



June 5, 2025

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th 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 Three Fires Group Inc. ("**TFG**") and Minogi Corp. ("**MC**") in the above-noted proceeding. Please find attached the joint interrogatories of TFG and MC to EGI pursuant to Procedural Order No. 2.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

c. Reggie George, TFG
Dr. Don Richardson, MC

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

THREE FIRES GROUP INC.

(“TFG”)

AND

MINOGI CORP.

(“MC”)

June 5, 2025

Question: 1.3-TFG/MC-1.

Reference:

- Exhibit 1, Tab 3, Schedule 1, pp. 2–7
- Exhibit 7, Tab 0, Schedule 1

Preamble: EGI provides average bill impacts for residential customers by zone and rate class, including with respect to the proposed rate mitigation.

EGI notes that the total annual bill impacts for a typical residential sales service customer in the first year of implementation in 2027 result in:

- an increase of \$16.46 (or 1.3% of total bill) for a Rate 1 customer in the EGD rate zone;
- a decrease of \$35.51 (or 2.9% of total bill) for a Rate 01 customer in the Union North West rate zone;
- a decrease of \$199.73 (or 14.2% of total bill) for a Rate 01 customer in the Union North East rate zone; and
- an increase of \$22.84 (or 2.0% of total bill) for a Rate M1 customer in the Union South rate zone.

- a) Has EGI analyzed how these bill impacts and mitigation proposals will affect First Nations or Indigenous residential customers? If yes, please summarize the findings, including any disaggregated data specific to First Nations and Indigenous customers. If not, please explain why this analysis has not been undertaken.
- b) Please confirm whether EGI engaged with First Nations, Indigenous customers, or Indigenous organizations in developing the mitigation proposal.
- c) Please list the First Nations communities currently served in each of the existing EGD and Union rate zones.
- d) For each listed community, provide the estimated residential bill impact (in dollars and percentage), both before and after application of Rider R.
- e) If this information is not currently available, please explain whether EGI will compile and publish such data in advance of proposed rate harmonization implementation.
- f) Please confirm the expected rate implications for customers within (i) Mississaugas of Scugog Island First Nation (“**MSIFN**”) and (ii) Chippewas of Kettle and Stony Point First Nation (“**CKSPFN**”), should EGI’s proposals be accepted, as well as the available calculations and assumptions behind those numbers.
- g) Excluding immaterial considerations, please identify any characteristics of (i) MSIFN’s community, and (ii) CKSPFN’s community, that will likely result in bill impacts that are different from EGI’s estimates for the applicable rate zone more broadly.

- h) Excluding immaterial considerations, please identify any characteristics of (i) MSIFN's community, and (ii) CKSPFN's community, that could potentially result in bill impacts that are different from EGI's estimates for the applicable rate zone more broadly.

Question: 1.3-TFG/MC-2.

Reference:

- Exhibit 1, Tab 3, Schedule 1, Attachment 3, p.3
- Exhibit 8, Tab 2, Schedule 6, p.2

Preamble: EGI proposes to implement a Rate Mitigation Rider (Rider R) to phase in bill impacts associated with rate harmonization beginning in 2027.

- a) Please discuss whether EGI conducted disaggregated bill impact analysis for on-reserve First Nations customers or for self-identified Indigenous customers?
- b) If yes to a), please summarize the findings and identify which communities or groups are expected to experience increases or decreases in their bills.
- c) If no to b), please explain why not and whether EGI will commit to conducting such analysis and sharing it with the Indigenous Working Group (“IWG”) prior to rate harmonization implementation.
- d) Please confirm the categories of customers in the Union South and EGD rate zones that would benefit from Rider R
- e) Please confirm whether any customers in MSIFN and CKSFN would benefit from Rider R. If there are such customers, please provide details regarding the types of customers and extent to which they will benefit

Question: 1.6-TFG/MC-3.

Reference:

- Exhibit 1, Tab 6, Schedule 1, pp. 2–5

Preamble: EGI describes its customer engagement activities in support of its Phase 3 proposals.

- a) Please provide details of all targeted engagement conducted with First Nations, First Nations governments or Indigenous customers concerning the proposed rate harmonization. If no such targeted engagement was conducted, please explain why not and whether EGI intends to conduct targeted engagement with First Nations before rate harmonization implementation.

Question: 1.13-TFG/MC-4.

Reference: • Exhibit 1, Tab 13, Schedule 5, pp. 1–4, 23-26, 77-88

Preamble: EGI is required to report on its implementation of Integrated Resource Planning (“**IRP**”). EGI indicated that it reviewed ways to increase uptake of interruptible services as part of its IRP mandate.

EGI notes that it engages with stakeholders within existing stakeholder engagement channels on an ongoing basis. This includes outreach opportunities to reach wider audiences such as through municipal conferences and targeted discussions with stakeholders, such as those that can inform the demand forecast process in regions with system constraints, which represent an opportunity to introduce IRP and discuss relevant elements.

- a) Has EGI evaluated any IRP alternatives that include or are tailored to First Nations communities? If yes, please summarize the nature of those alternatives and the communities involved. If not, please explain why and whether Enbridge will commit to collaborating with Indigenous communities in future IRP planning or pilots.
- b) Were any Indigenous-owned or operated facilities considered in this review? If yes, please provide details of any analysis conducted, results, or stakeholder feedback. If no, please explain why and whether these facilities will be included in future IRP evaluations.
- c) Has EGI undertaken any outreach or education initiatives directed at First Nations to promote awareness of IRP tools? If yes, please provide details.
- d) Does EGI intend to co-develop IRP pilots or community-led proposals with First Nations, including through the IWG?
- e) Does EGI’s IRP methodology incorporate equity screening or reconciliation criteria that could identify First Nations communities as priority areas? If not, would EGI consider or support such criteria as part of its IRP framework?

Question: 1.13-TFG/MC-5.

Reference:

- Exhibit 1, Tab 13, Schedule 5, p.7
- Exhibit 1, Tab 13, Schedule 5, Attachment 1, pp. 14-17

Preamble: The Board indicated that the annual IRP Report should include a summary of IRP engagement or consultation activities with Indigenous peoples. EGI notes that through the IWG it has engaged on a range of topics including energy transition. And that it has proposed to provide IRP updates to the IWG.

- a) Please summarize all IRP engagement with the IWG to date, including reference to any relevant sections of any filed IWG Report.
- b) Please discuss the issues, concerns, and suggestions put forward regarding IRP projects and piloting by the Indigenous participants in the IWG and EGI's responses to same.
- c) Please discuss how EGI has or intends to incorporate the views and suggestions provided by the Indigenous participants in the IWG into its IRP proposals and pilots.

Question: **8.1-TFG/MC-6.**

Reference: • Exhibit 8, Tab 1, Schedule 2, pp. 1–3

Preamble: Enbridge is exploring rate exit mechanisms to manage stranded asset risks.

- a) Please discuss the potential impacts of rate exit mechanisms to manage stranded assets risks for First Nations and Indigenous customers.
- b) Will EGI assess the potential impact of any proposed exit fee approach on First Nations and its Indigenous customers, including remote, near-remote, and under-served areas? If EGI intends to conduct such analysis, please discuss the intended analysis, including how EGI will ensure meaningful engagement with First Nations and Indigenous customers, including with the IWG.

Question: 8.2-TFG/MC-7.

Reference:

- Exhibit 8, Tab 2, Schedule 1, Attachment 1, pp. 1–3
- Exhibit 8, Tab 2, Schedule 4, pp. 1–3
- Exhibit 8, Tab 4, Schedule 7, Attachment 1, pp. 2–7

Preamble: EGI reviewed interruptible rate design as directed by the OEB to increase customer uptake. In addition, the proposed harmonized rate class mapping may result in changes to the classification of First Nations community facilities. EGI is also proposing changes to interruptible rate designs, including removing negotiated curtailment credits and applying new overrun charges.

- a) Has Enbridge identified whether any First Nations community facilities currently take service under an interruptible rate class? If yes, please indicate the types of facilities and the rate class changes anticipated. If no such facilities have been identified, please confirm whether EGI has mapped Indigenous community facilities to existing rate classes as part of its rate harmonization exercise.
- b) Did EGI consider whether First Nations community facilities (e.g., band offices, schools, community centres) could benefit from revised interruptible rate options? If yes, please describe any assessments, consultations, or barriers identified. If no, please explain why First Nations facilities were excluded from the evaluation, and whether EGI intends to revisit this in future studies.
- c) Has EGI identified how many First Nations community facilities (e.g., schools, band offices, community centres, etc.) will be reclassified as a result of the proposed rate class mapping?
- d) What are the projected bill impacts, both before and after mitigation, for a typical First Nations community facility currently classified under Rate 01 or M1?
- e) Has EGI engaged with First Nations governments to discuss these changes? If yes, please summarize the engagement. If not, please explain why not.

Question: **8.2-TFG/MC-8.**

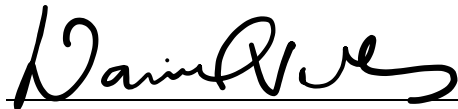
Reference: • Exhibit 8, Tab 2, Schedule 1, pp. 5–17

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**").

EGI notes that it expects to file a more detailed implementation plan as part of its 2027 Rates Application, prior to the implementation of any approved harmonization changes.

- a) Please explain how EGI has incorporated affordability considerations in its proposed rate design and harmonization framework.
- b) Has EGI examined whether the proposed changes result in disproportionate rate increases or decreases for low-income or Indigenous customers? If yes, please provide any disaggregated analysis or equity screening tools used to examine impacts on Indigenous customers and discuss how the RHIP addresses any disproportionate impacts on First Nations and Indigenous customers. If no analysis was conducted, please explain how EGI is satisfied itself that any affordability concerns are addressed in the RHIP.
- c) Does EGI intend to track and report on the bill impacts and service changes experienced by Indigenous customers and communities post-implementation? If yes, please describe the metrics and reporting mechanisms. If not, will EGI consider including Indigenous-specific metrics in its 2027 implementation plan?
- d) Please describe how feedback from First Nations and Indigenous customers will be collected and used to evaluate the impact of harmonization over the mitigation period.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
5th day of June, 2025

A handwritten signature in black ink, appearing to read "D. Vollmer", written over a horizontal line.

DT Vollmer
Resilient LLP
Counsel for TFG and MC