REF: 2025 GSP, p.5

Preamble: EGI evidence states: ***Cost-effectiveness*** *– If the supply/service option is intended to satisfy average day needs, Enbridge Gas will evaluate it based on landed costs (i.e. $/GJ/d). If the option is intended to meet design day needs, annual costs (i.e. $/GJ/yr) are calculated.*

We would like to understand better EGI's views on the measures of cost effectiveness for the purpose of comparison.

1) Please describe fully the determination of:
   a) The landed cost to satisfy average day's needs. Please ensure the description specifies all of the cost components and how the daily cost is derived including:
      i) Transportation demand charges
      ii) Transportation commodity charges
      iii) Fuel gas
      iv) Load balancing, including:
         (1) Transportation to and from storage
         (2) Fuel gas associated with those transfers
         (3) Storage related charges

   b) The annual cost to meet design day's needs. Please ensure the description specifies all of the cost components and how the annual cost is derived including:
      i) Transportation demand charges
      ii) Transportation commodity charges
      iii) Fuel gas
      iv) Load balancing, including:
         (1) Transportation to and from storage
         (2) Fuel gas associated with those transfers
         (3) Storage related charges

   c) Please provide an Excel spreadsheet showing the derivation of these costs for customers in the:
      i) EGD EDA
      ii) Union North NDA
      iii) Union North WDA

REF: 2025 GSP, p.56, Tables 15 & 16 and

EB-2024-0067 Revised Transcript Stakeholder Conference, p.131-133

Preamble: In past GSP Update proceedings, we have recommended that the quantification of service options provides data that allows a more fulsome comparison. We request the following information to allow the Board to consider additional data which may be of assistance.

2) Please show each step of the derivation to arrive at the Average Cost/Customer Impact for Options shown to the Union EDA.

3) Please confirm that, to some degree, each of the options will require load balancing (e.g., storage, gas purchases, intra-Ontario transport, etc.) to ensure service through the winter months.

4) In an Excel spreadsheet, please fill in the following table to break out the components of the annual bill impact in 2024 for customers in the CDA when the full annual unit costs of gas supply are considered. To ensure clarity, while storage may be recovered in delivery rates, please include it in this table.

Option	Provider	Unit Cost of Delivery to Ontario (Gas/Transport)	Load Balancing Transport (Ontario)	Seasonal Load Balancing (Storage/Purchases)	Total Annualized Gas Supply Cost
		($/GJ)	($/GJ)	($/GJ)	($/GJ)

5) Please provide the same determination of unit costs of Gas Supply for the:
   a) EGD EDA
   b) UNION NDA
   c) UNION WDA

REF: 2025 GSP, p.5

Preamble: EGI evidence states: ***Reliability and security of supply*** – *Characteristics of supply/service option reliability and security evaluated by Enbridge Gas include, but are not limited to: liquidity, nomination performance, delivery performance, transportation distance, service quality, system connectivity, and the* ***magnitude of existing third-party services*** *(e.g., peaking and delivered services) in the Company's portfolio. (****emphasis added****)*

We would like to understand EGI's criteria of the *magnitude of existing third-party services.*

6) Please provide an explanation of the magnitude of existing services.
   a) Please describe the criteria that the company uses and how it applies in the effort to establish reliability and security of supply.

REF: 2025 GSP, p.5

Preamble: EGI evidence states: ***Cost-effectiveness*** – *The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.*

We would like to understand how EGI achieves the principle of Cost-effectiveness.

7) How is cost-effectiveness measured for the gas supply plan and alternative selection when considering the total bill impact of services including load-balancing, on an annualized basis?

REF: 2025 GSP, p.16-18 including Footnotes 23 & 25

Preamble: EGI evidence states: *The annual demand forecast underpinning the Plan was developed using the same methodologies as those utilized to establish the Company's OEB-approved annual demand forecast for the 2024 Rebasing proceeding.*

We would like to understand EGI's approach to developing its demand forecast

8) For the purposes of presenting this 5-year Gas Supply Plan:
   a) Are the annual demand forecasts the same amounts as were filed at the outset of EB-2022-0200 or just the same methodologies? Please explain fully.
   b) Please provide the monthly demand forecast underpinning the Gas Supply Plan.
      i) Please provide the monthly demand forecast arising from adjustments associated with Phase One Settlement proposal.
      ii) Using the monthly demand forecast in i), please provide the adjustments that arise from the ET adjustments noted in footnote 25 on page 17 and to the base average use forecast noted on page 18.

REF: 2025 GSP, p.19

Preamble: EGI evidence states: *By contrast, contract market demand is forecast to remain relatively stable, increasing slightly for the EGD and Union South rate zones due to customer growth.*

We would like to understand better the forecasting process for contract market demand.

9) Has EGI made any adjustments in contract market demand as a result of US tariffs imposed on Ontario products?
   a) If not, how does EGI generally foresee the effects of 35% tariffs if they remain at that level?

REF: 2025 GSP, p.23-24, Table 3 and Footnotes 32-36

We would like to understand better the forecasting process for Delivery Area Design Day Demands described in the Phase One evidence as noted in Footnoted 32.

10) Using EGD EDA (Ottawa), please show the development of the Design Day demand, applying the descriptions under Firm Customer Demand including the footnotes.
   a) Please ensure that the development shows:
      i) Use of 47.5 HDD_w with interruptibles off and the lower HDD_w (historically 35) with interruptibles on.

ii) Use of gate station flows to account for diversity (footnote 33)
iii) Use of general service demand divided by the number of general service customers (footnote 34)
iv) Use of contract customer demand reservation (footnote 35)
v) New customer demand (Forecast Changes & footnote 36)

REF: 2025 GSP, p.25, Table 4

EB-2023-0072 Update, p.36-37; EB-2024-0067 2024 Update, p.48, Table 8 & EB-2020-0091 EGI's Asset Management Plan (2025-2034), Section 4.5

Preamble: The update from 2023 EGI evidence states: *Since the 5-Year Plan was filed, there has been no change in options to serve and no material differences in the evaluation matrix, therefore the preferred strategy is still to procure a third-party service in the near term and to evaluate transportation options to manage future peak day growth. EGI will continue to monitor any shortfall positions and make decisions using the best available information at that time, which may include purchasing transportation capacity that may be available from time to time.*

We would like to understand better the development of the Design Day Demand Forecast.

Net Demand (TJ/d)	23/24	24/25	25/26
EGD CDA	3,378	3,389	3,400
EGD EDA	723	729	736
TOTAL EGD	4,101	4,118	4,136

11) Please confirm that the above table represents the Net Demand for the respective EGD Delivery Areas as evidenced in Table 8 of the 2024 Update.
a) Please provide a reconciliation describing the major drivers of the difference of 200 TJ/day between the Demand in Table 4 in this Plan and the previous year's update.
i) We understand that curtailment likely accounts for some of the difference but was there any methodological change between the 2024 Update and the 2025 plan beyond presentation?

b) What drivers contribute to a reduction in forecasted peak day starting after 2027/28 for EGD CDA?

i) Do these drivers impact EGD EDA? Please explain.

c) Do the design day demands reflect the ET adjustments referenced as being provided in EGI's Asset Management Plan (2025-2034) filed as EB-2020-0091, November 8, 2024, Section 4.5?
   i) If not, why not?

REF: 2025 GSP, p.26 & p.27, Table 5

Preamble: EGI evidence states: *Forecast shortfalls are monitored and re-assessed annually. However, the Plan does not include any excess assets; only those necessary to meet firm design day requirements.*

We would like to understand more about this annual re-assessment.

12) Please provide a summary of the annual re-assessments for each of the last 5 years.
   a) If not included in the summary, please provide the criteria used to determine that the Plan does not include any excess assets.

13) Please expand the information in Table 5 (using 3 separate tables for display purposes):
   a) In one table for the EGD CDA, separate the CDA between the delivery areas that serve Toronto and Niagara adding:
      i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
      ii) Specify the amount of M12 used.
      iii) Provide the components of rights used to meet the supply shortfall (i.e., curtailment, specific new contract paths from section 5.2 and quantities, etc.)

   b) In the second table, present the Enbridge EDA and the Union EDA adding:
      i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
      ii) Specify the amount of M12 used.
      iii) Provide the components of rights used to meet the supply shortfall (i.e., curtailment, specific new contract paths from section 5.2 and quantities, etc.)

   c) In a third table, present the remaining Union North delivery areas adding:
      i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
      ii) Specify the amount of M12 used.

iii) Provide the components of rights used to meet the supply shortfall (i.e., curtailment, specific new contract paths from section 5.2 and quantities, etc.)

14) Has EGI merged any of its TCPL contracts to the TCPL Eastern Delivery Area or optimized its STS contracts to reduce costs and UFG? Please describe what has been done and what limitations EGI must overcome to reduce ratepayer cost.

REF: 2025 GSP, p.29

Preamble: EGI evidence states: *A combination of energy transition-related factors has resulted in reductions to planned expansions of transportation capacity across North America despite demand growth in many regions, exacerbating transportation capacity scarcity on many paths upstream of Enbridge Gas's systems. Recognizing these conditions, transportation capacity providers are increasingly requesting higher tolls and longer-term contracts to secure existing capacity.*

15) Please differentiate between US and Canadian providers (specifically TCPL) in the last sentence. Please explain fully.

REF: 2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &

EB-2024-0067 Revised Transcript Stakeholder Conference, p.159-161

Preamble: EGI evidence states: *TransCanada Pipelines Limited (TCPL) – Third-Party Assignment*

- *Effective December 1, 2024, Enbridge Gas contracted for 121,142 GJ/d of incremental capacity from Niagara to the Enbridge CDA on TCPL for a 5-year term. The TCPL capacity is assigned to Enbridge Gas by a third-party for the months of December to March each year. This capacity is coupled with a supply arrangement from the third-party.*

We would like to understand better this seasonal assignment and its implications to and for the Dawn-Parkway system.

16) Does the contracted assignment come with any additional commitments?
   a) How did EGI maintain a market sensitive, reasonable and competitive price given the coupling with a supply arrangement from the third-party? Please explain fully.

b) Does the arrangement require utilization of Kirkwall to CDA capacity other than that under contract to the third-party or TCPL? Please explain.
   i) Given this arrangement, is there a reduction in M12 demand between Kirkwall & Parkway to feed the EGD/CDA?
      (1) If yes, did the contract rights for in-franchise customers and associated cost get reduced? Please show using the Dawn-Parkway right before and after the contracting.
      (2) If not, please explain fully, including provision of the last 5 years of demand for each of the EGD CDA and EDA and the specific contracts and quantities that were in place to meet Design Day Demands.

17) Please provide a schematic of the Dawn-Parkway system for the winter of 2024/25 that shows the flows and pressure on the system at the major take-offs and inter-connects assuming:
   a) That the assigned third-party contract to the CDA is <u>not</u> obligated
   b) That the assigned third-party contract to the CDA is obligated
   c) Please specify the additional Dawn to Parkway capacity that can be accommodated because of the third-party assignment.

18) For the 2024/25 winter, please provide a table showing the EGI demand sources (specific delivery areas) and quantities for gas that moves through the Dawn-Parkway to the Parkway inlet (includes gas that flows directly to EGD without going through Parkway.
   a) Please provide a second table that shows the respective contracts and facilities capacity to move gas east from the entrance to Parkway.

19) Please provide a schematic of the Dawn-Parkway system for the winter of 2024/25 that shows the flows and pressure on the system at the major take-offs and inter-connects assuming:
   a) That the assigned third-party contract to the CDA is <u>not</u> obligated
   b) That the assigned third-party contract to the CDA is obligated

Preamble: On page 42 of Appendix A in the EGI 2025-34 Asset Management Plan (AMP), EGI identifies its expectation to add 17km of NPS 48 between Kirkwall and Hamilton on the Dawn-Parkway system. We would like to understand the contemplated investments and considerations of the opportunity of IRP.

20) Please provide a reference in this evidence of the demand that supports this project.
   a) If not included in this evidence, please provide evidence defining the need to initiate this project.

b) The CAPEX from the Spend Profile shows $18M forecast to be spent in 2026. Please outline what investments are contemplated in that spend.

c) Please provide a full explanation of the steps that EGI intends to take to canvas the market to determine if entities could provide firm, obligated deliveries at Parkway as an IRP Alternative.
   i) Notwithstanding what the company may state about customers wanting to be at Dawn, please provide EGI's views on the willingness to include the opportunity for customers currently providing obligated deliveries at Dawn to shift those obligated deliveries to Parkway.

d) Please provide a full explanation of the steps that EGI intends to take to determine if entities would provide firm, obligated deliveries at Kirkwall as an IRP Alternative.
   i) Please provide a graph showing the physical flows into Kirkwall from TC Energy's Niagara line over the last three winters.
   ii) Using the average of a consecutive week of minimum flow days as a hypothetical firm supply, please provide the amount of Dawn to Parkway capacity that that amount of firm, obligated supply would provide.

REF: 2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B & EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble: We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

21) Given the cost estimates for Panhandle Regional Expansion project in EB-2022-0157, using the unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), what is the value of avoided cost of the firm deliveries at Ojibway?
   a) Please provide a summary of communications between EGI Energy Transfer Partners regarding the river crossing at Ojibway.
      i) Please provide any future plans to enhance the river crossing.

22) Please provide a map showing and identifying the interconnections of pipelines to the SIL (including all pipeline connections e.g., Vector, Bluewater, etc.).
   a) Please provide the specific receipt and delivery points of the Bluewater and St. Clair transportation contracts.
      i) If these tie into other pipelines and contracts, please describe.

b) Please provide the flow capabilities of each connection to EGI's system and/or the SIL.

c) Please provide a schematic that depicts the design day flows and pressures at the pipeline interconnection points and the system low point.
   i) Please ensure the schematic includes the HDD associated with design day, the amount of interruptible demand and whether this demand was assumed on or off for the purpose of the design day shown in the schematic.

d) Given the cost estimates for the SIL Reinforcement in EB-2019-0218, using the unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), what is the value of avoided cost of the firm deliveries at the interconnection of Vector Canada to the SIL?

e) Given the cost estimates for the SIL Reinforcement in EB-2019-0218, using the unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), what is the value of avoided cost of the firm deliveries at the interconnection of Bluewater to the SIL?

f) Please provide the most recent assessments over the last 3 years for purchasing storage at Bluewater.
   i) Can the Washington-10 storage store gas from Vector in conjunction with other contracts?

g) Would contracting for Washington-10 storage diversify EGI's storage?

h) How is the utility compensated for ex-franchise HUB services utilization of the Bluewater, Vector or other crossings?

i) Please provide the quantities of HUB services facilitated for and the payments from the non-utility storage portfolio for transport from import/export points (Vector, Ojibway, St. Clair, Bluewater, etc.)?

23) Please provide an update on EGI's open season and reverse open season for Dawn (Facilities) to Dawn (Vector).
   a) Please explain the potential benefits of this capacity to support deliveries to the Sarnia Industrial Line (possibly respond in conjunction with Question 15 for context).

24) Please provide a map showing the entire Vector, Rover and Nexus pipeline paths (including back to the field zone of Clarington or Kensington) and their interconnection near Milford Junction.
   a) Please provide the amount of available capacity from the field zone to Milford for:
      i) Rover
      ii) Nexus

   b) Please provide the amount of capacity from Milford to Dawn on Vector held by:
      i) Rover
      ii) Nexus

25) Please confirm that there is eastbound capacity from Joliet to Milford Junction.
   a) Please confirm that Vector has/is attempting to expand capacity from Rover to Joliet.
   b) Would that expansion suggest that there is a premium basis at Joliet relative to the connection of Rover and Nexus to the Vector pipeline? Please explain fully.

REF: 2025 GSP, p.45, Table 7

Preamble: We would like to understand better the options available to Planned Unutilized Capacity.

26) Please provide alternatives considered for the levels of unutilized capacity shown in Table 7.
   a) When was the last RFP and results for peaking service for each of:
      i) Union North West
      ii) Union North East

REF: 2025 GSP, p.48 & 50, Tables 9 & 10

Preamble: We would like to understand better the evolution of load balancing in EGI's GSP for 2025/26 given our concern over Table 10 showing a reduction in Annual Demand sourced at Dawn and the separation of reporting described on page 48.

27) Please provide the total capacity of Market-based Storage currently held by EGI for the winter of 2025/26.

a) Notwithstanding EGI's plan to address the Company's gas supply plan changes in the 2026 GSP Update, please provide the incremental monthly Dawn-based purchases planned for this winter to reflect the reduction in storage.

28) Please provide the rationale for the reduction in Annual Demand Sources of Supply given the economics of WCSB gas.

29) Please explain the volatility in Dawn purchases supplying the Union North East over the horizon provided.

REF: 2025 GSP, p.52, Tables 12

Preamble: We would like to understand better the Option Evaluation and its usefulness to inform the reader as well as the provision of incremental demand over the recent years.

30) What is the basis for the percentage Average Cost/Customer Impact?
a) Using the Long-haul to EGI CDA, please present the determination of approximately 3%.

31) Please provide, in tabular form, the demands in the Enbridge CDA for each year from 2020 to 2024 and any and all incremental supply contracted to meet those demands post-2020.

REF: 2025 GSP, p.58, Tables 17 & 18

Preamble: We would like to understand EGI's Supply Options better.

32) In coming to the end of the delivery areas, we noticed that the options did not provide information regarding Union WDA. Please provide the options analysis for the WDA.
a) Please provide an evaluation of using winter Short Term Firm Transport (STFT) to the WDA as part of the supply mix for peak day.
b) Please describe how EGI assesses the opportunity to use Storage Transportation Service (STS) to meet peak day requirements in the:
i) WDA
ii) NDA
iii) NCDA
iv) EDA

REF: 2025 GSP, p.84, Table 26

Preamble: We would like to understand better the increasing Unutilized Capacity for Union South in the last few years.

33) Please provide the amount of Unutilized Capacity for Union South for each of the three years prior to 2021/22.
   a) Please clarify if amounts shown are net of or include amounts of transport that were assigned to third parties to mitigate the cost of unutilized.
   b) For each of the last 6 years, please identify the quantities by pipeline that were unutilized.
   c) In an Excel spreadsheet in the following format (see below), for each year by pipeline, provide the costs associated with gas supply from that pipeline by including the incremental cost associated with the unutilized capacity.

Year	Pipeline	Amount of Commodity Delivered	Unit Cost of Landed Commodity	Amount of Unutilized Capacity	Total Cost of Unutilized Capacity	Unit Cost of Commodity including Unutilized
		(TJ)	($/GJ)	(TJ)	($)	($/GJ)

   d) Please provide a similar table for other delivery areas.

REF: 2025 GSP, Appendix D, p. 8

Preamble: ICF's Approach contains: *The objective function in the model optimizes total net economic benefit, that is, consumers' and producers' surplus minus costs. Model optimization has several constraints, equations representing physical limits of production, storage and transmission capacity and a series of "balance equations" that ensure that supply and demand are equal at each node.*

34) Please provide a forecast of the amount of capacity that may be available (through expiring contracts) of pipelines into Ontario over the next 5 years?

REF: EB-2024-0067 Revised Transcript Stakeholder Conference, p.161-171

Preamble: In the above referenced Stakeholder Conference, we were trying to obtain an understanding of how EGI arranges for its purchase of gas for the Vector pipeline while mitigating risk given the volatility and pricing in the Chicago market. We would like to ensure that the Board has clarity on EGI's practice. For the following questions, we ask that EGI confirm or clarify its approach to these transactions and provides comparison of the result with Dawn purchases.

35) Our understanding is that EGI arranges for the purchase of gas at Chicago up to a year in advance for future months initially at a Chicago index price. Please confirm or clarify.

a) At some point within the year, EGI fixes the indexed price relative to NYMEX (index plus basis between NYMEX and Chicago) for particularly volatile months like January and February. Please confirm or clarify.

b) This approach means that customers do not experience the gas prices in the cash market when future risk premiums collapse. Please confirm or clarify.

c) By locking in the basis, ratepayers are notionally buying insurance at a premium to avoid a Chicago market price spike. Please confirm or clarify.

d) That premium would be paid on all gas contracted for whether that gas makes it to Ontario or not given the company's asset management agreements. Please confirm or clarify.

REF: EB-2024-0111 Exhibit N Tab 1 Schedule 1 Page 23, Item 11

Preamble: In the above questions about the Chicago market, we have requested clarification to understand how EGI manages the price risk in the Chicago market primarily in the winter. Agreements in the above referenced items includes:

> *Among other things, Enbridge Gas will agree to consider the use of forward contracts for winter gas purchases, though it will not commit to the use of that approach.*
>
> *Enbridge Gas agrees that in total it will need to explain and justify the prudence of its load balancing costs. This will be done as part of annual deferral and variance account disposition applications*

Considering the agreements between EGI and ratepayer representatives in the above reference and our pursuit of EGI fixing the cost of gas of some of these purchases well in advance of the winter, we would like to understand better how EGI plans to manage the risks on behalf of ratepayers and evaluate the efficacy going forward. To clarify, when we state some of these purchases, we suggest that EGI could do a sensitivity analysis using historical weather to derive a minimum amount of purchased gas to support storage levels in a warm winter to allow a fixing of the price of that component.

36) Please provide EGI's views on mitigating the price risk of load balancing by fixing the price of an amount of gas determined by assessing warm winters (to mitigate the volume risk).
   a) Please provide EGI views on dividing that minimum amount across the key months of December to March.

   b) Please provide EGI's views on further dividing the amount to be fixed into certain quantities that would allow a fixing of the price at intervals 12, 9, 6 and 3 months ahead of the winter.

   c) Please describe how EGI will report on delivered gas at Dawn, which will separate:
      i) Purchases fixed in advance of the winter
      ii) Planned purchases from the Gas Supply plan which were not fixed ahead of the winter
      iii) Purchases made in response to colder than forecast weather that are deemed to be necessary to maintain targeted storage levels.

REF: EB-2023-0072 – EGI 2023 Annual Update to 5 Year GSP Responses to Written Questions & Updated Gas Supply Plan, Exhibit I.FRPO.14, Attach. 4

Preamble: In the above reference, EGI provided a comparison of the total cost of deliveries on Vector to the Dawn price available on a monthly basis. We would like to understand the actual results of the above questions regarding establishing gas price from Chicago in the last couple of years.

37) Please extend the analysis in the above reference starting November 2022 to March of 2025 while providing the total for each annual cycle & the final winter.

REF: APPENDIX I

38) Please provide a full description of how values in the table were determined including all sources of data used.