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August 14, 2025 **VIA E-MAIL**

Mr. Ritchie Murray
Acting Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Mr. Murray:

Re: EB-2025-0065 Enbridge Gas Inc. (EGI)
2025 5-Year Gas Supply Plan
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

Please find attached questions of VECC in the above-noted proceeding. We have also directed a copy of the same to EGI. We apologize for the delay in filing.

Yours truly,

Mark C. Garner Digitally signed by Mark C. Garner
Date: 2025.08.14 17:06:59 -04'00'

Mark Garner
Consultants for VECC/PIAC

Email copy:
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For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME	**VECC**
TO:	**Enbridge Gas Inc. (EGI)**
DATE:	**August 14, 2025**
CASE NO:	**EB-2025-0065**
APPLICATION NAME	**2025 Gas Supply Plan**

1-VECC-1

Reference – Section 1

a) Does EGI have any concerns with the OEB's Framework for the Assessment of Distributor Gas Supply Plans? If so, what changes might the Board and interested parties consider to make the process more efficient?

b) In Phase 3 of the harmonization and rebasing of rates (EB-2025-0064) EGI has proposed a number of changes to class harmonizations and rate design including the SFVD rate design. Would any of these proposals or variations of them as approved by the Board have a significant impact on gas supply planning including the forecasting of demand? Specifically, in EGI's view should the Framework be revisited subsequent to the Board's decision in EB-2025-0064?

2-VECC-2

Reference – Section 2, page 8

"*Service harmonization proposals could impact certain demand and/or supply forecasts used as inputs into the Plan. The impact of service harmonization, however, is not expected to have a material impact on asset utilization in the Plan or result in incremental Plan contracting*."

a) How does service harmonization impact demand or supply forecasts?

4-VECC-3

Reference – Section 4, page 17

"*The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system).*."

a) Please explain how the ET adjustment is made and whether the adjustment methodology changes in gas plan years (e.g. is modified based on changing government policy or other factors).

4-VECC-4

Reference – Section 4, Table 1, page 20

a) The annual demand forecast for the General Service class of customers in the Union South zone is nearly unchanged in the years 2024 through 2029 whereas the EGD Zone for this class of customers there is a marked decline of around 2.5% (i.e., 393.5 vs 384.2). Are the same forecast models used for each zone? If not, what are the differences in the models. If the same forecasting models and techniques are applied to each zone, what explains the diverging trend between these two different service zones?

4-VECC-5

Reference – Section 4, page 28

"*Enbridge Gas's preferred planning strategy is to meet design day shortfalls using third-party (peaking) services up to a maximum limit of 2% of design day demand for each delivery area. Once peaking services have been contracted to the preferred maximum by delivery area, Enbridge Gas will look to other alternatives to meet design day shortfall.*."

a) What is the relationship (if any) between design day shortfalls and the curtailment of interruptible customers? Specifically, would increasing the potential curtailment volumes have an impact on the need to contract for or call upon peaking services?

5-VECC-6

Reference – Section 5, page 43

"*However, Enbridge Gas is not able to rely upon any interruptible service(s) to provide supply to the Sarnia market on a design day and the Company does not currently have a contract for firm storage service with Bluewater Gas Storage. Therefore, the Bluewater River Crossing contract provides a back-up supply option for the Sarnia market but is not relied upon in the design of the SIL*."

a) Would contracting for Bluewater Gas Storage provide supply for the Sarnia market on a design day? If yes why is not being done?

5-VECC-7

Reference – Section 5, pages 54-

Table 14
Enbridge EDA Supply/Service Option Evaluation

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	↑	↑	→	7.97	<1%	No
Short-haul: D-P	↑	→	→	4.05	<1%	No
Short-haul: Niagara	→	→	↑	3.75	<1%	No
Short-haul: Iroquois	→	→	↑	2.70	<1%	No
Third-Party	→	↓	↑	2.02	<1%	Unknown

Table 16
Union EDA Supply/Service Option Evaluation

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	↑	↑	↑	1.16	<1%	No
Short-haul: D-P	↑	→	→	0.50	<1%	No
Short-haul: Niagara	→	→	↑	0.53	<1%	No
Short-haul: Iroquois	→	→	↑	0.39	<1%	No
Third-Party	→	↓	↑	0.28	<1%	Unknown

a) The Enbridge EDA and Union EDA appear to have virtually the same transportation supply opportunities (as Figures 8 and 9 appear to confirm). The Tables reproduced above show the evaluation to be very similar (the exception being long-haul diversity). Please explain how the transportation and supply opportunities differ in these two EDAs.

b) Why does the evaluation of “Diversity” differ as between the two CDAs (whereas all others are directional the same as is available capacity.

c) Are any (or all) sales commodity or transportation contracts for these two EDAs the same and allocated to the specific EDA based on demands?

6-VECC-8

Reference – Section 6, page 43, EB-2024-0111 Decision and Order May 29, 2025

a) Does the Board’s recent decision with respect to the LCVP have any material impact on the current gas supply plan?

10-VECC-9

Reference – Section 10, Table 23, page 81 / Appendix E, page 1 0f 3

Table 23
Actual vs. Plan Annual HDDs (1)

Line No.	Particulars	2021/22 Actual	2021/22 Plan	2021/22 Variance (2)	2022/23 Actual	2022/23 Plan	2022/23 Variance (2)	2023/24 Actual	2023/24 Plan	2023/24 Variance (2)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Weather Zone									
1	Central	3,607	3,634	-0.7%	3,265	3,566	-8%	3,055	3,560	-14%
2	East	4,428	4,343	2.0%	3,895	4,299	-9%	3,778	4,338	-13%
3	West	3,408	3,419	-0.3%	3,121	3,398	-8%	2,901	3,398	-15%
4	South	3,744	3,757	-0.3%	3,409	3,704	-8%	3,181	3,781	-16%
5	North	4,988	4,950	0.8%	4,545	4,877	-7%	4,046	4,673	-13%

a) Actual HDD results would appear to show a systemic bias in that warmer than forecast temperatures have been occurring since 2022 and the variance in under forecasting temperature has been increasing. Such results might be consistent with a (global) warming trend were historical values are less indicative of future ones. What changes (if any) is EGI undertaking to test whether its HDD modeling continues to be a good indicator of future trends?

b) How did EGI determine the Target Variance range for HDD variances? Why are the ranges different from the various rate zones?

END OF DOCUMENT