas  
Inc. (“**EGI**”), pursuant to section 36(1) of the Ontario Energy  
Board Act, 1998, for an order or orders approving or fixing  
just and reasonable rates and other charges for the sale,  
distribution, transmission and storage of gas as of January  
1, 2024.

**EB-2025-0064**

**INTERROGATORIES**

**OF**

**Ontario Home Builders’ Association**

**(“OHBA”)**

**June 5, 2025**

**Question:**        **1.3-OHBA-1.**

**Reference:**        • Exhibit 1, Tab 3, pp. 5-7

**Preamble:**        EGI states that its rate harmonization proposal will improve consistency in customer experience and eliminate the artificial boundaries that have existed between customers served by legacy utilities and rate zones.

- a)        Please discuss how rate harmonization is expected to affect customer connection timelines, cost estimates, and rate class assignment for new residential subdivisions.
- b)        Please discuss any analysis undertaken by EGI on the impact of harmonized rate zones on cost estimates or contributions in aid of construction for builder-serviced areas?
- c)        Please describe any transitional measures for builders or residential development stakeholders during the harmonization implementation phase.

**Question: 1.3-OHBA-2.**

Reference:

- Exhibit 1, Tab 3, Schedule 1, pp. 5
- Exhibit 1, Tab 3, Schedule 1, Attachment 2, p. 1
- Exhibit 1, Tab 16, Schedule 1, pp. 1–3

Preamble: EGI was directed to update its marketing and reference materials aimed at potential customers, HVAC contractors, and builders and has committed to update customer-facing materials.

- a) Please provide the any updated materials not filed in the evidence that is specifically intended for builders, residential development stakeholders, and HVAC contractors and explain how all materials updated as part of the applicant were revised to reflect existing and anticipated market and policy conditions.
- b) Do the revised materials include side-by-side energy cost or emissions comparisons? If so, please provide the methodology used and confirm whether there have been any updates to reflect the recent changes in federal carbon pricing.
- c) Please indicate the process and timeline EGI will use to identify and remove or revise outdated materials on third-party websites or through field representatives.
- d) What internal controls or compliance measures has EGI put in place to ensure ongoing alignment with OEB guidance related to marketing to builders and HVAC contractors?

**Question:**        **1.16-OHBA-3.**

**Reference:**        • Exhibit 1, Tab 16, Schedule 1, pp. 1–3

**Preamble:**        EGI indicated that it engaged with a wide range of customer and stakeholder groups were invited to attend one or more engagement sessions, including representatives of commercial and industrial customers, municipal utilities, government agencies, and ratepayer advocates.

- a)        Did EGI engage with builder associations, residential development stakeholders, and/or HVAC contractors in preparing the proposed rate harmonization? If yes, please summarize feedback received from these stakeholders and how it was integrated into the application and proposal. If no, please explain how the interests of these stakeholders were considered in developing the rate harmonization proposal.

**Question:**        **4.2-OHBA-4.**

**Reference:**        • Exhibit 4, Tab 2, Schedule 2, pp. 2–11

**Preamble:**        EGI proposes to implement the Weighted Average Reference Price (“**WARP**”) on a permanent basis to calculate utility gas costs and to derive gas supply commodity charges for customers under sales service. EGI indicates that this will eliminate forecast recovery variances and improve price transparency.

- a)        Has EGI evaluated whether adoption of WARP will impact the predictability or comparability of customer bills for new connections in housing developments compared to current zone-specific reference prices? If yes, please provide such analysis.
- b)        Please explain whether customers transitioning to service (e.g., from vacant to occupied dwellings) during seasonal shifts in the QRAM cycle would face greater volatility in commodity charges under WARP.
- c)        Did EGI conduct any outreach or scenario testing to assess how WARP will affect builders or other residential development stakeholders managing service installs across former rate zones?
- d)        Please discuss how the proposed WARP will impact commodity pricing during interim or construction phases, particularly for accounts with variable seasonal loads (e.g., winter heating starts)?
- e)        Will WARP result in any material change to construction heating charges for small general service customers in former Union or EGD zones?
- f)        Please confirm whether customers can access any deferrals or phase-ins for WARP-derived charges during the initial harmonization period.
- g)        Please discuss any analysis to determine if WARP will increase costs for interim gas usage (e.g., construction heat or first occupancy heating)?

**Question:**        **4.2-OHBA-5.**

Reference:                • Exhibit 4, Tab 2, Schedule 2, pp. 4–5, 13

Preamble:              Enbridge notes that the WARP will replace prior reference prices like the Dawn, Alberta Border, and PGVA reference prices, and states this is aligned with moving to a single rate zone.

- a)        Please confirm whether the proposed change would affect any deposit, contribution-in-aid, or other cost estimate assumptions used for builder-serviced subdivisions.
- b)        Please discuss whether the WARP methodology will influence any assumptions or defaults used in gas vs. electric heating comparisons in builder marketing material (e.g., if embedded in cost calculators)?

**Question:**        **7.0-OHBA-6.**

Reference:            

- Exhibit 7, Tab 0, Schedule 0, page 8
- Exhibit 8, Tab 2, Schedule 6

Preamble:           EGI proposes a rate mitigation plan to manage bill impacts for customers transitioning to harmonized rate classes. It notes that rate changes are to be phased in with consideration for customer impact.

- a)        Please provide any analysis and discuss bill impact scenarios for new housing developments under both current and proposed harmonized rates across the current rate zones.
- b)        For residential customers (new construction) with expected typical usage profiles, please provide and discuss the potential variances to the anticipated annual bill impacts under harmonized rates.
- c)        Did EGI consider any targeted mitigation options for customer classes, including new residential subdivisions or areas under active development? If so, please describe. If no, please discuss why not.



**Question:**        **7.0-OHBA-7.**

Reference:            • Exhibit 7, Tab 0, Schedule 1, pages 1–4 and page 15  
                             • Exhibit 8, Tab 2, Schedule 1

Preamble:           EGI outlines multiple rate zone alternatives and states that in reviewing the options, EGI considered principles such as cost causality, simplicity, rate stability, and customer understanding. EGI notes that the preferred approach is a single rate zone with harmonized rate classes.

- a)            Has EGI modeled how harmonizing all costs under a single rate zone could impact customer classes in residential high-growth or infill areas? If yes, please provide and discuss such analysis.
- b)            Please confirm whether builder or residential development stakeholders were consulted in the evaluation of rate zone alternatives? If so, please describe the consultation process and outcomes. If no, please explain why not.

**Question: 8.1-OHBA-8.**

Reference: 

- Exhibit 8, Tab 1, Schedule 1, pp. 5–6;
- Exhibit 8, Tab 1, Schedule 1, Attachments 1 & 2

Preamble: EGI proposes to recover 100% of delivery costs for in-franchise general service customers through fixed monthly charges which is an increase from the current fixed recovery rate of 55%. EGI states that the amount of fixed cost recovery has increased as a result of EGI's proposal to implement straight fixed variable rate design with the harmonized rate classes.

- a) Please discuss whether EGI believes 100% fixed cost recovery is appropriate for general service customers, particularly those in the residential and small commercial sectors.
- b) Did EGI undertake any analysis to assess the impact of this shift on low-volume users or energy-conscious consumers, such as those in new homes built to higher energy efficiency standards? If yes, please describe the analysis. If not, please discuss potential impacts and how they are addressed in the application.
- c) Did EGI consider hybrid models (e.g., partially fixed, partially volumetric) that might provide better incentives for conservation or more equitable billing outcomes? If yes, please provide details or indicate where in the evidence such analysis is provided.

**Question:**        **8.2-OHBA-9.**

**Reference:**        • Exhibit 8, Tab 2, Schedule 1, pp. 5–17

**Preamble:**        EGI proposes to implement the proposed harmonized rates and services in 2027 through a phased approach, as set out in its Rate Harmonization Implementation Plan (“**RHIP**”).

- a) Please describe how EGI intends to communicate rate changes and customer impacts to builders, residential development stakeholders, and new residential customers ahead of implementation.
- b) What customer engagement activities were conducted with builders and residential development stakeholders in developing the RHIP and how has it been incorporated into the RHIP?
- c) Will EGI provide bill comparison tools or transitional support to housing sector stakeholders to reduce customer confusion and support cost transparency in new home sales as part of implementing the RHIP?

**Question: 8.2-OHBA-10.**

Reference:

- Exhibit 8, Tab 2, Schedule 3
- Exhibit 1, Tab 3, Schedule 1, pp. 2–3
- Exhibit 1, Tab 3, Schedule 1, Attachment 1, p. 1

Preamble: EGI seeks approval to implement harmonized rate classes based on one rate zone, a Straight Fixed Variable with Demand (“**SFVD**”) rate design, and a five-year mitigation plan (Rate Mitigation Rider R).

- a) Please confirm whether any analysis was conducted to evaluate the impact of SFVD design on residential developers' operating costs during construction and pre-service phases. If yes, please discuss. If no, please explain why not.
- b) Were builder/developer-specific consumption profiles used in assessing the SFVD design impacts? If so, please provide the data and analysis.
- c) Has EGI considered whether implementation of SFVD benefits or disincentivizes energy-efficient building design? If yes, please discuss how the benefits or disincentives were considered. If no, please discuss whether EGI believes SFVD will have any benefits or disincentives for supporting energy-efficient building design and construction.

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS  
5<sup>th</sup> day of June, 2025

A handwritten signature in black ink, appearing to read 'Lisa DeMarco', with a long, sweeping horizontal stroke extending to the right.

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Lisa (Elisabeth) DeMarco  
Resilient LLP  
Counsel for OHBA