Shepherd Rubenstein

BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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Toronto, Ontario
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August 14, 2025
Our File: EB20250065

Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2025-0065 – Enbridge 5-Year Gas Supply Plan – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Enclosed, please find SEC's interrogatories in this matter.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

EB-2025-0065

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for review of its 5-Year Gas Supply Plan.

INTERROGATORIES TO

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1-SEC-1
[p.10] Please provide a copy of any internal guides, protocols, references documents, that set out Enbridge's proposed gas supply (including both commodity and transportation) processes.

1-SEC-2
Please detail all gas supply planning process, methodologies, or approach changes since the OEB considered Enbridge's previous 5-Year Gas Supply Plan, that were not subject to explicit approval as part of EB-2022-0200, EB-2024-0111, or EB-2024-0064.

1-SEC-3
[p.64] Please provide Enbridge's views on recent changes in both U.S. policy (including but not limited to trade policy) that may impact security of supply, and what, if any steps, Enbridge has or is considering taking.

2-SEC-4
[p.30] Please explain Enbridge's understanding of any natural gas transportation system expansions that would add transportation capacity to Dawn (directly or indirectly) over the next 5-years.

2-SEC-5
[p.38] Enbridge states: "For the winter 2024/25, Enbridge Gas replaced its 2% tolerance for peaking services with an amount equivalent to the statistical variation within the design day model because of the increase in design day demand from implementing the new design day methodology. Enbridge Gas used statistical validation analysis of the design day model to determine the deviation between actual and forecasted design day demand. The statistical analysis resulted in a 2.7% variation, which Enbridge Gas used as the basis for increasing reliance on peaking services to approximately 2.7% of total demand in the Enbridge CDA." Please provide further detail regarding the statistical validation analysis undertaken, and if the results included a confidential interval.

2-SEC-6
[p.80] Please provide a table that shows which specific elements of transportation and gas supply costs, impacted by the Gas Supply Plan, are considered as part of each of the application types listed in Table 22.

3-SEC-7
[p.11] With respect to the FERC review of the Vector Pipeline tolls:

a. Is Enbridge actively participating in the FERC proceeding? If not, please explain why not.
b. SEC understands that at issue in the review is Vector's cost of service. If Vector's cost of service is reduced by FERC, would the tolls it charges Enbridge be reduced?

3-SEC-8
[p.33] Please provide Figure 5 in Excel format.

4-SEC-9
[p.49] With respect to the procurement of the commodity:

a. Please explain the process of how Enbridge procures commodity and the types of terms which are often included (i.e. length of contract, pricing, etc.).
b. For the 2024/2025 year, please provide a table that includes each commodity purchased with all key information, including but not limited to, producer, point of supply, quantity, and price. Please provide the response in Excel format.

Respectfully, submitted on behalf of the School Energy Coalition this August 14, 2025

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Mark Rubenstein
Counsel for the School Energy Coalition