

Mr. Ritchie Murray Acting Registrar Ontario Energy Board P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4

September 18, 2025

EB-2025-0163 Enbridge 2026 Rates Application Pollution Probe Interrogatories

Dear Mr. Murray:

In accordance with OEB direction, please find attached Pollution Probe's interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA

Michael Brophy Consulting Inc. Consultant to Pollution Probe

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Cc: Enbridge Regulatory (via email)

David Stevens, Aird & Berlis LLP (via email)

All Parties (via email)

Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

Enbridge Gas Inc. 2026 Rates Application

POLLUTION PROBE INTERROGATORIES

September 18, 2025

Submitted by: Michael Brophy

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28 Macnaughton Road

Toronto, Ontario M4G 3H4

Consultant for Pollution Prob

PP-1

Reference: In this Application, Enbridge Gas seeks approval of interim distribution rates for each rate zone for the year commencing January 1, 2026, including all adjustments resulting from the application of Enbridge Gas's OEB-approved IRM rate adjustment.

- a) Please indicate what components of the 2026 rate application are for interim rate approval and which components relate to final rate approval.
- b) For each component where interim rates are requested, please indicate why and when Enbridge proposes to apply for final 2026 rates.

PP-2

- a) If the OEB approves Enbridge's requests in its EB-2025-0064 application, please indicate that what adjustments would need to occur to 2026 rates compared to what is in this 2026 rates application.
- b) If the OEB rejects Enbridge's requests in its EB-2025-0064 application, please indicate that what adjustments would need to occur to 2026 rates compared to what is in this 2026 rates application.

PP-3

Reference: The base rate adjustment for expensing capitalized overheads is provided at Exhibit C, Tab 1, Rate Order, Working Papers, Schedule 8.

- a) Please explain how the total capital deduction amount in part a (above) matches the capital overhead reduction amount required by the OEB.
- b) Enbridge identifies the reduction in capitalized overheads for 2026 as equivalent to \$51,963,000 for 2026. Please explain if Enbridge is requesting approval for \$51,963,000 of incremental O&M or if this amount is already contained within the O&M envelope previously approved for the 2025 to 2028 term.

PP-4

Reference: Enbridge Gas does not view the 2024 Rebasing Phase 1 approved capital budget as a hard cap for each year of the IR term, but it does serve as a base for capital planning/optimization purposes. Customer and business needs, as reflected annually in the updated AMP, will dictate the level of capital spending in each of 2025 to 2028. In addition, the migration of overhead capitalization, as ordered by the OEB in the 2024 Rebasing Phase 1 Decision, will also impact annual capital expenditure levels. [EB-2025-0064 Exhibit I.2.5-PP-35a]

- a) Enbridge indicates that it believes it can make further adjustment to allocation of capital in 2025 to 2028 term, which includes 2026. Please provide details on all conditions in place that would allow or restrict Enbridge from making 2026 capital plan adjustments outside existing OEB direction and what is included in this 2026 rate application for OEB approval.
- b) If Enbridge decides to overspend capital in 2026 above that which has been OEB approved for the term, please explain what mechanisms Enbridge could use to recover those incremental capital expenditures.
- c) Is Enbridge requesting flexibility to make changes for 2026 to the way it actually allocates the \$50 million of overhead capital to O&M, or would it be mandatory to allocate those costs exactly in the manner outlined in this application (or as adjusted by the OEB in its pending Decision for this proceeding)?