1.6-FRPO-1-3

REF: Phase 3, Exhibit 1, Tab 6, Sch. 1, p. 6, Table 3

Preamble: We would like to understand the impetus to consider the removal of the 40-day restriction on interruption and the decrease in interruptible rates.

1) For each distinct rate zone, please provide the number of days of interruption for each winter in the last 12 years including 2024-25.
   a) Please provide EGI's reasoning for the need for this potential change.

2) Has EGI studied the potential opportunity of the avoided cost of facilities being used to reduce rates versus increasing firm rates?

3) How many customers were asked to complete the survey for the results shown in Table 3?
   a) How many customers completed the survey?

1.6-FRPO-4-7

REF: Phase 3, Exhibit 1, Tab 6, Sch. 1, p. 7-8, Table 4 & Attachment 2, p,59-82

Preamble: We would like to understand the propositions being considered by customers in Lines 1, 2, 8 & 9 and the information provided to those surveyed to consider their answer.

4) Please confirm that Line 1 was referring to the elimination of Rate 25.
   a) If not, to what is the question referring?
   b) How many customers were asked to complete the survey?
      i) Of the 20 customers, who had an opinion on this service, how many had accessed the service in the past?
      ii) How many of those 20 customers were from the Union North Rate zone?

5) For customers asked about Receipt Point rationalization (results in Line 2), what percentage of those customers delivered at a location other than Dawn in the last 5 years?
   a) What were these customers told about the benefits available from this rationalization?
   b) For the results shown in the table on p. 66 of Attachment 2, please provide Innovative Research's assessment of EGI's ability to rely on the answers to inform customer sentiment on a significant gas supply decision.

c) Whether the customers were informed or not, please provide EGI's estimation of the reduction in administrative costs associated with rationalizing the delivery points through elimination of Empress and Enbridge EDA.
   i) Please provide EGI's estimation of the value of Empress and Enbridge EDA deliveries from TCPL in their contribution to lowering seasonal and peak load balancing costs at point of delivery.
      (1) Please provide the rationale for estimating these benefits ensuring all assumptions are included.
d) Without the Empress deliveries, what is EGI's plan for the capacity that once served as the Empress receipt point?
   i) Please confirm that if the capacity is turned back to TCPL, EGI will need to meet Design Day requirements with some other assets or contracting.

6) For the considerations summarized in Lines 8 and 9 regarding Customer Balancing Service (CBS) and potential harmonization with LLB and DVA, please provide any information that was provided to customers surveyed other than what is included in pages 78-82 of Attachment 2.
   a) How did EGI and Innovative Research expect customers to answer without understanding the cost consequences of the changes?

7) In paragraph 11, EGI describes another round of meetings with relevant customer associations. Please provide a list of changes made to EGI's proposals:
   a) From the initiation of the customer survey to the review of the survey results
   b) From a review of the results to the end of the customer engagements
   c) From the end of the customer engagements to the filing of the application

2.5-FRPO-8-14

REF: Phase 3, Ex. 2, Tab 5, Schedule 5 & EB-2022-0200, Ex.O, p. 56

EGI evidence in this proceeding states*: In response to the Phase 1 Decision, Enbridge Gas adjusted its approach to capital spending to increase asset life extension through inspection and repair and prioritize its capital spending to implement the reduction. In addition, several investments were deferred to future years after a review of whether asset life extension activities would be sufficient to support the system in the near term.*

The Phase 1 Settlement states: *Enbridge Gas will provide annual reporting on actual DIMP/EDIMP spending, setting out the work done (and associated costs), listing the projects/facilities where work was done, describing what facilities work was deferred or avoided or otherwise impacted as a result and discussing the cost/benefit analysis of the DIMP/EDIMP work done during the past year.*

Preamble: We would like to understand more about the implementation of EDIMP including EGI's early learnings.

8) Please provide all internal memos, communications and presentations related to the implementation of EDIMP.
   a) Please summarize the early learnings that have evolved the resulting program.
   b) Please provide a list of capital projects of greater than $5M deferred through implementation of EDIMP.
      i) Please include the original capital forecasted, outline what activities the company undertook to mitigate any risk associated with the project and the resulting forecasted deferral.

9) Please provide the reference(s) to the Canada Energy Regulator technical regulations referred to in paragraph 9 of page 2.
   a) Please provide as a hyperlink if available.

10) Figure 2 provides the Variance in Distribution Pipe. Please explain the variance in the Reactive Service Replacement Program.

11) Figure 6 provides the Variance in Utilization. How does this Meter Exchange Compliance Program differ from the on-going regulations of Measurement Canada for custody transfer meters?

12) Paragraph 24 refers a continuous reassessment of project needs. Please provide the quantified output of Copperleaf or any other quantification done by EGI to re-prioritize its capital portfolio.
    a) Please explain any qualitative factors that contributed to the decision to re-prioritize differently than the quantitative analysis recommended.

13) Figure 7 provides the Post-Optimization Spend Profile by Capital Program. Please provide examples of Programmatic - Maintain projects that qualify for capitalization of projects designed to "maintain".

14) Attachment 1 provides the 2024 Utility Capital Expenditures by Asset Class. If we are reading the notes properly, the variance of $107M includes the $23 million associated with Dawn-Corunna. Please provide the top 5 projects or categories that contributed to the remaining $84M variance.
    a) For each of the identified projects, please provide any mitigation activities performed by EGI to allow deferral.

2.7-FRPO-15-16

REF: Phase 3, Ex. 2, Tab 7, Schedule 2

Preamble: We would like to understand more about the efficacy of the AMI being studied in this work being reported.

15) Please define the term high-resolution in the context of accuracy.
    a) What diagnostic information will the system provide?
    b) What types of issues can be identified?
    c) For each issue specified, please provide the number of occurrences of these issues in each of the last five years.

16) Please provide the cost-benefit or discounted cash flow analysis for AMI from North American natural gas utilities that are not integrated with an electric utility.

4.2-FRPO-17-27

REF: Phase 3, Ex. 4, Tab 2, Schedule 2

17) Please confirm that the Gas Supply plans for EGD and Union rate zones can be consolidated absent one reference price being established for gas supply commodity charges for customers.

18) Table 1 shows the Reference Prices – Interim and Current OEB-Approved from the July 2024 QRAM. Please show the components and the pricing that reconciles $2.639 to the PGVA shown in Note 2 (ie., show the determination of components contributing to the respective prices in lines 1 to 5).

Preamble: EGI evidence states: *The WARP does not include the gas supply transportation[11] and load balancing[12] costs that are incurred on behalf of both sales service and direct purchase (DP) customers* WITH FOOTNOTE 12 *The load balancing costs also include planned purchases at Dawn for load balancing requirements and the cost of peaking services.*

19) Please confirm that EGI does not have specified levels of storage for system gas similar to two-point balancing for DP customers.

20) Please describe how EGI determines the balancing needs for customers who must meet minimum storage inventory levels at the February balancing point.

a) Please confirm that not all DP customers need to bring in incremental gas above their DCQ in the winter to meet their minimum February balancing point.

Preamble: EGI evidence states: *Enbridge Gas manages planned load balancing requirements for system and bundled DP customers through a combination of withdrawals from and injections into storage, and purchases of gas supply at Dawn. The load balancing volumes are the planned purchases at Dawn that are above* ***or below average day demand through the year****. (****emphasis added).***

21) What does EGI mean when it states, “or below average day demand through the year”?

22)Please provide a description of the current methodology used to calculate the load balancing costs for customers in Union North.
   a) Please ensure that the description accounts for all of the components (i.e., storage, firm transportation, storage transportation service (STS) and commodity purchases.
   b) Using the July 2024 QRAM, please provide a working spreadsheet that shows the calculation of these costs into a rate/unit cost that is charged to customers:
      i) Please separate bundled and unbundled customers if the determinations are different.

Preamble: EGI evidence states: *The Dawn reference price has historically been lower than the forecast upstream gas supply costs (including both commodity and transportation) that are required to serve sales service customers. As such, the gas supply commodity charges based on the Dawn reference price do not fully recover all gas supply costs on a forecast basis. Variances between the Dawn reference price and the forecast gas supply costs are captured in the PGVA and are recovered as gas cost adjustment rate riders (Rider C) in QRAM. These rate riders are not included in the determination of bill impacts outside of the QRAM process, which results in less transparency of the total bill impact to customers in these rate zones.*

23) Please describe the impact that actual transportation demand charges from a diverse portfolio versus market rates has on this under-recovery.
   a) Could EGI calculate the Dawn reference price by using actual landed costs of contracted service (commodity and transportation to the franchise delivery point) to create an "Ontario Landed Reference" price.
      i) If so, explain the limitations of such an approach.
      ii) If not, please provide a detailed description of what factors inhibit the effectiveness of such an approach.

24) Please describe how transparency would be improved by using the proposed WARP.
   a) Please ensure a description of how the actual demand charges of contracted transport will be dealt with in this proposal (i.e., inside of the WARP calculation, as a QRAM rate rider, or other).

Preamble: EGI evidence states: *Although the WARP is similar to the PGVA reference price used in the EGD rate zone, there is one notable difference. The WARP includes costs incurred to provide a gas supply option to sales service customers only, compared to the PGVA reference price that also includes transportation and load balancing costs. By including the costs to provide sales service only, the WARP acts as a better price signal for sales service customers because it only includes costs that are attributable to the purchase of gas supply. It also allows the gas supply commodity charge to be set based on the WARP, without any additional cost allocation or rate design required.*

25) Please confirm that while the EGD reference price accounts for other gas supply components (i.e., transportation and load balancing) than commodity, the variances associated with the other components are streamed to the appropriate rate classes consistent with the underlying nature of the variance.
    a) If not confirmed, please provide an explanation of the current treatment.

Preamble: EGI evidence states: *As shown in Table 1, the WARP is less than the PGVA reference price used in the EGD rate zone, as the PGVA reference price includes transportation and load balancing costs to move gas to the Enbridge CDA and Enbridge EDA, compared to the WARP that only includes gas supply commodity and transportation contracts for gas supply sourced upstream of Dawn or Empress to provide diversity of supply.*

26) Please confirm that the transportation cost from Empress to Dawn is included in:
    a) The current determination of the EGD PGVA.
    b) The proposed calculation of the WARP.

27) In Attachment 3, page 2, please confirm that the forecasted prices for load balancing calculations use the July 2024 QRAM forecast for:
    a) January-June 2025
    b) July-December 2024

7.0-FRPO-28-36

REF: Phase 3, Ex. 7, Tab 0, Schedule 1

Preamble: EGI evidence states*: Enbridge Gas used a multi-step approach to assess the rate zone alternatives for the amalgamated utility. The Company first established rate design considerations and defined service areas to group similar geographic regions in the Enbridge Gas franchise area. The Company also reviewed the availability of cost information to determine what rate zone harmonization is feasible. Enbridge Gas* ***weighed the benefits and challenges of each alternative and assessed the resulting impacts to customers***. *(emphasis added)*

28) Please provide a summary of the supporting analysis of the benefits and challenges (if not included in a summarized fashion later evidence).

29) In paragraph 14, Enbridge describes the allocation process for Union South and North. Please provide a list of assets/contract rights used for storage (i.e., seasonal and peak load balancing) for each of
a) Union South
b) Union Northeast
c) Union Northwest
for the purposes of cost allocation and ratemaking.
For each existing rate zone, please show the allocation of those assets/contracts to the specific rate zone. Please ensure all applicable transportation contracts are included (e.g., STS, etc).

Preamble: EGI evidence states*: The Central service area is primarily served by gas supply delivered at Dawn but can be served from Western Canada. For gas supply at Dawn, the Central service area can use utility owned transmission assets to serve some customers directly, while other customers require third-party transportation assets for service from Dawn[10]. The Central service area also includes the Niagara region, which is served using third-party contracts from Niagara or Chippawa[11]. The Central service area is part of the current EGD rate zone, which includes the Enbridge CDA*.

30) Please provide the proportion of Niagara served by these contracts?
a) Do these contracts include TCPL FT contracts?
   i) Is some of the service provided by displacement with TCPL described in Mainline settlement agreement?
b) Are these third-party contracts assigned to EGI by another party?

i) For this last category, what is the term of the contract(s) entered?

31) For Table 2 on page 11, please explain how 80% of the East Service Area can be served from Western Canada when EGD Rate Zone and Union North East Rate Zones are fed 15% and 5% respectively from Western Canada.
a) Please provide the underlying contracts that are being referenced in these percentages.

Preamble: EGI evidence states in paragraph 49*: While the Company acknowledges that cost causation may be improved by identifying the specific costs to serve a geographical area and designing rates to recover such costs, the Company also recognizes the additional benefits of one rate zone including a consistent customer experience and reduced administration.*

32) Please provide an estimate of the annual incremental cost of producing customer information for the current rate zones vs. the proposed one rate zone.
a) Please provide the estimate in components and all assumptions listed.

33) Table 5 provides the In-franchise Revenue Impacts by Rate Zone. Please provide the main drivers contributing to:
a) The increases for Union South for all scenarios.
b) The decreases for Union North for all scenarios.
c) Please confirm that the Delivery Revenue section contains gas costs that contribute to delivery rates but not the commodity cost.
i) If not confirmed, please explain what is included more specifically.

34) Table 6 provides the Summary of Proposed 2024 Revenue Change for Current Rate Zones. The note below the table provides an explanation for the difference between current and proposed revenue sufficiency described at Phase 3, Exhibit 7, Tab 1, Schedule 1 as cost allocation differences between in-franchise and ex-franchise.
a) Please explain the referenced cost allocation differences between in- & ex-franchise.
b) Please confirm or clarify if the sufficiency description is found in Table 1 on page 9 of the evidence referenced in Tab 1, Schedule 1.
i) Is the source of the sufficiency purely change in market prices of commodity included in rates or some other driver?

Preamble: EGI evidence states in paragraph 49*: Enbridge Gas is proposing to maintain the combined Panhandle System and St. Clair System cost allocation methodology, with a minor change to simplify the Cost Allocation Study by reducing the number of direct assignments to ex-franchise rate classes.*

35) Please provide a more amplified explanation of the minor change in reducing the number of direct assignments.

36) On page 14 of Attachment 2, please describe the driver(s) that result in a 4010% increase for Rate 100 NW and NE.

7.1-FRPO-37-62

REF: Phase 3, Ex. 7, Tab 1, Schedule 2

Preamble: We would like to understand better how EGI is proposing to allocate transmission assets.

37) How are the costs for transmission assets recovered?
   a) As part of distribution rates or other?
   b) How are transmission costs associated with ex-franchise for connections, such as Dawn-Parkway, Albion, Panhandle, St. Clair, etc.?
      i) In an Excel spreadsheet accompanied by a description, please show how Dawn-Parkway related costs are allocated to in- & ex-franchise customers by current rate class.
      ii) How are Dawn Parkway costs functionalized to EGD and UGL North Rate Zone customers?
      iii) How are Albion costs allocated to rate 332 (e.g., only Albion pipeline asset costs or in combination with Dawn Parkway)?
         (1) What is the forecasted utilization of the Albion line in 2024?
         (2) What was the highest actual flow through the Albion pipe net of TCPL contracted demand flows?

Preamble: EGI evidence states in paragraph 8: *The gas supply function includes gas supply commodity, third-party transportation, load balancing and peaking supply costs. The gas supply function also includes administration costs for sales, direct purchase (DP) and Distributor Consolidated Billing (DCB) services.*

38) How are DCB services segregated between O&M billing and ABC billing?
   a) Are ABC billing revenues deducted from forecasted DCB costs?

Preamble: EGI evidence states in paragraph 10*: Within the plant investment accounts, Enbridge Gas records Dawn facility assets as storage, regardless of the use of the asset. However, the Cost Allocation Study recognizes that certain assets of the Dawn facility have been installed for transmission purposes. Accordingly, costs of the Dawn facility are categorized as a) storage[3], b) transmission or c) both storage and transmission in the Cost Allocation Study based on OEB-approved methodologies.*

39) Beyond the reclassification described in note 3, please provide a list of any shifts in Dawn or Tecumseh costs between storage and transmission after Phase 1 or Phase 2 proceedings.
   a) Please identify any shifts between in- & ex-franchise customers.

Preamble: EGI evidence states in paragraph 10 c) ii.: *Dawn Measuring and Regulating – Enbridge Gas functionalizes measuring and regulating related costs between the storage and transmission functions based on the forecasted annual storage and transmission activity at Dawn.*

40) Please show how this allocation is determined using actual forecasted activity.
   a) Please show how injection and withdrawal activity is used in this determination.

Preamble: EGI evidence states in paragraph 20: *Costs related to the gas supply commodity procured by Enbridge Gas for sales service customers are classified as gas supply commodity. The gas supply commodity costs also include third-party transportation costs to transport the gas supply commodity for sales service customers to a gas supply point of receipt, such as Empress, Dawn, Parkway, Kirkwall, Niagara or Chippawa.*

41) In the proposed allocation, will system gas customers be charged for the full cost of TCPL FT Demand from Empress to Dawn for system gas supply procured in Alberta?
   a) Please describe how these actual TCPL FT invoice costs are streamed to System gas.

Preamble: EGI evidence states in paragraph 21*: Load balancing costs are categorized into transportation demand and commodity. Load balancing transportation demand costs include third-party transportation demand costs, incremental to the transportation required to meet the average annual demands, that are required to meet design day demand. Load balancing commodity costs include gas supply load balancing costs to meet above average day demands. These costs are incurred by contracting for peaking services and purchasing incremental gas supply over the winter period to meet seasonal and design day demands for all customers.*

42) Do the load balancing commodity costs include transportation demand costs beyond those embedded in a peaking service price? Please explain.

Preamble: EGI evidence states in paragraph 22: *Third-party demand costs to transport gas to the delivery area from a gas supply point of receipt to meet average annual demands are categorized as transportation demand costs. The transportation demand costs are driven by the need to meet average annual demands for both sales service and bundled DP customers.[4] For cost allocation purposes, Enbridge Gas assumes long-haul transportation contracts are used to serve average annual demands in each respective delivery area, with any remaining average annual demands met through the use of short-haul transportation contracts.*

[4] *DP customers are obligated to deliver gas to Empress, Dawn, Parkway and/or Enbridge CDA.*

43)For the DP customers, please show a breakdown of the functionalization and allocation of the asset costs when delivering to these respective delivery points.
a) Please ensure clarity on the allocation to transportation for landed Dawn purchased gas for any average demand needs.

44) In paragraph 24, EGI states it directly assigns the third-party transportation fuel costs. Please describe how the third-party transportation fuel costs are determined for the purposes of ratemaking.
a) Please provide a description of how the actual fuel utilization is reconciled.

Preamble: EGI evidence states in paragraph 26 and 29*: The storage demand costs are further classified as deliverability, space and operational contingency…. The amount classified as operational contingency is based on the 10.8 PJ of filled space of the total operational contingency of 15.6 PJ.*

45) Please confirm that Phase 2 evidence stated that operational contingency would be managed inside of storage targets.
   a) How are determined costs for operational contingency allocated?
   b) Please outline and show the differences in the allocation operational contingency costs before and after Phase 2.

Preamble: EGI evidence states in paragraph 31: *Base pressure gas and gas in storage working capital are classified as storage space. The base pressure gas is a permanent investment required to operate the Company's storage pools, while the gas in storage working capital represents the Company's regulated storage inventory.*

46) How is the base pressure gas and gas in storage working capital allocated to the non-utility? Please explain fully.

Preamble: EGI evidence states in paragraph 32*: Storage-related compressor fuel, UFG, company use gas and fuel on market-based storage contracts are classified as storage commodity, as these costs vary with storage volumes.*

47) Please clarify if the storage volumes are a function of space allocated or some other approach such as activity-based. Please provide the derivation.

Preamble: EGI evidence states in paragraph 35*: Enbridge Gas classifies Dawn Station, Kirkwall Station and Parkway Station separately from the other Dawn Parkway System costs. Dawn Station and Kirkwall Station classifications include the demand costs for measuring and regulating and mains related to the stations. Parkway Station classification includes both the compression and measuring and regulating demand costs. The remaining Dawn Parkway System demand costs, including transmission mains and compression (Dawn, Lobo and Bright), are classified as Dawn Parkway.*

48) Please define what the word mains means in the context of these two sentences (one station, one pipeline we assume).

Preamble: EGI evidence states in paragraph 37: *Enbridge Gas classifies the demand costs of the Albion and Panhandle/St. Clair systems to each of the respective classifications. The direct costs of these classifications are assigned based on the Company's plant investment, related depreciation, and operating costs.*

49) To which respective allocations is EGI referring?
   a) How are recoveries from TCPL utilization of the Albion pipeline allocated?
   b) Please provide reference showing those recoveries in this evidence.

Preamble: EGI evidence states in paragraph 41 b): *Distribution customer costs include the customer-related component of mains, services, compressor equipment, meters and customer stations.*

50) Please provide a list of the specific compressors that are deemed to be distribution.

Preamble: EGI evidence states in paragraph 42 and 42 b): *Distribution mains costs are classified between demand and customer using the zero-intercept methodology, which estimates the percentage of distribution infrastructure that is necessary to provide customers access to natural gas service… In the 2024 Cost Allocation Study, about 43% of distribution mains are classified as customer-related and 57% are classified as demand-related.*

51) Please provide a reference to a more detailed description of this methodology and where the allocations are determined in this evidence. If not in this evidence, please provide the description and a working spreadsheet showing the determination of the allocations.

Preamble: EGI evidence states in paragraph 44: *Other revenue functionalized to distribution includes revenue from various charges. The other revenue related to customer accounting charges, such as late payment penalties and new account charges, is classified to customer specific. The other revenue related to the system expansion surcharge (SES), temporary connection surcharge (TCS), and the RNG station charge is classified in proportion to the revenue requirement incurred to connect new customers, such as mains, services, meters and stations.*

52)Are these other revenues paying down the asset balance to reduce the Revenue Requirement of the facilities? Please explain fully.

Preamble: EGI evidence states in paragraph 52: *Load balancing commodity costs are allocated to in-franchise rate classes that require storage services. Load balancing commodity costs are incurred by contracting for peaking services and purchasing incremental gas supply over the winter period to meet seasonal and design day demands for all customers. Enbridge Gas meets the storage requirements of customers through a combination of cost-based storage, market-based storage and through the load balancing gas supply purchases. As such, these costs are allocated to in-franchise bundled rate classes in proportion to design day demands less design day deliveries and semi-unbundled and unbundled services based on design day demands from storage.*

53) For semi-unbundled and unbundled services, please explain why the allocation factors are not generated by Contracted Demand less Design Day deliveries (versus Design Day Demand).
   a) Please answer the same question for Storage Demand – Deliverability described in paragraph 58.

54) For Storage Demand – Operational Contingency described in paragraph 60, please show the respective usages of contingency and the allocation between the utility and non-utility for the components of the 15.6 PJ of space.
   a) Has EGI changed its operation in light of the change to designation of operational contingency space being managed inside of storage targets?
   b) Please provide the monthly level of storage fill that EGI is targeting.
   c) As of the first of June 2025, EGI continues to show a yellow light on its storage operations which inhibits parties ability to inject on an interruptible basis while gas prices have been low.
      i) Has Legacy Union Gas or Enbridge Gas storage ever had the yellow light on limiting storage injections as of the first of June?
      ii) Please show the historic month-end fill for the individual Union and Enbridge storage pools for the last 5 years including the start of 2025.
      iii) Please explain the issue(s) causing a limitation to full storage service.

55) For Transmission Demand – Dawn Station described in paragraph 63, please:
   a) Elaborate on how the bi-directional design day demands at Dawn are determined.
   b) Show or provide a specific reference to the actual allocations for 2024.

56) For Transmission Demand – Kirkwall Station described in paragraph 64, please clarify if the bi-directional is determined based upon the in to the Kirkwall connection to the Niagara Line and out of the D-P system or in some other fashion. Please explain fully.

REF: Phase 3, Ex. 7, Tab 1, Schedule 4

Preamble: We would like to understand better the EGI proposal to change the Board-approved Cost Allocation Methodology for the Dawn-Parkway system.

57) When the proposed methodology Parkway Compression costs is allocating to in-franchise rate classes, the allocator is described as "in proportion to Dawn Parkway design day demands" but without reference to "distance weighting".
   a) Please clarify if the proposed methodology is abandoning "distance weighting".
      i) If so, please provide the principle(s) behind this abandonment for compression.
      ii) Please provide the quantity of design day demands for in-franchise and ex-franchise for Parkway Compression.
      iii) Please re-calculate the allocations using "distance weighting" and provide a revised Cost Allocation as provided in Attachment 1.

58) Please confirm that the Kirkwall station does not have compression.
   a) If not confirmed, please specify the compression and the direction of flow.

59) When EGI proposes to change classification of Dawn Parkway measuring and regulating costs in paragraph 32, is EGI referring to all measuring and regulating costs on the Dawn Parkway system including those at Bright and Lobo?
   a) If so, please provide the principle(s) behind changing the allocation based on bi-directional design day demands at Dawn.

60) When EGI proposes to change the cost allocation for measuring and regulating and compression at Dawn in paragraph 31, no mention is made of allocations of any of those functions to storage. For each of the three functions, please provide:
   a) The current approved allocation by percentage between storage and transmission for 2024.
   b) The proposed allocation by percentage between storage and transmission for 2024.
   c) If the percentages for a) and b) are different, please calculate the allocations based upon a) and update Attachment 1 with the results.

Preamble: EGI evidence states in paragraph 42: *With the proposed changes to Dawn Station and Parkway Station described in Section 1, the distance credit benefit previously provided to Union South rate classes is no longer reflective of the PDCI costs. Based on the 2024 Cost Allocation Study, the estimated distance credit benefit is approximately $3 million compared to the PDCI costs of approximately $15 million, which illustrates that the value of the PDO deliveries provided to in-franchise customers through the distance credit is not equal to the PDCI payment costs.*

61) Paragraph 42 compares the cost of $15M for the PDCI with the estimated benefit to in-franchise customers of $3M. Please explain:
   a) The basis for the determined cost of the PDCI.
      i) EGI's views on the appropriateness of that approach given the proposed re-allocations.
   b) If the difference between the cost of the PDCI and the rate benefit to in-franchise customers currently exists, who would be benefitting from that difference if the methodology is not changed?
   c) For the 5 coldest days of 2024 or 2025, please provide:
      i) The total maximum daily flow leaving Dawn toward Parkway
         (1) The amount that was for in-franchise UGL
         (2) The amount that was for in-franchise EGD
         (3) The amount that was for ex-franchise demand contracts
         (4) The amount that was for C1 service contracted for less than 1 year.
         (5) The amount that was generated to provide an exchange or other service to ex-franchise customers.
      ii) The pressure at the suction side of Parkway alongside the minimum design pressure.
      iii) The amount of physical flow of gas through Parkway headed east (or negative if headed west).

62) Please provide the calculation that supports the payment of the new PDCI rate aligned with the changes proposed.

7.3-FRPO-63

REF: Phase 3, Ex. 7, Tab 3, Schedule 1, Attachment 4, line 106

63) Please provide a description and explanation of the determination of the 15,337 labelled as Gas Supply Optimization in the above reference.
a) Please describe the principles behind its classification to Load Balancing Transport and Transportation Demand.
i) How are the allocators determined?

8.1-FRPO-64

REF: Phase 3, Ex. 8, Tab 1, Schedule 3, Attachment 3

64) Please explain how rate 331 results in a 46.436 Revenue to Cost Ratio

8.2-FRPO-65-74

REF: Phase 3, Ex. 8, Tab 2, Schedule 2

65) For Table 1, please provide a description and calculations that determine the respective Rate Rider C values of 1.8481 cents/m^3 for Union Northeast and 2.2468 cents/m^3 for Union South.
a) Please confirm that the combination of reference price and Rider C results in a higher combined price at Dawn than Union Northeast
b) Please provide principled rationale that contribute to the cost at Dawn being higher that Union Northeast.
i) The last sentence in paragraph 11 refers to the under-recovery of the reference price. Using references to QRAM exhibits, please provide the tables and mechanics to calculate these riders.

66) In paragraphs 19 to 21, EGI describes a charge to the sales service customers for deliveries to Dawn from Ojibway or St. Clair and a credit back to in-franchise customers for the benefit of meeting demand costs on these lines.
a) Do these charge/credit reflect a supply-side IRP that helps meet demand on those lines? Please explain fully.
b) Is this charge/credit approach new to the ratemaking of EGI (or its legacy companies)?

i) If not, where else is system supply used to meet demand and this charge/credit used?
ii) Is this approach used for deliveries to the EGD EDA?
(1) If not, why not?
iii) Is the ability of contracted system gas supply to an area other than Dawn to meet demand considered in the Gas Supply plan or Landed Cost Analysis?
(1) If not, why not?

Preamble: EGI evidence states in paragraph 30: *The gas supply load balancing charge for the EGD rate zone is applicable to sales service and bundled DP customers. The charge recovers the upstream transportation costs required to transport gas from Dawn to the EGD rate zone to meet above average day demands. The gas supply load balancing charge is recovered in delivery rates for general service rate classes.*

67) Where is the gas supply load balancing charge currently recovered for contact customers?

Preamble: EGI evidence states in paragraph 31: *For the Union North rate zones, Union North West and Union North East rate zones' gas supply transportation rates are applicable to sales service and bundled DP customers in each rate zone. The gas supply transportation rate for each rate zone recovers the upstream transportation costs required to transport gas from Empress to the delivery area for the Union North West rate zone and from Dawn to the delivery area for the Union North East rate zone. Also included in the transportation rate is the cost of the Dawn Parkway System. The Union North rate zones also recover upstream transportation and Dawn Parkway System costs to move gas to and from storage in gas supply storage rates. The rate design for Rate 20 and Rate 100 includes a gas supply demand and transportation rate.*

68) Please explain how STS costs are allocated and recovered for in-franchise customers.
a) How are the transportation costs including Dawn-Parkway calculated, allocated and recovered for Direct Purchase customers who:
i) deliver at Dawn?
ii) deliver to the delivery area in the rate zone?
iii) Please explain fully.

Preamble: EGI evidence states in paragraph 34 & 35: *The approach of offering two transportation charges for bundled DP customers based on point of receipt is similar to the current EGD rate zone methodology. The transportation charges are set to recognize the commodity price difference between the points of receipt for bundled DP customers and allows for DP customer receipts at different locations without the need to separate customers into rate zones. The rate design is also consistent with the one rate zone approach, as customers that deliver gas to Dawn or Empress pay either a common transportation rate or a common Western transportation rate, respectively, regardless of their location in the Enbridge Gas franchise area.*

Bundled DP customers with an Enbridge CDA point of receipt[8] will pay the ***transportation charge*** *and will also receive the PDCI credit for their deliveries at the Enbridge CDA to harmonize with the current approved approach for Union South customers with a Parkway Delivery Obligation (PDO). Enbridge Gas is proposing to expand the PDO and PDCI offering to customers located in the EGD rate zone who currently are contractually obligated to deliver gas at the Enbridge CDA9. These customers provide a similar system benefit as the DP customers in the Union South rate zone with a PDO, as they have the option to deliver gas to Dawn, which would otherwise increase the Dawn Parkway System demand. Similar to Parkway, the Enbridge CDA is located at the east end of the Dawn Parkway System and for the purposes of this evidence, Parkway and the Enbridge CDA will be collectively referred to as Parkway. This approach harmonizes customers in similar circumstances across the EGD and Union rate zones. (****emphasis added)***

69) To which of the two transportation charges is EGI referring for the CDA point of receipt?

70) Please clarify if Parkway (as described above) and EGD CDA are the same delivery point.
   a) Please provide a map showing the locations
   b) What are the TCPL tolls to each of those locations? Does TCPL recognize the points as the same delivery point?
   c) Will EGI be allowing deliveries at Union Parkway to meet obligations for customers who have a contractual delivery point of EGD CDA? Please explain fully.
   d) How does that affect the proposed transportation charge for deliveries to these points from:
      i) Empress?
      ii) Dawn?

71) In paragraph 36, EGI describes its proposed treatment of direct purchase deliveries to Empress.
   a) Please confirm that TCPL Mainline firm deliveries contribute to EGI Gas Supply plan to the delivery area & distribution design day demands for those areas.
      i) If not confirmed, please explain fully the contribution made by TCPL Mainline firm deliveries.
   b) For customers who receive gas through TCPL at one of its delivery points along the Mainline in Union North or EGD EDA, did EGI consider providing a credit to those rate classes that receive delivery through TCPL similar to the treatment of system gas receipts at Ojibway and St. Clair?
      i) If not, why not? Please explain fully.
   c) For direct purchase customers who deliver gas on a firm basis along the Mainline in Union North or EGD EDA, did EGI consider providing a credit to those rate classes that receive delivery through TCPL similar to the treatment of system gas receipts at Ojibway and St. Clair?
      i) If not, why not? Please explain fully.

72) Please explain fully EGI's rationale in restricting extension of current rights and subsequently eliminating the Western point of receipt at Empress.
   a) Please ensure the explanation
      i) explains what EGI proposes to do with the TCPL capacity that underpins the service
      ii) quantifies the cost to continue the service

73) Please confirm that the Western transportation charge price differential described in paragraph 37 reflects the market rate of the transportation versus the cost of the toll between the two locations.

74) For the gas supply transportation charge component described in paragraph 41 b), if the gas lands at Dawn for a Union South customer fed from Dawn-Parkway is there a transportation charge component to move gas to and from storage?

   a) If so, is that charge not duplicating the transmission demand charge allocated from the Dawn-Parkway system?

8.2-FRPO-75-94

REF: Phase 3, Ex. 8, Tab 2, Schedule 3

75) Please clarify if Christensen Associates Energy Consulting (Christensen) is acting as an independent expert or consultant to EGI?
   a) Please file the end of phase reports in the final draft form from Christensen prior to any modifications requested by EGI.
   b) Please provide a list of recommendations from Christensen that were changed by EGI.
   c) Please identify any changes to the methodology or other development steps made since November 2022 beyond updating the amounts for the OEB-approved Test Year.

76) Paragraph 23 indicates that Christensen analyzed four years of billing date for each customer. Please provide the years that were analyzed and the rationale to choose those years.
   a) Please clarify if there were issues with the more recent Union Gas data due to the meter reading and billing issues of the last 4 years.

Preamble: EGI evidence states in the first bullet under paragraph 37: *The key characteristics can be summarized as:*
• Charges specific to each customer's design day demand, reflecting individual size and consumption patterns. Where customer energy choices like hybrid heating change the consumption profile for groups of customers, Enbridge Gas is confident SFVD will be able to accommodate this outcome;

77) Please provide the evidence that EGI has to support this confidence that SFVD will be able to accommodate.

Preamble: EGI evidence states in the third bullet under paragraph 37: *The key characteristics can be summarized as:*
• Continues to support energy conservation initiatives by making the Company agnostic to conservation programs and by ensuring the Company's delivery revenues are not at risk because of declining consumption, therefore, leading to a greater opportunity to partner, sponsor and/or support a broad range of third-party conservation programs;

78) Please provide EGI's views on the impact on the customer incentive to adopt DSM measures.

79) For Figure 7 in Attachment 1, please explain the use of median vs. average consumption profiles.
   a) For large commercial, please redo figure 7 using averages.

Preamble: EGI evidence states on page 32 of Attachment 1: *Using the base and heat factor estimates, a predicted value of peak day consumption may be computed as:*

predicted peak day consumption = (est. base factor) + (est. heat factor) x (max HDDs)

80) Please provide the R squared value for the correlation achieved in the analysis on a customer level.

81) Since the design day HDD varies geographically (as demonstrated by current HDD's in rate zones), will the daily maximum HDD vary and be prescribed for the current rate zones?
   a) If not, how will this variance be considered and included in the proposed approach?

Preamble: EGI evidence states on page 35 of Attachment 1: *Both to produce estimated peak-day consumption based on actual weather, and for comparative purposes with our own analysis, we employed the base and heat factors produced with Synergi Gas to compute estimated peak consumption and load factors based on the actual coldest days observed in the 2016-2019 period.*

82) Please provide a description and the algorithm that is being used to calculate the estimated peak consumption and load factor based on the actual coldest days observed.

Preamble: We would like to understand the analysis of load factors and revenue classifications in Table 17.

83) Please provide a description of the arithmetic equation/algorithm that Christensen is using to calculate Load Factors.

84) For Table 17, for each Combined Revenue Class, please provide the qualification criteria to place customers into the respective classes.
   a) Given the above criteria, please explain the higher load factors for Classes 60, 79 and 86.
   b) Please provide the Average Load Factor for each Revenue Class as opposed to the Median.
   c) Please provide the monthly consumption data along with monthly HDD used to generate these average load factors in a working Excel spreadsheet.

85) In a separate table, please provide the load factors for the combined Revenue Classes associated with residential, schools and apartments (i.e., all apartment classes together, etc.)

Preamble: EGI evidence states on page 55 of Attachment 1: *The legacy LEGD GS rates divide customers into residential (Rate 1) and non-residential (Rate 6) groups. Within Rate 6, the LEGD billing systems distinguish mass market and large volume billing customers, which roughly segments non-residential customers into smaller and larger consumption categories. There is some overlap of Rate 6 mass market and LVB customers, although consumption quantities that are in the upper tail of the consumption distribution for mass market customers are in the lower tail of the LVB distribution.*

86) What is the key distinction that Christensen is making with LVB and MM?
   a) What implications does the distinction(s) have for appropriate ratemaking?

87) Using a similar format to Table 31, please provide the customer counts in the volume account categories for apartments only in the LEGD zone.

Preamble: EGI evidence states on page 6 of Attachment 5: *In summary, the recommended approach is to use regression analysis that makes use of currently available customer data, supported by a defined method for handling exceptions. It would be valuable to develop a standardized method for obtaining consumption data from the billing system and return calculated DDD to that system. This appears to be an incremental change to EGI's current computational and billing capabilities.*

88) From all of the analysis, what key aspects supports the choice of the regression approach over other methods such as analytical? Please explain fully.

Preamble: EGI evidence states on page 28 of Attachment 5: *The challenge of bill impact minimization arising from rate harmonization appears to be met well by the SFVD design. The "upper tails" analysis reveals that there are relatively few customers experiencing large bill increases, and these customers are likely those experiencing low revenue/cost ratios at present, since the illustrative rates of the analysis are tied directly to cost to serve.*

89) Please provide more data and explanation on the "upper tails" analysis.

90) Tables 13 and 14 provide the names of Canadian and US utilities, respectively, using Demand Charges. What percentage of total utilities do those using Demand Charges represent in their respective countries?

91) For the data used in the Example of Design Day Demand, Regression Method in Figure 10, how does the 0.624 compare to the residential baseload using the Analytical Method?

92) Please extend Tables 15 and 16 to include the Mean and Median Design Day Demands for Rate 6 all apartments only using LEGD data.

REF: Phase 3, Ex. 8, Tab 2, Schedule 6

93) For the proposed rate E62, please provide the firm demand used for allocation of costs to each of the 5 distributors.

REF: Phase 3, Ex. 8, Tab 2, Schedule 9

94) In Attachment 2 on page 1, the forecasted usage provides 2024 Forecast Usage. In the E01 category, a comparison of the Delivery Demand Charge with the Delivery Commodity Charge yields interesting numbers.
   a) Please confirm that usage in the Delivery Commodity Charge would represent the annual consumption.
   b) Please confirm that the usage in the Delivery Demand Charge would represent the Design Day consumption.
   c) A comparison of the Design Day consumption with annual load suggests that the Design Day would represent 12% of the annual consumption. A similar 12% ratio is represented in the 2024 Forecasted Usage for E02.

i) Please provide the methodology used to develop the Design Day numbers in Attachment 2.
ii) Please comment on the reasonability that a peak day would generate 12% of the annual consumption.
iii) Please provide data that supports that reasonability.

8.2-FRPO-95-110

REF: Phase 3, Ex. 8, Tab 4

95) In section 4.1 of Schedule 2, EGI describes its proposal for the discontinuation of the Rate 25 Sales Service.
a) Please describe the transportation and potential storage assets or contracts used to provide the service to the Union North Rate zone.
i) Will EGI be in a position to reduce any transportation contracts as a result of eliminating the service?
ii) Will EGI be able to balance other customers more effectively without having to make arrangements to provide the Rate 25 service?
iii) Will there be any cost reductions for non-participants in:
(1) Union North
(2) Union South
(3) EGD Rate zone
iv) What benefits, if any, will EGI garner by eliminating the service?

Preamble: In paragraph 18 of Schedule 3, EGI describes the creation of the Northwest and Northeast rate zones in the Dawn Reference Price Decision. We would like to understand better the assessment of the total annual bill impact for customers in the NDA.

96) In the evidence in that proceeding, did Union provide an annual bill impact that includes the cost of storage and other load balancing mechanisms to meet seasonal and peak requirements for the NDA using:
a) Empress as a receipt point?
b) Dawn as a receipt point?
c) If so for both, please provide evidence that defines the methodology and update the methodology with costs drawn from the 2024 Cost Allocation study.
d) If not for both, please provide an assessment of the annualized cost for a customer for all components of the bill (gas supply, transportation, storage/load

balancing, other) for customers in the NDA with each of Empress and Dawn as distinct alternative receipts under the current standard:
i) Rate 1
ii) Rate 10

e) Please provide the same annualized cost customers in the WDA.

Preamble: In paragraph 21 of Schedule 3, EGI describes the recovery of upstream compressor fuel costs in transportation rates. We would like to understand more about these recoveries.

97) Please confirm that these recoveries are for both system gas and direct purchase.
a) If not, please clarify.

98) Please describe how the costs of fuel are recovered for Union North customers for system gas and direct purchase customers who have Dawn as the receipt point for their upstream supply. Please explain fully.

Preamble: In Table 2, EGI summarizes the current and proposed changes by Bundled DP component. In note (2), EGI clarifies: *Primarily Dawn unless Parkway or ECDA is required by Enbridge Gas.*

99) Does TC Energy treat Parkway and ECDA as the same point for delivery at the same cost? Please clarify.
a) Is EGI proposing that they can dictate that a direct purchase customer must deliver at the ECDA at the company's discretion? Please explain fully.

Preamble: In paragraph 44, EGI evidence states: *In the customer engagement, Enbridge Gas asked customers about eliminating the sale of system supply to bundled DP customers in the Union North rate zone in exchange for a higher DCQ. Most of the customers who responded had no opinion or didn't know, among those who did, slightly more were not in favour of this change. Of those not in favour, there was no explanation provided of their concern related to the proposal. Most customers responded favourably to a similar question where the elimination of system sales to unbundled DP customers in the Union North rate zones was accompanied by an increase in the tolerances for balancing service, as provided in Phase 3 Exhibit 8, Tab 4, Schedule 5. Customers may not have appreciated that the proposed elimination of system sales to bundled DP customers in the Union North rate zones was accompanied by an increase in the customer's DCQ for them to supply their own gas. The customer engagement results for bundled and unbundled DP customers are provided at Phase 3*

Exhibit 1, Tab 6, Schedule 1, Attachment 2, pages 59 to 61 and pages 78 to 79, respectively.

100) Please clarify how a "system sales to bundled DP customer in the Union North rate would receive an increase in DCQ to supply their own gas? Please provide the quantified increment.
   a) If a bundled DP customer in the Union North Rate receives more gas, all things being equal, will that customer need to sell more of that gas throughout the year during non-peak periods?
      i) If the DP customer in Union North is delivering gas to Union Northwest, can they sell that gas at Dawn without incremental transport from Union Northwest to Dawn? Please explain.
      ii) If the DP needs to sell that gas, especially after maximizing their CBS tolerance, if they sell their gas at Empress, please confirm that the customer will still have to pay Unabsorbed Demand Costs for their transport.
      iii) Has EGI modelled what the incremental seasonal balancing costs are of accepting a higher DCQ? If not, please estimate and provide.
         (1) Were customers who answered the survey provided any of this information prior to answering the questions regarding elimination of Rate 25? If not, why not?

Preamble: In paragraph 55, EGI provides the current direct purchase DCQ's by point or receipt.

101) Please clarify how much of the 32,500 GJ/day under the OTS service emanate from:
   a) Empress
   b) Dawn
   c) Other
   d) Given the above answers, what is the likelihood that the direct purchase customer currently under OTS could want to change their receipt point to Empress given current market conditions? Please explain fully.

102) Please provide the amount of Union Direct Purchase that originates from Empress for:
   a) Union Northwest
   b) Other Union North
   c) Union South
   d) Union South that includes meeting contracted delivery obligations to Dawn.

103) Do Union Direct Purchase customers use the same Direct Purchase Administration systems:
a) Currently?
b) Planned as part of future integration?

Preamble: In paragraph 59, EGI evidence states: *As noted in Section 1.2, the Union North East rate zone moved from being served from Empress to Dawn and bundled DP DCQs moved accordingly.*

104) Please provide the amount of Direct Purchase deliveries to the now Union North East rate zone deliveries points that had an Empress receipt point in:
a) 2014
b) 2024
c) Did EGI survey Direct Purchase customers in the Union North East rate zone to inquire if there was interest in moving their obligation receipt point to Empress?
   i) If not, why not?
d) Please explain the concept of basis differential.
   i) For the years of 2014, 2024 and forecast calendar 2026, from a referenced industry publication, please provide the annualized average basis differential between:
      (1) Empress and Dawn
      (2) Empress and Parkway
      (3) Empress and Iroquois

Preamble: In paragraph 66, EGI states: *Transitioning EEDA and Empress deliveries in the EGD rate zone and bundled DP Empress deliveries in the Union North West rate zone to Dawn rationalizes the number of points of receipt and provides customers better access to supply and balancing transactions at Dawn. It also provides customers and marketers the ability to consolidate more of their pools as outlined in Section 7.3.*

We would like to understand the end use customer perspective on this change.

105) From an end use customer perspective:
a) Does the described rationalization represent an enhancement or restriction of choice?
b) What percentage of gas that flows through Empress is produced in Canada?

c) What percentage of gas that flows through Dawn is produced in Canada? Please provide the simplifying or clarifying assumptions in that estimation.
d) If a customer wanted to consolidate their pools prior to now, what restrictions are currently in place from EGI that would inhibit that choice? Please explain fully.

Preamble: In paragraph 67, EGI states: *In the customer engagement, customers were asked about moving the DP customers' receipt point obligations from the Empress and EEDA receipt points to Dawn. Most customers that responded with an opinion were in favour of moving the points of receipt to Dawn.*

106) Of those customers that responded with an opinion on most item, how many:
a) Responded with an opinion on this question?
b) Currently had receipt point obligations at Empress?
c) Previously had receipt point obligations in the EEDA?

107) If the Board approves the requirement to shift receipt points from Empress or ECDA to Dawn,
a) What will EGI do with the contracted capacity on TCPL that underpins the Empress receipt deliveries?
i) If EGI plans to reduce its contracted capacity on TCPL, will that increase the forecasted demand flowing east on the Dawn Parkway system?
(1) Please provide a schematic of the Dawn Parkway system peak day showing Design Day flows through the system for the 2024 winter.
(2) Keeping all other things equal, please update the schematic with flows that would occur if EGI turns back the amount of Empress capacity associated with the sum of changes that move customer receipt points from Empress to Dawn (i.e., both EGD WTS and Union North Bundled DP).
(3) Currently, what is the forecasted year for the next Dawn-Parkway capacity expansion?
(a) How would that forecast year be impacted by these required Direct Purchase receipts to Dawn? Please explain.

Preamble: In paragraph 73, EGI states: *In the customer engagement, customers were asked if they were interested in delivering their DCQ to Ojibway or Kirkwall. Only two customers responded to this question indicating an interest in a total of 1,300 GJ/day (0.2% of total bundled DP deliveries). As there was limited interest, Enbridge Gas is not proposing to offer additional points of receipts beyond those currently available.*

108) Please confirm that current Parkway obligated deliveries reduce the amount of facilities required to meet eastern flow on a Design Day.
   a) Does EGI agree that this arrangement would be considered a supply-side Integrated Resource Planning Alternative (IRPA).
      i) If not, please explain why not.

109) In seeking customers feedback on EGI service harmonization proposals, what was the total bundled DP deliveries of customers that did not reply (i.e., did not receive or did not respond to their requested input)?
   a) Were the customers who did respond offered a delivery incentive for firm, obligated deliveries?
      i) If not, why not?
   b) Could firm obligated deliveries at Kirkwall benefit the capability of the ability of the Dawn-Parkway system on a Design Day similar to Parkway obligated deliveries?
      i) If not, please explain why not?
      ii) If yes, please estimate what the incentive could be recognizing the benefit of Kirkwall deliveries may be less than Parkway?

110) Please confirm that EGI is proposing to provide Panhandle customers the benefit of the EGI-controlled system gas delivery at Ojibway.
   a) Please describe how system gas delivery benefits are being streamed to reduce design day costs on the Panhandle system.
   b) If the Board were to order the introduction of an Ojibway obligated delivery incentive, using the same approach as the Parkway Delivery Commitment Incentive, please estimate the amount of incentive that could be provided for obligated deliveries.

9.1-FRPO-111-127

REF: Phase 3, Ex. 9, Tab 1, Sch. 2 & EB-2024-0111 Settlement Agreement

Preamble: In paragraph 7, EGI states: *The proposed changes to the gas supply variance accounts are in response to the amalgamation and the harmonization of the existing gas supply plans into one plan for Enbridge Gas, as provided at Exhibit 4, Tab 2, Schedule 1 of Phase 13 and Phase 24 of the Application*

Preamble: We would like to understand better how EGI will track the cost of Dawn purchases in the winter as a load balancing alternative to market-based storage as agreed to in Phase 2 of the rebasing proceeding.

111) Using data provided for the April 1, 2025 QRAM, please provide the evidence that would be filed in a one rate zone and two rate zone (north south) scenarios.
   a) please show how the winter purchases at dawn would be shown for prices and quantities fixed before Nov. 1st, after Nov. 1st and those left on index (if any).

Preamble: Paragraph 8 describes who the components of gas supply variances are currently tracked and recorded.

112) Please describe how gas supply related load balancing costs are tracked and recorded for:
   a) Union South
   b) Union North
   c) Please ensure the above explanations include descriptions of any other gas supply, transportation, market-based contract agreements or customer recoveries such as CBS are included.

Preamble: Paragraphs 9 describes EGI's proposal to use a similar approach used for the Union rate zones.

113) When does EGI normally fix the price for contracted deliveries at Dawn? Please explain fully.

114) Are forward purchases such as base daily deliveries for system gas in winter differentiated from additional purchases to supplement during cold February weather?

115) How does EGI propose to track and report on the cost consequences of volume variances from forecast?
   a) How will incremental load balancing related volume variances be segregated from Gas Supply plan purchases including system supply versus Direct Purchase? Please describe fully.

116) How does EGI propose to track and report on the cost consequences of price variances from forecast?
   a) How will incremental load balancing related price variances be segregated from Gas Supply plan purchases including system supply versus Direct Purchase? Please describe fully.

117) For the above questions, if the Board approves a two rate zone model for Gas Supply and Distribution costs, please describe how the above answers to the previous two questions may change to allocate costs to the North versus South.

118) - DP it is a cost - system gas? or collected from all customers as load balancing (what if storage was not sufficient for system gas - load balancing?)

Preamble: Paragraphs 21 describes EGI's proposal to *establish a new Third-Party Transportation Variance Account that will record the difference between the actual cost of upstream transportation, including unutilized capacity and fuel, and the forecast cost of upstream transportation, including unutilized capacity and fuel, provided to sales and direct purchase (DP) service customers as approved by the OEB.*

119) How are these costs determined given the differential between forecast and actual market driven cost at location or based difference in transportation tolls?

Preamble: Section 1.3 outlines EGI's proposal to consolidate multiple accounts into the Load Balancing Price Variance Account.

We would like to understand this proposal better especially given commitments provide by EGI in the Phase 2 Settlement Agreement to evolve its plans for Load Balancing through additional Dawn winter purchases.

120) If the load balancing and spot gas accounts are merged, how would EGI track and allocate costs separately for design day costs versus seasonal load balancing variance for the purposes of allocation? Please explain fully.

121) How will EGI differentiate between costs related to variance from the price forecasted and variance from volumes needed to load shape?

Preamble: Paragraph 25 includes*: Load balancing transactions include the incremental costs of shaping gas supply purchases at Dawn[12] and peaking supplies. The variance account will also record the price variance on any incremental spot gas purchases made on behalf of bundled DP customers for load balancing as required.*
Preamble: Paragraph 27 includes*: Enbridge Gas will manage incremental balancing needs beyond those that the bundled DP customers manage through their checkpoint obligations. For example, if a winter remains colder than normal after February then Enbridge Gas will purchase additional spot gas to ensure that there is enough gas on the system to meet the bundled DP customers' needs. The incremental cost of the spot gas purchase will be recorded in the Load Balancing Price Variance Account. Bundled DP customers that were lower relative to their forecast BGA curve[13] during that post-checkpoint period would be allocated a share of those costs through disposition of the Load Balancing Price Variance Account. Bundled DP customers that were not lower at that point would not receive any disposition of these balances.*
We would like to understand how these costs related to incremental spot gas purchase made on behalf of bundled DP customers will be identified at the transaction level to be differentiated from those to balance system gas?

122) How will EGI identify and segregate purchases made to balance Direct Purchase from those made to balance system gas.
   a) If a Direct Purchase customer makes incremental purchases to meet their defined February balancing control point, will they be allocated costs identified as driven by Direct Purchase customers?
   b) Is System Gas subjected to a two-point balancing requirement similar to Direct Purchase customers, please explain fully.

123) Please specify the types of incremental balancing needs (beyond checkpoint obligations).

124) In the example of colder than normal after February, if a Direct Purchase customer is compliant with its February checkpoint and exceeds the amount of gas actually needed in February, will they still be allocated costs driven by colder weather post February? If so, please explain the equity of such an approach.
   a) If system gas is not subjected to a February balancing point, how will EGI reduce the potential cross-subsidy of system gas by Direct Purchase customers who have already paid for additional gas supply to exceed their February check point?
   b) How will these costs be treated if Direct Purchase customers exceed their February check point and their March check point if there was one and it is determined that EGI over-bought relative to need for Direct Purchase customers?

Preamble: Section 1.4 outlines EGI's proposal to consolidate the Inventory Revaluation Variance Account.

125) Using the April 1st, 2025 QRAM, please provide a description of how changes in the reference price flow through the respective accounts for recovery including allocation to existing rate classes.
   a) Please produce the consolidated account and the respective initial accounts in a live Excel spreadsheet.

Preamble: Paragraph 39 provides a summary, without detail, of what EGI would propose as changes if the Board does not approve changes to rate zones. We would like to understand how EGI would deal with a two rate zone (North and South) for both gas supply and distribution.

126) How will the EGI handle the UDC associated with balancing Union North in the event that the Board approves two rate zones (North and South) for both gas supply and distribution rates?

127) How are the costs of rate base for storage assets allocated in the two rate zone model? Please explain?
   a) How would seasonal and peak load balancing costs be segregated to be allocated to the proper rate zone?

9.2-FRPO-128

REF: Phase 3, Ex. 9, Tab 1, Sch. 3

Preamble: Paragraph 6 seems to contemplate customers electing their rate class upon harmonization.

128)To what class(es) of customers is EGI referring given rate class qualifications which have been part of each legacy utilities past rate structures.

a) Please explain the choices that EGI foresees may be available.
b) What are the revenue requirement implications of those choices.