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VIA RESS and EMAIL

October 2, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ritchie Murray:

**Re: EB-2025-0065 – Enbridge Gas Inc. (Enbridge Gas)
5-Year Gas Supply Plan – Technical Conference Undertaking Responses**

In accordance with the OEB's Procedural Order No. 1 dated July 9, 2025, enclosed please find the Technical Conference Undertaking Responses of Enbridge Gas.

There is now a full record upon which a decision can be made for all items on the Issues List. Enbridge Gas submits that there is no need for a further oral hearing process. Enbridge Gas further submits that the appropriate next step for this adjudicated process is to move to written submissions.

Enbridge Gas's evidentiary filing addresses all the matters covered by the Issues List. The Company is not aware of what specific points of disagreement or concern may be raised by other parties in relation to any of the listed issues. With these things in mind, it is not clear what benefit would be served by Enbridge Gas preparing and filing an Argument in Chief. Enbridge Gas submits that the most efficient process would be for OEB staff and intervenors to file written submissions setting out their positions on the 5-Year Gas Supply Plan and the Issues List, and then for Enbridge Gas to file Reply Submissions. That approach would be substantially similar to what has been in place for the first OEB review of the Company's 5-Year Gas Supply Plan (EB-2019-0137), as well as each of the subsequent Annual Update proceedings (most recently the 2024 Annual Update in EB-2024-0067).

Should you have any questions on this matter please contact the undersigned.

Sincerely,

Richard Wathy
Technical Manager, Regulatory Applications

cc: David Stevens, Aird & Berlis LLP
EB-2025-0065 - Intervenors

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 24

To provide a further version of the table at Exhibit I.2-CCC-4, Attachment 1, where Enbridge sets out the supply, transportation and storage costs that are included in lines 1, 2 and 8 of that table, and explain what is included under each of those three components

Response:

Please see Attachment 1. Enbridge Gas's gas supply portfolio costs include total commodity, transportation and storage costs. Commodity costs include the cost of natural gas purchased from various supply basins. Transportation costs include upstream transportation tolls required to transport natural gas from the supply basin/purchase point to the market area (and to/from storage, if applicable). Storage costs include the cost of market-based storage and related inventory carrying costs. Cost-based storage costs are included in the Company's utility revenue requirement and not included in gas supply portfolio costs as they are a fixed utility cost that does not change among gas supply plan alternatives.

Enbridge CDA - Alternative Cost Summary by Year

Line No.	Alternative Number	Particulars (\$million)	2024/25 (a)	2025/26 (b)	2026/27 (c)	2027/28 (d)	2028/29 (e)	Total (f)=sum(a:e)	Alternative Cost Variance to Base Case (1) (g)	Alternative Cost Variance to Lowest Cost Alternative (Alt 1) (2) (h)
<u>Base Case</u>										
1	-	Total Commodity Cost	1,203.9	1,395.5	1,457.1	1,457.1	1,443.0	6,956.6		
2		Total Transportation Cost	479.6	479.6	479.6	479.6	479.6	2,398.0		
3		Storage Cost	34.0	39.6	40.5	40.6	40.7	195.4		
4		Total Base Case	1,717.5	1,914.7	1,977.2	1,977.3	1,963.3	9,550.0	-	N/A
<u>Long-haul</u>										
5	1	2024 TCPL ECOS - Empress to Enbridge CDA								
		Commodity Cost	1,175.2	1,369.7	1,427.5	1,426.6	1,417.7	6,816.7	(139.9)	-
6		Transportation Cost	512.5	512.5	512.5	512.5	512.5	2,562.5	164.5	-
7		Storage Cost	33.2	39.5	40.5	40.5	40.8	194.5	(0.9)	-
8		Total	1,720.9	1,921.7	1,980.5	1,979.6	1,971.0	9,573.7	23.7	-
<u>Third-Party TCPL Assignment Scenarios</u>										
9	2	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)								
		Commodity Cost	1,208.3	1,401.9	1,463.8	1,463.8	1,449.6	6,987.4	30.8	170.7
10		Transportation Cost	479.6	479.6	479.6	479.6	479.6	2,398.0	0.0	(164.5)
11		Storage Cost	33.7	39.8	40.6	40.8	41.1	196.0	0.6	1.5
12		Total	1,721.6	1,921.3	1,984.0	1,984.2	1,970.3	9,581.4	31.4	7.7
13	3	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 2)								
		Commodity Cost	1,210.2	1,402.8	1,464.9	1,464.9	1,450.7	6,993.5	36.9	176.8
14		Transportation Cost	479.6	479.6	479.6	479.6	479.6	2,398.0	0.0	(164.5)
15		Storage Cost	33.7	39.8	40.6	40.7	41.0	195.8	0.4	1.3
16		Total	1,723.5	1,922.2	1,985.1	1,985.2	1,971.3	9,587.3	37.3	13.6
17	4	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 3)								
		Commodity Cost	1,211.3	1,403.4	1,465.0	1,465.3	1,451.0	6,996.0	39.4	179.3
18		Transportation Cost	479.6	479.6	479.6	479.6	479.6	2,398.0	0.0	(164.5)
19		Storage Cost	33.9	39.7	40.5	40.6	40.8	195.5	0.1	1.0
20		Total	1,724.8	1,922.7	1,985.1	1,985.5	1,971.4	9,589.5	39.5	15.8
<u>Combination of Long-haul and Third-Party Assignment</u>										
21	5	20,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus								
		64,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)								
		Commodity Cost	1,200.3	1,394.0	1,454.9	1,454.7	1,441.5	6,945.4	(11.2)	128.7
22		Transportation Cost	487.3	487.3	487.3	487.3	487.3	2,436.5	38.5	(126.0)
23		Storage Cost	33.3	39.6	40.6	40.6	41.1	195.2	(0.2)	0.7
24		Total	1,720.9	1,920.9	1,982.8	1,982.6	1,969.9	9,577.1	27.1	3.4
25	6	40,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus								
		44,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)								
		Commodity Cost	1,191.8	1,386.0	1,446.1	1,445.4	1,433.4	6,902.7	(53.9)	86.0
26		Transportation Cost	495.1	495.1	495.1	495.1	495.1	2,475.5	77.5	(87.0)
27		Storage Cost	33.6	39.8	40.7	40.8	41.2	196.1	0.7	1.6
28		Total	1,720.5	1,920.9	1,981.9	1,981.3	1,969.7	9,574.3	24.3	0.6

Notes:

- (1) Calculated as the total cost of alternative (column (f)) less total cost of base case (lines 1-4, column (f)).
(2) Calculated as the total cost of alternative (column (f)) less total cost of alternative 1 (lines 5-8, column (f)).

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 37

To fill out the missing information in KT-1.1 for rows 1 to 4.

Response:

Please see Attachment 1 for the Estimated 2024/25 Average Day Delivered Cost to each of the Enbridge EDA, Union EDA, Union NDA, and Union WDA, in the format requested by FRPO provided at Exhibit KT1.1.

Enbridge Gas notes the supply cost in Attachment 1 is calculated based on an average five-year forecast¹ of gas supply commodity pricing (as of October 2024), as provided by ICF International as part of its Q2 2024 Base Case.²

¹ Five-year forecast from November 1, 2024 to October 31, 2029.

² Consistent with the Company's Average Day Supply/Service Option Analysis set out in the Gas Supply Plan at Section 5.7, Table 20, and as described by Enbridge Gas during Day 1 of the Technical Conference (Tr. Vol 1, p.36).

Table 1 - Estimated 2024/25 Average Day Delivered Cost to Enbridge EDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Enbridge EDA	\$2.43	\$3.11	\$1.04	N/A	\$0.14	\$4.29	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Enbridge EDA	\$3.24	\$4.14	\$0.49	\$0.00	\$0.06	\$4.69	M12 + TCPL FT SH
TCPL: Short-haul via Niagara	Niagara	Enbridge EDA	\$2.89	\$3.70	\$0.47	N/A	\$0.04	\$4.21	TCPL FT SH
TCPL: Short-haul via Iroquois	Iroquois	Enbridge EDA	\$3.49	\$4.47	\$0.16	N/A	\$0.01	\$4.64	TCPL FT SH

Table 2 - Estimated 2024/25 Average Day Delivered Cost to Union EDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union EDA	\$2.43	\$3.11	\$1.10	N/A	\$0.14	\$4.35	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union EDA	\$3.24	\$4.14	\$0.42	\$0.00	\$0.05	\$4.62	M12 + TCPL FT SH
TCPL: Short-haul via Niagara	Niagara	Union EDA	\$2.89	\$3.70	\$0.47	N/A	\$0.03	\$4.21	TCPL FT SH
TCPL: Short-haul via Iroquois	Iroquois	Union EDA	\$3.49	\$4.47	\$0.17	N/A	\$0.01	\$4.65	TCPL FT SH

Table 3 - Estimated 2024/25 Average Day Delivered Cost to Union NDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union NDA	\$2.43	\$3.11	\$0.67	N/A	\$0.11	\$3.89	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union NDA	\$3.24	\$4.14	\$0.51	\$0.00	\$0.06	\$4.71	M12 + TCPL FT SH
LNG	Dawn	Union NDA	\$3.24	\$4.14	N/A	\$1.14	N/A	\$5.28	LNG

Table 4 - Estimated 2024/25 Average Day Delivered Cost to Union WDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union WDA	\$2.43	\$3.11	\$0.40	N/A	\$0.03	\$3.54	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union WDA	\$3.24	\$4.14	\$1.00	\$0.00	\$0.03	\$5.18	M12 + TCPL FT SH
GL: Michcon to WDA	SE Michigan	Union WDA	\$3.15	\$4.03	\$0.52	\$0.02	\$0.07	\$4.65	GL FT

Sources:

Gas Supply Prices: ICF Q2 2024 Base Case - November 2024 to October 2029
Fuel Ratios: Average ratio over the previous 12 months or Pipeline Forecast
Transportation Tolls : Tolls in effect on Alternative Routes at the time of Analysis
Foreign Exchange: \$1 US = \$1.3504 CDN From Bank of Canada Closing Rate October 1, 2024
Energy Conversions: 1 dth = 1 mmBtu = 1.055056
Toll and Fuel Effective Date: October 1, 2024

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 40

To provide an alternate view of Exhibit KT-1.1, rows 1 to 4, setting out the cost per GJ of the missing cells for the average of the four coldest days of the last two years.

Response:

Please see Attachment 1 for the Estimated 2024/25 Design Day Delivered Cost to each of the Enbridge EDA, Union EDA, Union NDA, and Union WDA, in the format requested by FRPO provided at Exhibit KT1.1 and based on the average of the four highest spot prices that occurred in each of the last two winter seasons (2022/23 and 2023/24).

During Day 1 of the Technical Conference¹, FRPO stated:

D. QUINN: Well, I would say, okay, do four days of supply -- sorry. I'd like this -- you to fill this table, and then we can talk about a second table that uses four-day supply for the coldest weather or the coldest days or prices in the last two years. You have done three years because that brings in the anomaly of 2022, and to me, that is cherry-picking the supply cost. So, I am asking for two years for that.

Enbridge Gas disagrees with FRPO's allegation of cherry-picking supply cost. In fact, Enbridge Gas has consistently calculated and presented the results of its design day analysis using three years of historical pricing data from Platts to calculate the average of the ten highest spot prices that occurred in each of the respective winter seasons (in this instance, 30 data points from 2021/22, 2022/23, and 2023/24).² Deviating from this established methodology, as proposed by FRPO (to include only 20 data points from 2022/23, and 2023/24) is not appropriate as it intentionally weights the results on a smaller sample of two winter seasons (2022/23 and 2023/24) wherein warmer than expected temperatures (and lower HDDs) were experienced across Ontario and much of North America (as discussed in Section 10 of the Company's pre-filed evidence). Whereas both the preceding and subsequent winter seasons (2021/22 and 2024/25) were colder and closer to planned temperatures and HDDs.

¹ Tr. Vol 1, pp.34-35.

² Tr. Vol 1, p.6.

Further, Enbridge Gas considers the results of its design day analysis to be adequately conservative considering that none of the spot prices collected to calculate the three-year average highest gas supply prices occurred on an actual design day for any delivery area. Enbridge Gas expects that should an actual design day occur, market prices for gas supply would spike in accordance with demands, driving these costs higher yet (e.g., at Iroquois where prices have traded as high as \$83.63 USD/MMBtu in the winter of 2022/23 and \$34.44 USD/MMBtu in the winter of 2024/25).³

³ Exhibit I.2-CCC-4, part a); Exhibit I.5-EP-2.

Table 1 - Estimated 2024/25 Design Day Delivered Cost to Enbridge EDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Enbridge EDA	\$11.76	\$15.05	\$1.04	N/A	\$0.65	\$16.74	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Enbridge EDA	\$6.31	\$8.08	\$0.49	\$0.00	\$0.11	\$8.68	M12 + TCPL FT SH
TCPL: Short-haul via Niagara	Niagara	Enbridge EDA	\$6.74	\$8.63	\$0.47	N/A	\$0.08	\$9.18	TCPL FT SH
TCPL: Short-haul via Iroquois	Iroquois	Enbridge EDA	\$15.36	\$19.66	\$0.16	N/A	\$0.05	\$19.87	TCPL FT SH

Table 2 - Estimated 2024/25 Design Day Delivered Cost to Union EDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union EDA	\$11.76	\$15.05	\$1.10	N/A	\$0.67	\$16.81	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union EDA	\$6.31	\$8.08	\$0.42	\$0.00	\$0.09	\$8.60	M12 + TCPL FT SH
TCPL: Short-haul via Niagara	Niagara	Union EDA	\$6.74	\$8.63	\$0.47	N/A	\$0.08	\$9.18	TCPL FT SH
TCPL: Short-haul via Iroquois	Iroquois	Union EDA	\$15.36	\$19.66	\$0.17	N/A	\$0.06	\$19.90	TCPL FT SH

Table 3 - Estimated 2024/25 Design Day Delivered Cost to Union NDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union NDA	\$11.76	\$15.05	\$0.67	N/A	\$0.54	\$16.26	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union NDA	\$6.31	\$8.08	\$0.51	\$0.00	\$0.11	\$8.71	M12 + TCPL FT SH
LNG	Dawn	Union NDA	\$3.24	\$4.14	N/A	\$1.14	N/A	\$5.28	LNG

Table 4 - Estimated 2024/25 Design Day Delivered Cost to Union WDA

Route	Point of Supply/Receipt	Point of Delivery	Supply Cost at Point of Receipt USD/MMBtu	Supply Cost at Point of Receipt CAD/GJ	Unitized Demand Charge CAD/GJ	Commodity Charge CAD/GJ	Fuel Charge CAD/GJ	Total Delivered Cost CAD/GJ	Design Demand Cost to Delivery Area
TCPL: Long-haul	Empress	Union WDA	\$11.76	\$15.05	\$0.40	N/A	\$0.12	\$15.57	TCPL FT LH
TCPL: Short-haul via Dawn to Parkway	Dawn	Union WDA	\$6.31	\$8.08	\$1.00	\$0.00	\$0.07	\$9.15	M12 + TCPL FT SH
GL: Michcon to WDA	SE Michigan	Union WDA	\$4.77	\$6.10	\$0.52	\$0.02	\$0.11	\$6.75	GL FT

Sources:

Gas Supply Prices:

Fuel Ratios:

Transportation Tolls :

Foreign Exchange:

Energy Conversions:

Toll and Fuel Effective Date:

S&P Global Commodity Insights, ©2025 by S&P Global Inc.

Average ratio over the previous 12 months or Pipeline Forecast

Tolls in effect on Alternative Routes at the time of Analysis

\$1 US =

1 dth = 1 mmBtu =

October 1, 2024

From Bank of Canada Closing Rate October 1, 2024

\$1.3504 CDN

1.055056

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 41

To include the EDA, WDA, and NDA when answering JT-1.2 and JT-1.3.

Response:

Please see response at Exhibit JT1.2, Attachment 1, Tables 2-4, and Exhibit JT1.3, Attachment 1, Tables 2-4.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 51

To provide the calculation that was used to determine the design day for the CDA for 2023/2024 and 2024/2025.

Response:

Please see Attachment 1 for the calculation of the 2023/24 design day demands for the Enbridge CDA and Enbridge EDA as provided in the 2024 Annual Update¹. The 2023/24 design day demands were calculated using EGD's previously approved probabilistic method, which applies weather conditions based on a one-in-five-year recurrence level. The process used to determine the 2023/24 Enbridge CDA/ EDA design day demand is outlined in the 2019 5-Year Gas Supply Plan².

Please see Attachment 2 for the calculation of the 2024/25 design day demands for the Enbridge CDA. The calculation of the 2024/25 design day demands for the Enbridge EDA were provided in response at Exhibit I.2-FRPO-10. The 2024/25 design day demands were calculated using Enbridge Gas's updated set temperature methodology that was approved during the 2024 Rebasing Phase 1 Settlement Agreement^{3,4}. The process used to determine the 2024/25 Enbridge CDA/EDA design day demands is summarized in Phase 1 of 2024 Rebasing⁵.

Please see response provided at Exhibit I.2-FRPO-11 for a summary of the other factors that contribute to the differences between the design day demands provided within the 2024 Annual Update⁶ and within this 5-Year Gas Supply Plan.

Table 1 below shows the design day Heating Degree Day (HDD) and temperature for Enbridge EDA and CDA, comparing both the previous and updated design day HDD methodologies and the resulting design day demands for each year, respectively.

¹ EB-2024-0067.

² EB-2019-0137, p.34-38.

³ EB-2022-0200, Settlement Agreement, August 17, 2023.

⁴ Set Temperature Method, as described in EB-2022-0200, Exhibit 4, Tab, 2 Schedule 3.

⁵ EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51.

⁶ EB-2024-0067.

Note that the design day HDDs used to determine design day demands for 2023/24 used a base temperature of 18°C, whereas the design day HDDs used to determine design day demands for 2024/25 have a base temperature of 15°C.

Table 1
Comparison of 2023/24 and 2024/25
Heating Degree Day (HDD) and Design Day Demand

Line No.		2023/24 Forecast (EB-2024-0067)		2024/25 Forecast (EB-2025-0065)	
		Design HDD _w (°C) ⁷	Demand (TJ/d)	Design HDD _w (°C) ⁸	Demand (TJ/d)
		(a)	(b)	(c)	(d)
1	CDA-Niagara ⁹	38.8 (-20.8)	3,378	37.8 (-22.8)	3,578
2	CDA-Central ¹⁰	41.4 (-23.4)		41.4 (-26.4)	
3	EDA	48.2 (-30.2)	723	47.5 (-32.5)	723

⁷Determined using probabilistic method, 1-in-5 recurrence interval, using 18°C as the base temperature to convert between HDD and temperature.

⁸ Current approved weather methodology using coldest temperature since 1993/1994, using 15°C as the base temperature to convert between HDD and windspeed compensated temperature per EB-2022-0200, Settlement Agreement, August 17, 2023.

⁹ CDA-Niagara and CDA-Central together make up Enbridge CDA.

¹⁰ Ibid.

Calculation of 2023/24 Design Day Demand - Enbridge CDA and Enbridge EDA

Line No.	Description	Coefficient	Inputs	Natural Logarithm	Comment
	(a)	(b)	(c)	(d)	(e)
<u>Enbridge CDA</u>					
<u>Central</u>					
Variables:					
1	Constant	6.30		6.30	Column (d) = Column (b)
2	HDD	0.45	41.40	1.67	Column (d) = Column (b) * natural logarithm of Column (c)
3	Previous day HDD	0.23	34.70	0.82	Column (d) = Column (b) * natural logarithm of Column (c)
4	Wind speed	0.07	22.50	0.23	Column (d) = Column (b) * natural logarithm of Column (c)
5	Customer count (unlocks)	0.41	1,741,445	5.92	Column (d) = Column (b) * natural logarithm of Column (c)
6	Subtotal			14.94	Sum of Lines 1 to 5
7	Weekday? (yes = 1)	0.04	1	0.04	
8	Total			14.98	Line 6 + Line 7
9	Design Day Demand (GJ)			3,193,219	Exponential of Line 8
<u>Niagara</u>					
Variables:					
10	Constant	9.93		9.93	Column (d) = Column (b)
11	HDD	0.56	38.80	2.04	Column (d) = Column (b) * natural logarithm of Column (c)
12	Previous day HDD	0.07	32.60	0.24	Column (d) = Column (b) * natural logarithm of Column (c)
13	Wind speed	0.11	24.30	0.34	Column (d) = Column (b) * natural logarithm of Column (c)
14	Time	(0.04)	28	(0.12)	Column (d) = Column (b) * natural logarithm of Column (c)
15	Subtotal			12.42	Sum of Lines 10 to 14
16	Weekday? (yes = 1)	0.03	1	0.03	
17	Total			12.45	Line 15 + Line 16
18	Design Day Demand (GJ)			255,854	Exponential of Line 17
19	Total Enbridge CDA Design Day Demand, excluding curtailment			3,449,073	Line 9 + Line 18
20	Less: Curtailment Demand			70,751	
21	Total Enbridge CDA Design Day Demand			<u>3,378,322</u>	Line 19 - Line 20
<u>Enbridge EDA</u>					
Variables:					
22	Constant	4.02		4.02	Column (d) = Column (b)
23	HDD	0.75	48.20	2.90	Column (d) = Column (b) * natural logarithm of Column (c)
24	Previous day HDD	0.23	41.10	0.84	Column (d) = Column (b) * natural logarithm of Column (c)
25	Wind speed	0.08	19.10	0.23	Column (d) = Column (b) * natural logarithm of Column (c)
26	Customer count (unlocks)	0.43	398,218	5.52	Column (d) = Column (b) * natural logarithm of Column (c)
27	Subtotal			13.49	Sum of Lines 22 to 26
28	Weekday? (yes = 1)	0.03	1	0.03	
29	Total			13.53	Line 27 + Line 28
30	Total Enbridge EDA Design Day Demand, excluding curtailment			748,416	Exponential of Line 29
31	Less: Curtailment Demand			25,858	
32	Total Enbridge EDA Design Day Demand			<u>722,558</u>	Line 30 - Line 31

CDA 2024/25 Design Day Demand Development

Line No.	Description	CDA-Central Demand (GJ/d)	CDA-Niagara Demand (GJ/d)	Comments
	(a)	(b)	(c)	(d)
<u>Base Demand Calculation</u>				
1	Total ¹ Base Demand ² from Winter 2023/24 actual ³	3,380,311	294,710	
2	Total ⁴ Contract Base Demand ⁵ from Winter 2023/24 actual ⁶	305,842	37,307	
3	General Service Base Demand	3,074,469	257,403	Line 1 minus Line 2
<u>General Service Demand Calculation</u>				
4	General Service Base Demand	3,074,469	257,403	Restate Line 3
5	Use Per Customer Factor ⁷ (UPCF)	0.997	0.976	Use Delivery Area Specific UPCF
6	General Service Base Demand with UPCF Adjustment	3,065,456	251,313	Line 4 multiplied by Line 5
7	Declining Use Per Customer Factor ⁸ (dUPCF)	0.996	0.996	Use Winter 2024/25 dUPCF
8	General Service Base Demand with dUPCF Adjustment	3,052,645	250,263	Line 6 multiplied by Line 5
9	W2024/25 Egress Volume ⁹	-2482	-198	
10	W2024/25 General Service Growth Volume ¹⁰	21,321	2,751	
11	W2024/25 Total Forecast General Service Demand	3,071,484	252,815	Summation of Lines 8, 9, and 10
<u>Contract Rate Demand Calculation</u>				
12	Total Contract Base Demand	305,842	37,307	Restate Line 2
13	Firm ¹¹ Contract Rate Demand ¹²	226,240	29,866	
14	Interruptible ¹³ Contract Rate Demand ¹⁴	79,603	7,441	Line 12 minus Line 13
15	W2024/25 Firm Contract Demand Forecast Volume ¹⁵	-3989	1913	
16	W2024/25 Interruptible Contract Demand Forecast Volume ¹⁶	0	0	
17	W2024/25 Total Firm Forecast Contract Rate Demand	222,251	31,780	Line 13 plus Line 15
18	W2024/25 Total Interruptible Forecast Contract Rate Demand	79,603	7,441	Line 14 plus Line 16
<u>Total Design Day Demand Calculation</u>				
19	W2024/25 Total Forecast General Service Demand	3,071,484	252,815	Restate Line 11
20	W2024/25 Total Firm Forecast Contract Demand	222,251	31,780	Restate Line 17
21	Total Design Day Demand ¹⁷	3,293,735	284,595	Line 19 plus Line 20
22	CDA Total Design Day Demand	3,578,329		Line 21(b) plus Line 21(c)

Notes:

- [1] Derived from the linear regression analysis of the total volumetric demand from city gate station measurement data and weather data in the form of HDDw as stated in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, a-f).
- [2] The daily demand used in the Enbridge CDA delivery area linear regression analysis are obtained from daily measurement records from the relevant city gate stations (TCPL tap locations).
- [3] The linear regression analysis for CDA-Central and CDA-Niagara uses Toronto Design Day HDDw of 41.4 and St.Catharines Design Day HDDw of 37.8, respectively, with 15°C base temperature
- [4] Firm and interruptible demand.
- [5] The daily demand used in the CDA delivery area linear regression for contract customers are obtained from the customers station measurement records for contract rate customers within the Enbridge CDA as stated in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, a)-f), h-i-iii).
- [6] The linear regression analysis for CDA-Central and CDA-Niagara uses Toronto Design Day HDDw of 41.4 and St.Catharines Design Day HDDw of 37.8, respectively, with 15°C base temperature
- [7] The use per customer factor is as stated at EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, g iii) and EB-2025-0065, p.23.
- [8] The declining use per customer factor is as stated at EB-2020-0091, 2025-2034 Asset Management Plan Addendum, Section 4.5.
- [9] EB-2025-0065, p.17.
- [10] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).
- [11] For contract rate customers with both firm and interruptible demand, firm demand will be assigned based on customers firm Contract Demand per their contract. Interruptible demand will be any remaining demand above the firm Contract Demand.
- [12] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, h-i-iii).
- [13] For contract rate customers with both firm and interruptible demand, firm demand will be assigned based on customers firm Contract Demand per their contract. Interruptible demand will be any remaining demand above the firm Contract Demand.
- [14] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, h-i-iv).
- [15] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).
- [16] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).
- [17] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, EB-2025-0065, p.25.
- [18] Interruptible Contract Rate Demand is not included in the Total Design Day Demand.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 57

To provide the comparison/analysis from the 2023/2024 design day demand to the 2024/2025 design day demand for the EDA specifically.

Response:

Please see response at Exhibit JT1.5.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 66

To advise what would be the impact on forecast dawn purchases for the 2025/2026 winter, or how would the forecast dawn winter purchases change if the assumption was that HDDS would be 10 percent more or 10 percent less.

Response:

A 10% increase/decrease in heating degree days (HDDs) would increase/decrease forecast 2025/26 winter Dawn purchases of 64 PJ¹ by 26 PJ² to 90 PJ and 38 PJ respectively.

¹ 44 PJ for the EGD rate zone and 20 PJ for the Union rate zones.

² 17 PJ for the EGD rate zone and 9 PJ for the Union rate zones.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 69

To provide an indicative view of the minimum amount of dawn purchases that it would require for the 2025/2026 year, assuming that weather was the warmest that could be reasonably expected.

Response:

Through review of the transcript¹, Enbridge Gas has responded to this Undertaking referencing 2025/26 winter Dawn purchases.

Enbridge Gas has recalculated its demand forecast and gas supply plan using actual HDDs from 2024², with 2024 having had the lowest HDDs in recent history. The lower HDDs would decrease forecast 2025/26 winter Dawn purchases of 64 PJ³ by 35 PJ⁴ to 29 PJ.

¹ Tr. Vol. 1, p.68, lines 21 to 27.

² Enbridge Gas used 2024 calendar year HDD data to recalculate its gas supply plan for the warmest weather on record. If the 2023/24 gas year HDD data was used, total annual demand would be approximately 0.7% lower which equates to an additional reduction in Dawn purchases of approximately 0.7 PJ.

³ 44 PJ for the EGD rate zone and 20 PJ for the Union rate zones.

⁴ 24 PJ for the EGD rate zone and 11 PJ for the Union rate zones.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 75

To provide a scenario where it sets out the minimum amount of winter purchases for 2025/2026 being purchased in fixed price tranches at intervals that are 12, 9, 6, and 3 months ahead of the winter, and indicate the fixed pricing using cgpr or similar publicly available data.

Response:

Please see Table 1 for a summary of Estimated Winter 2025/26 Costs of Fixed Price Dawn Purchases using historical forward prices for the 2025/26 winter season assuming procurement in equal quarterly tranches at fixed prices as specified by FRPO (12, 9, 6, and 3 months in advance of that season). Table 1 also assumes procurement of the minimum Dawn purchase volumes described in response at Exhibit JT1.8 (winter 2024/25 season), commencing November 1, 2024 (consistent with the Company's Gas Supply Plan and procurement plan as discussed in Section 8.1).

Table 1
Estimated Winter 2025/26 Costs of Fixed Price Dawn Purchases

Line No.	Price Date	Dec '25 – Mar '26 Avg. Dawn Forward Price (USD/MMBtu)	Dec '25 – Mar '26 Avg. Dawn Forward Price (CAD/GJ)	Nov '24 – Mar '25 Min. Dawn Purchases (1) (GJ)	Dec '25 – Mar '26 Avg. Dawn Purchase Cost (CAD)
	(a)	(b)	(c)	(d)	(e)
1	1-Nov-24	\$3.544	\$4.536	7,250,000	\$32,884,254
2	1-Feb-25	\$3.852	\$4.931	7,250,000	\$35,746,983
3	1-May-25	\$4.246	\$5.434	7,250,000	\$39,398,469
4	1-Aug-25	\$3.915	\$5.011	7,250,000	\$36,326,952
5	Total			29,000,000	\$144,356,657
6	Average	\$3.889	\$4.978		\$36,089,164

Note:

(1) Per Exhibit JT1.8.

Sources:

CME for NYMEX forward prices.

Kiodex for Dawn basis forward prices.

Sources used consistent with forward pricing used for the Company's QRAM filings.

Foreign Exchange \$1 USD = \$1.3504 (Bank of Canada Closing Rate October 1, 2024)

Energy Conversions: 1 dth = 1 MMBtu = 1.055056

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 78

To indicate the fixed price contract amounts at 12, 9, 6, and 3-month intervals ahead of the winter using the data relevant to the 2024/2025 winter

Response:

Please see Table 1 for a summary of Estimated Winter 2024/25 Costs of Fixed Price Dawn Purchases using historical forward prices for the winter 2024/25 season assuming procurement in equal quarterly tranches at fixed prices as specified by FRPO (12, 9, 6, and 3 months in advance of that season). Table 1 also assumes procurement of the minimum Dawn purchase volumes described in the response at Exhibit JT1.8 (winter 2024/25 season), commencing November 1, 2023 (consistent with the Company's Gas Supply Plan and procurement plan as discussed in Section 8.1).

By comparison, at \$3.393 USD/MMBtu (\$4.343 CAD/GJ) the actual average cost for Dawn purchases incurred by Enbridge Gas for the winter 2024/25 season was slightly lower than the average costs of fixed price purchases estimated in Table 1 of \$3.403 USD/MMBtu (\$4.356 CAD/GJ). Enbridge Gas procured actual Dawn volumes using its current procurement practices, including more than 100 total transactions for a combination of seasonal, monthly, and short-term deliveries, transacted between August 2024 and February 2025. Seasonal and monthly prompt purchases were made using index prices (NYMEX + Dawn Basis), whereas short-term purchases were made using fixed prices.

Table 1
Estimated Winter 2024/25 Costs of Fixed Price Dawn Purchases

Line No.	Price Date	Dec '24 – Mar '25 Avg. Dawn Forward Price (USD/MMBtu)	Dec '24 – Mar '25 Avg. Dawn Forward Price (CAD/GJ)	Nov '24 – Mar '25 Min. Dawn Purchases (1) (GJ)	Dec '24 – Mar '25 Avg. Dawn Purchase Cost (CAD)
	(a)	(b)	(c)	(d)	(e)
1	1-Nov-23	\$4.128	\$5.283	7,250,000	\$38,301,167
2	1-Feb-24	\$3.286	\$4.205	7,250,000	\$30,487,822
3	1-May-24	\$3.297	\$4.220	7,250,000	\$30,592,216
4	1-Aug-24	\$2.904	\$3.716	7,250,000	\$26,943,050
5	Total			29,000,000	\$126,324,255
6	Average	\$3.403	\$4.356		\$31,581,064

Note:

(1) Per Exhibit JT1.8.

Sources:

CME for NYMEX forward prices.

Kiodex for Dawn basis forward prices.

Consistent with forward pricing used for the company's QRAM filings.

Foreign Exchange: \$1 USD = \$1.3504 (Bank of Canada Closing Rate October 1, 2024)

Energy Conversions: 1 dth = 1 MMBtu = 1.055056

ENBRIDGE GAS INC.

Answer to Undertaking from
Environmental Defence (ED)

Undertaking:

Tr: 88

To provide the reference within the AMP to any design day demand forecast that underpins the plan.

Response:

Enbridge Gas's 2025 to 2034 Asset Management Plan (AMP)¹, as filed, does not include the design day demand forecast data. Within the AMP, Enbridge Gas referenced the application of the demand forecast to different business and system planning functions, including the AMP and the Gas Supply Plan, on page 50:

These demand forecasts and design elements are routinely included in various business and system planning functions such as System Reinforcement Plan (SRP), AMP, and the Gas Supply Plan.

Explanation of how the demand forecasts are used in the AMP for distribution and transmission system planning is set out at pages 86 and 87.

Enbridge Gas confirms the demand forecast data that underpins the 2025 to 2034 AMP, and the 5-Year Gas Supply Plan are based on the same utility demand forecast, prepared in 2024. The gas supply plan incorporates elements of the utility demand forecast that are specific to gas supply planning.

¹ EB-2020-0091, Enbridge Gas Asset Management Plan 2025-2034, November 8, 2024.

ENBRIDGE GAS INC.

Answer to Undertaking from
Consumers Council of Canada (CCC)

Undertaking:

Tr: 93

To provide all Vector contract detail included in the schedule at FRPO-37, Attachment 1, from November 2024 to CCC-9.

Response:

Please see Attachment 1 for all Vector contract detail¹ in the format as provided at Exhibit I.2-FRPO-37, Attachment 1.

Attachment 1 is based on an analysis originally prepared as part of Enbridge Gas's 2023 Annual Update². To be responsive in that proceeding, Enbridge Gas made simplifying assumptions regarding certain inputs such as demand and commodity fees, fuel costs, exchange rates, asset management agreement (AMA) release value, and Dawn purchases.

By contrast, the analysis included in response at Exhibit I.2-CCC-9, Attachment 1 (CCC-9), is based on an analysis completed to address an OEB directive in the Company's 2021 Vector Contracting Decision proceeding.³ Accordingly, the Company's "Cost Effectiveness: Actual Premium/(Discount) Compared to Landed Cost Forecast" set out in Appendix I and updated in response at CCC-9 includes the results of landed cost analyses completed from 2020 to 2023 and actual costs incurred from November 1, 2021 to July 31, 2025 for all Vector Pipeline contracts originating at Chicago (185,000 Dth/d).

¹ All Vector contracts originating in Chicago in the amount of 185,000 Dth/d are included. Vector backhaul capacity from Dawn and Vector capacity facilitating NEXUS deliveries to Milford Junction are excluded.

² EB-2023-0072.

³ EB-2023-0326, Enbridge Gas Inc. – 2021 Vector Contracting Decision (March 5, 2024), p.11; EB-20240067, OEB Staff Report to the OEB (January 15, 2025), pp.33-34, "Going forward, evidence in support of gas supply contracting decisions should include: ...The actual cost of any premium paid for the contract compared to the expected premium over the term of the contract. This hindsight information will provide the materiality of the contracting decision but is not expected to be used in the determination of prudence."

Due to the differences in approaches, the analysis set out in Attachment 1 differs from the actual financial costs incurred as presented in response at CCC-9, (see below for explanation of those differences). The former uses simplifying assumptions whereas the latter provides details of the actual costs (and premium or discounts to Dawn) incurred in relation to the Vector Pipeline capacity.⁴ As explained in the Company's 2024 Annual Update,⁵

"...the Company does not track detailed information about the actual premium paid for specific supply versus forecast premiums on a contract level. Enbridge Gas did prepare some analysis for the 2021 Vector Contracting decision, however, a large number of assumptions were made, and it was a very onerous and resource intensive exercise."

Accordingly, Table 1 provides a reconciliation of differences attributable to the simplifying assumptions in Attachment 1 and the cost details used to prepare the response at CCC-9.

Demand and Commodity Fees

Differences attributable to demand and commodity fees are related to annual contribution amount (ACA) surcharges, and usage charges. These fees are included in response at CCC-9 but not in Attachment 1.

Fuel Costs

Differences attributable to fuel charges are related to winter Asset Management Agreements (AMAs) whereby Enbridge Gas receives gas supplies at St. Clair and does not require fuel to transport volumes to its system(s) in Ontario. These actual fuel cost savings are included in response at CCC-9 but not in Attachment 1.

Exchange Rates

Differences attributable to actual invoiced costs compared to the monthly average Bank of Canada (BoC) exchange rate. Actual invoiced exchange rates are included in response at CCC-9 whereas the monthly average BoC exchange rate is assumed in Attachment 1.

AMA Capacity Release Value

Differences attributable to the accounting methodology for actual AMA capacity release values. Actual AMA capacity release values are included in Attachment 1, but not in response at CCC-9.⁶

⁴ Tr. Vol. 1, p.91.

⁵ EB-2024-0067, Reply Submission (July 31, 2024), pp.5-6.

⁶ AMA capacity release values are tracked and cleared separately through the applicable Purchased Gas Variance Account (PGVA).

Dawn Purchases

Differences attributable to the Dawn purchase profile are related to the Company's actual procurement decisions and associated costs. Actual Dawn purchase activity and costs incurred, including increased volumes of Dawn purchases during the winter season and reduced volumes during the summer season, short-term Dawn purchases (e.g., driven by increased customer demand, cold weather conditions, or operational constraints), and any necessary accounting adjustments (e.g., actual prices or volumes relative to plan), are included in response at CCC-9, but not in Attachment 1. Instead, Attachment 1 presents Dawn purchase costs based on an assumed even monthly distribution for the gas year in question.

Table 1
Reconciliation of Attachment 1 to CCC-9

Line No.	Particulars (\$ millions)	
1	Total Cost of Capacity vs. Dawn Purchase per Attachment 1	6
	<u>Assumption Differences</u>	
2	Demand and Commodity Fees	0
3	Fuel Costs	(1)
4	Exchange Rates	0
5	AMA Capacity Release Value	1
6	Dawn Purchases	(15)
7	Total of Assumption Differences	<u>(15)</u>
8	Adjusted Cost of Capacity vs. Dawn Purchase	<u>(9)</u>
9	Total Supply Purchased in Chicago (GJ) ⁽¹⁾	49,656,211
10	Actual Premium/(Discount) to Dawn (CAD/GJ) ^{(2) (3)}	(0.18)

Notes:

- (1) See Attachment 1, aggregate monthly volumes of "Supply Purchased in Chicago (MMBtu/d)" of 47,065,000 MMBtu converted to 49,656,211 GJ.
(2) Line No. 8 ÷ Line No. 9.
(3) Exhibit I.2-CCC-9, Attachment 1, column (d), line 29.

2024 - July 2025 Vector Cost Comparison by Month

Month	<u>Nov-24</u> 30	<u>Dec-24</u> 31	<u>Jan-25</u> 31	<u>Feb-25</u> 28	<u>Mar-25</u> 31	<u>Apr-25</u> 30	<u>May-25</u> 31	<u>Jun-25</u> 30	<u>Jul-25</u> 31	<u>Winter Total</u>	<u>Total</u>
Fuel ratio	0.27%	0.80%	0.83%	0.45%	0.66%	0.60%	0.70%	0.65%	0.60%		
Supply Purchased in Chicago (MMBtu/d) (1)	185,000	185,000	185,000	185,000	185,000	122,000	185,000	185,000	135,000		
Chicago Supply Cost (\$US/MMBtu) (1)	\$ 2.07	\$ 2.93	\$ 3.24	\$ 3.26	\$ 3.63	\$ 3.23	\$ 2.80	\$ 2.75	\$ 2.93		
Fuel cost (\$US/MMBtu)	\$ 0.01	\$ 0.02	\$ 0.03	\$ 0.01	\$ 0.02	\$ 0.02	\$ 0.02	\$ 0.02	\$ 0.02		
Total Chicago Supply Cost (\$US/MMBtu)	\$ 2.08	\$ 2.95	\$ 3.27	\$ 3.28	\$ 3.66	\$ 3.25	\$ 2.82	\$ 2.77	\$ 2.95		
Dawn price (\$US/MMBtu)	\$ 2.03	\$ 2.94	\$ 3.32	\$ 3.89	\$ 3.72	\$ 3.35	\$ 2.88	\$ 2.75	\$ 2.75		
Supply cost differential (\$US)	\$ 263,835	\$ 87,214	\$ (331,526)	\$ (3,201,394)	\$ (395,040)	\$ (383,586)	\$ (375,652)	\$ 125,944	\$ 831,157	\$ (3,576,910)	\$ (3,379,047)
Transportation Demand Charges (\$US)	\$ 900,000	\$ 930,000	\$ 930,000	\$ 840,000	\$ 930,000	\$ 900,000	\$ 930,000	\$ 900,000	\$ 930,000	\$ 4,530,000	\$ 8,190,000
Capacity released for UDC mitigation (MMBtu/d)	-	-	-	-	-	63,000	-	-	-		
Capacity released for purchase relocation (MMBtu/d)	-	-	-	-	-	-	-	-	50,000		
Capacity released for AMA, supply still purchased in Chicago (MMBtu/d) (1)	-	-	-	-	-	-	-	-	-		
UDC Capacity release value (\$US)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchase Relocation Capacity release value (\$US)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 46,500	\$ -	\$ 46,500
AMA Capacity release value (\$US)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 186,075	\$ 188,325	\$ 186,075	\$ 188,325	\$ -	\$ 748,800
Capacity release value (\$US)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 186,075	\$ 188,325	\$ 186,075	\$ 234,825	\$ -	\$ 795,300
Total cost of capacity vs. Dawn purchase (\$US)	\$ 1,163,835	\$ 1,017,214	\$ 598,474	\$ (2,361,394)	\$ 534,960	\$ 330,339	\$ 366,023	\$ 839,869	\$ 1,526,332	\$ 953,090	\$ 4,015,653
Total cost of capacity vs. Dawn purchase (\$Cdn)	\$ 1,626,459	\$ 1,448,513	\$ 861,204	\$ (3,377,029)	\$ 768,150	\$ 462,078	\$ 507,308	\$ 1,148,437	\$ 2,089,701	\$ 1,327,297	\$ 5,534,821

Source for Assumptions:

Supply Cost	Actual transacted supply cost including fuel requirements where applicable
Transportation Tolls	Actual contracted tolls
Foreign Exchange rate	Monthly Average from Bank of Canada
Energy conversions	1 MMBtu = 1.055056 GJ

Note:

(1) "Chicago" represents St. Clair U.S. during winter months. Enbridge Gas contracted AMAs where counterparties use Enbridge's U.S. Vector capacity to deliver firm gas volumes to St. Clair, a non-liquid hub that would otherwise be unviable without the Vector Capacity.

ENBRIDGE GAS INC.

Answer to Undertaking from
Building Owners and Managers Association (BOMA)

Undertaking:

Tr: 124

To search and see if Enbridge has a summary of the current status of municipal green standards or similar policies and provide it.

Response:

Please see Table 1 for a summary of the current status of municipal Green Development Standards (GDS) being followed by Enbridge Gas within the Company's franchise area. Enbridge Gas notes that sustainability measures included in GDS vary between municipalities and include a variety of non-energy related requirements, such as ecology, water, waste and community management (e.g. native planting needs, minimizing stormwater impacts, waste diversion requirements, transportation demand/mobility assessments). The application of sustainability measures within each GDS also varies according to building type and development size. GDS may also be imposed on a voluntary or mandatory basis where they may be currently in effect. Even where a GDS has been enacted on a mandatory basis, there may be optionality in how complying with the GDS may be achieved, and as such not all GDS include mandatory measures that would require a reduction of energy use or GHG emissions. The summary of the municipal GDS provided below identifies where energy efficiency or GHG performance standards were interpreted as mandatory or optional.

Table 1

Summary of Municipal GDS		
GDS status	Energy efficiency and GHG performance requirement	Municipality
In-effect	Mandatory	Toronto Caledon, Brampton, East Gwillimbury, Pickering, Ajax, Whitby
In-effect	Optional	Aurora, Markham, Vaughan, Richmond Hill, Mississauga*, King*, Halton Hills, Durham**
Under development	To be determined	Hamilton, Ottawa, Burlington, Clarington, Newmarket, Kingston, Guelph, Waterloo
Planned	To be determined	Oakville, Niagara, Barrie, Sudbury, Thunder Bay, London, Windsor, Oshawa, Stratford, Peterborough, Brantford

Note: (*) denotes standard that was not in-effect at the time of the 2025 Demand Forecast. (**) applies only to regionally owned buildings.

Enbridge Gas notes that on June 5, 2025, the Government of Ontario passed Bill 17, *Protect Ontario by Building Faster and Smarter Act*. Enbridge Gas understands that Bill 17 intended to clarify that municipalities cannot pass bylaws setting out construction standards for buildings. This includes, but is not limited to, local green building standards or green development standards as they pertain to the construction of a building, including any energy efficiency requirements for buildings. This was later followed by separate letters from the Deputy Minister of Municipal Affairs and Housing to the City of Toronto and other municipalities on June 19, 2025, which provides further emphasis on Bill 17's intent. Enbridge Gas is following the above noted GDS to see how municipalities will move forward, presumably by making their GDS voluntary or by removing them completely.

ENBRIDGE GAS INC.

Answer to Undertaking from
Pollution Probe (PP)

Undertaking:

Tr: 159

To advise as to when the AMP update will be filed during 2025 and under what docket number.

Response:

Enbridge Gas expects to file its 2026 to 2035 Asset Management Plan Addendum under docket number EB-2020-0091 in late October or early November 2025.

ENBRIDGE GAS INC.

Answer to Undertaking from
Pollution Probe (PP)

Undertaking:

Tr: 162

To advise which stakeholder asked for percentage of certified gas in the portfolio to be added to the matrix and when.

Response:

Enbridge Gas first added “percentage of certified gas in the portfolio”¹ as a performance metric with the 2023 Annual Update², in response to stakeholder interest in public policy metrics during Enbridge Gas’s 2022 Annual Update regulatory process³. Enbridge Gas is unable to find that the request was made by a specific stakeholder.

¹ The performance metric “percentage of certified gas in the portfolio” was named “percentage of RSG in the portfolio” in the 2023 and 2024 Annual Update.

² EB-2023-0072, p.55.

³ EB-2022-0072.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 10

To investigate and report, and if appropriate, provide any study that Enbridge gas has done that shows that index price purchases reduce exposure to market variability.

Response:

As stated on Day 2 of the Technical Conference,¹ Enbridge Gas confirms that it does not have any studies or analyses that would show that indexed price purchases reduce exposure to market variability.

On Day 2 of the Technical Conference, FRPO incorrectly claimed that “Part of the Panel’s responses yesterday emphasized the reducing exposure to **market volatility** on behalf of customers...”.² FRPO went on to ask “...what are the company’s views on transacting to fix the price of delivered winter supplies at Dawn in tranches, months in advance, as a means of reducing exposure to market volatility.”³

In fact, during Day 1 of the Technical Conference, in reference to its interrogatory responses, Enbridge Gas repeatedly explained that its preference is for indexed price purchases “...to reduce exposure to **market variability while achieving a fair market value**.”⁴ Enbridge Gas intentionally meant to differentiate between market volatility (i.e., month to month variation in settlement prices) and market variability (i.e., differences between Enbridge Gas’s actual costs and monthly market settlement prices). Enbridge Gas was specifically referring to the latter during the Technical Conference.

For example, if Enbridge Gas purchased a Dawn fixed price contract in November for delivery the following winter season from December to March for \$5.28 CAD/GJ,⁵ that fixed price contract would reduce price volatility by avoiding differences in actual monthly settlement prices for December (\$3.92 CAD/GJ), January (\$4.26 CAD/GJ),

¹ Tr. Vol. 2, pp. 8 & 10.

² Tr. Vol. 2, p.1. **(emphasis added)**

³ Ibid.

⁴ Exhibit I.2-STAFF-15, parts c-d); Tr. Vol.1, pp.59 & 64. **(emphasis added)**

⁵ Actual Dawn forward prices for NYMEX (CME) and Dawn basis (Kiodex) on November 1, 2023, for Dec '24 to Mar '25 delivery, consistent with response at Exhibit JT1.10 Table 1, column (c), line 1.

February (\$4.98 CAD/GJ), and March (\$4.77 CAD/GJ),⁶ ranging from \$3.92 CAD/GJ to \$4.98 CAD/GJ (i.e., volatility of \$1.06 CAD/GJ). However, that fixed price of \$5.28 CAD/GJ would vary from the actual monthly market settlement prices for December to March by a range of \$0.30 CAD/GJ to \$1.36 CAD/GJ (effectively the cost premium paid to reduce price volatility). Thus, fixed price purchases (which fix the entire price of gas supply in advance of delivery and effectively attempt to predict future market conditions and fundamentals) can result in reduced price volatility and increased market variability.

By contrast, purchasing an indexed price contract for Dawn gas supply in advance of delivery the following winter season from December to March would result in Enbridge Gas's actual costs being aligned (except for any minor basis premium fixed at the time of transaction) with the actual monthly settlement prices for December (\$3.92 CAD/GJ), January (\$4.26 CAD/GJ), February (\$4.98 CAD/GJ), and March (\$4.77 CAD/GJ). As a result, monthly market variability (i.e., difference between Enbridge Gas's actual costs and monthly market settlement prices) is effectively avoided, but monthly price volatility (i.e., month to month variation in settlement prices of \$1.06 CAD/GJ) is not. Market variability is inherently less for indexed price purchases as only a relatively minor basis portion of the price of gas supply is fixed in advance, leaving the majority of the price to be set based on the prevailing market conditions and fundamentals at the time of delivery.

Enbridge Gas agrees that fixed price purchases like those proposed by FRPO (as discussed above and in responses at Exhibit JT1.9 and JT1.10) could reduce price volatility compared to indexed price purchases. However, such fixed price purchases could increase exposure to market variability (i.e., the difference between the fixed price transacted and market prices at the time of delivery) and may result in higher overall costs of gas supply depending upon the ultimate accuracy of forward market prices. In this regard, the fixed price purchases proposed by FRPO are speculative as they seek to take a position on what the full future market price of natural gas will be up to a year in advance without any knowledge of related future market supply/demand fundamentals. The Company sees no need to take such risk as its current gas supply procurement strategy and practices effectively achieve fair market value and meet customer demands in a balanced way while maintaining flexibility to adapt to a dynamic operating environment.

Enbridge Gas explained during Day 2 of the Technical Conference that its view has consistently been that procuring a greater portion of its gas supply portfolio as fixed price purchases more than three months in advance (of delivery) would be a form of physical hedging and risk management⁷ with a goal of reducing price volatility. However, the Company's previous risk management programs, which considered the matter of reduced volatility for customers, were discontinued following previous determinations made by the OEB (whereby the OEB directed EGD to cease its

⁶ Based on actual monthly settlement prices paid by Enbridge Gas for Dawn gas supply.

⁷ Tr. Vol.2, p.2; Tr. Vol.2, pp.8-9.

program, and advised Union that recovery of associated costs would be disallowed).⁸ At that time, the OEB concluded that price volatility for customers was suitably managed through the QRAM process and the equal billing plan option.

⁸ Tr. Vol.2, pp.8-9; EB-2006-0034 (EGD's 2007 Rates) Decision with Reasons – Phase 1 (July 5, 2007), p.46; and EB-2007-0606/0615 (Union's 2008-2012 Incentive Rate Mechanism) Decision (July 31, 2008), p.17.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 27

To provide schematics of the dawn parkway system that show the design day shortfall in the CDA being met through Empress to CDA capacity and also being met through the assignment that has been entered into and explained in evidence in this case.

Response:

The Dawn Parkway System schematic of design day demands provided at Exhibit I.2-FRPO-17, Attachment 1 applies to both scenarios requested.

The capacity of the Dawn Parkway System is not impacted by the third-party Niagara to Enbridge CDA capacity assignment or by an equivalent Empress to Enbridge CDA delivery. In both scenarios no incremental gas is flowing on the Dawn Parkway System.

Table 1 provides an illustration of how the 2024/25 design day demands of the Enbridge CDA are met with no impact on the Dawn Parkway System (line 3) taking into consideration Ontario Transportation Service (OTS) customers switch to Dawn Transportation Service (DTS) shifting the obligated delivery point from the Enbridge CDA to Dawn.

Table 1

Line No.	Particulars (TJ/d)	2024/25 Design Day Position		
		Before OTS to DTS Shift (a)	After OTS to DTS Shift (1) (b)	Difference (c) = (a-b)
	<u>Design Day Demands</u>			
1	Enbridge CDA	3,578.3	3,578.3	-
	<u>Supply</u>			
2	Delivered Supply (2)	67.5	55.4	(12.1)
3	Dawn Parkway System	2,194.0	2,194.0	-
4	TCPL Long-Haul	5.0	5.0	-
5	TCPL Short-Haul	787.3	787.3	-
6	TCPL STS	283.9	283.9	-
	<u>Incremental Supply</u>			
7	TCPL Empress to Enbridge CDA	34.5	34.5	-
8	TCPL Niagara Falls to Enbridge CDA (Third-Party Assignment)	109.0	121.1	12.1
9	Peaking	97.3	97.3	-
10	Total Supply (sum of lines 2 to 9)	3,578.3	3,578.3	-
11	Supply Shortfall after Incremental Supply (line 1 – line 10)	-	-	-

Notes:

- (1) Exhibit I.2-FRPO-13, Attachment 1.
- (2) Effective winter 2024/25, direct purchase customer supply to the Enbridge CDA was reduced by 12.1 TJ/d as a result of direct purchase customers switching from OTS to DTS.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 36

To provide the month end balances for in-franchise utility storage and non-utility storage for the months of the summer of 2025.

Response:

Please see Table 1 for actual month end storage balances for the summer of 2025.

Table 1
2025 Actual Summer Month End Storage Balances

Line No.	Month End	Utility Storage Balances (% full)			Total Storage Balance (% full)
		Union rate zones	EGD rate zone	Total	Utility and Non-utility Storage
		(a)	(b)	(c)	(d)
1	April 2025	10.1%	16.8%	13.5%	34.5%
2	May 2025	16.2%	26.1%	21.1%	49.6%
3	June 2025	30.2%	41.9%	36.0%	57.9%
4	July 2025	48.1%	60.7%	54.4%	62.6%
5	August 2025	61.7%	77.7%	69.7%	74.6%

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 58

To advise as to the cost associated with being 2 percent over TransCanada's Limited balancing agreement threshold of 2 percent.

Response:

It is challenging to accurately calculate the penalties associated with discretionary (interruptible) overrun services above the two percent limited balancing agreement (LBA) threshold on the TCPL Mainline, as they differ for each delivery area and may be linked to daily traded natural gas market prices across the TCPL Mainline system if emergency operating conditions (EOC) are in effect.¹

Under standard operating conditions, a 4% LBA variance in the Enbridge EDA would result in standard daily balancing fees ranging from \$0.27792 to \$1.3896 CAD/GJ depending upon the magnitude (volume) of the variance. Incremental cumulative balancing fees may also apply if balances cannot be mitigated before the next gas day commences, ranging from \$0.20884 to \$0.3474 CAD/GJ.

Under EOC, a 4% LBA variance would result in daily EOC draft fees of 1.0 times the highest price of gas supply on the day amongst all receipt and delivery points on the TCPL Mainline system as published by S&P Global Gas Daily or such other recognized industry publication (including Iroquois).² Incremental cumulative balancing fees may also apply if balances cannot be mitigated before the next gas day commences, ranging from \$0.20884 to \$0.3474 CAD/GJ.

¹ The TCPL Mainline Daily Balancing Fees and Cumulative Balancing Fees associated with the discretionary overrun services provided via LBAs are summarized on the TCPL website as detailed in pages 33-36 of the General Terms and Conditions of TCPL's Tariff, at: https://www.tccustomerexpress.com/docs/ml_regulatory_tariff/09%20General%20Terms%20and%20Conditions%20-%20Effective%20January%201%202023.pdf

² As stated in responses at Exhibit I.2-CCC-4, part a), and Exhibit I.5-EP-2, over the past five years, daily Iroquois prices have settled as high as \$86.63 USD/MMBtu (winter 2022/23), during an extreme cold event, and \$34.44 USD/MMBtu in the most recent winter 2024/25.

As detailed in the Company's pre-filed evidence³, design day demand for the Enbridge EDA is 725.5 TJ/d. 2% of that volume is 14,510 GJ/d (the first 2% of LBA variance has no fees). Therefore, Enbridge Gas expects that under standard operating conditions, a 4% LBA variance would cost approximately \$4,000 CAD/day (assuming no cumulative balancing fees). Under EOC, a 4% LBA variance could cost more than \$1.6 million CAD/day assuming the highest recently observed Iroquois pricing (assuming no cumulative balancing fees).⁷

As previously described as part of the Company's Stakeholders' Conference for the 2021 Annual Update and in response to interrogatories in the current proceeding,⁴ discretionary services such as LBAs carry a far greater risk of interruption relative to firm transportation (FT) capacity, and should not be relied upon to meet firm design day demand long term. Enbridge Gas's prioritization of FT services to meet the design day demands of its customers, as well as its preference to avoid reliance on discretionary services such as LBAs is based on: (i) risk avoidance (i.e., failure to deliver) considering the Company's obligation to ensure secure and reliable firm delivery of natural gas supply to our customers on design day, and (ii) cost avoidance considering the exorbitant fees that could apply for large and/or cumulative balances (especially under EOC). Accordingly, any suggestion that the Company should consider increasing its long-term reliance on such discretionary services going forward, whether in combination with third-party (peaking) services or to replace firm transportation or storage services, should be rejected as doing so would be inconsistent with Enbridge Gas's gas supply planning principles and the OEB's Guiding Principles (i.e., reliability and security of supply).

³ EB-2025-0065, Appendix H, p.2, column (b), line 1.

⁴ EB-2021-0004, Stakeholder Conference, Tr. pp.138-139; Exhibit I.2-FRPO-6, part a).

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 61

To take the cost of the fifth item on the table in FRPO-1, Attachment 2, and translate that into the amount of capacity that could be contracted from Empress or Dawn to the EDA.

Response:

As presented in Exhibit I.1-FRPO-1, Attachment 2, the estimated annual cost of third-party (peaking) services is approximately \$2.02 million CAD, assuming the service is contracted for 10 days and utilized for 4 days to address design day shortfalls ranging from 14,331 to 21,428 GJ/day (for the 2024/25 to 2028/29 gas years).

In the response at Exhibit JT1.2, Table 1, Enbridge Gas outlines the demand charge for TCPL: Long-haul Firm Transportation (FT) service from Empress to the Enbridge EDA of \$1.04 CAD/GJ/day (which equates to \$379.60 CAD/GJ/year). Based on this rate, the estimated third-party (peaking) services cost of \$2.02 million CAD/year equates to approximately 5,321 GJ/day of annual FT capacity.

The response at Exhibit JT1.2, Table 1, also outlines the demand charge for TCPL: Short-haul FT via Dawn to Parkway to the Enbridge EDA of \$0.49 CAD/GJ/day (which equates to \$178.85 CAD/GJ/year). Based on this rate, the estimated third-party (peaking) cost of \$2.02 million CAD/year equates to approximately 11,294 GJ/day of annual FT capacity.

Importantly, TCPL demand charges (long-haul and short-haul) do not include natural gas supply costs, whereas the cost of the third-party (peaking) services do. Accordingly, translating the cost of peaking services into capacity using demand charges only is not directly comparable.

As discussed at length in the Company's pre-filed evidence and responses to interrogatories,¹ there is currently no available existing TCPL Mainline pipeline capacity from Empress or Dawn (Parkway) to the Enbridge EDA. In particular, no TCPL Mainline

¹ EB-2025-0065, pp.30-31, and Table 14; Exhibit I.2-STAFF-5; Exhibit I.2-STAFF-6.

capacity from Dawn (Parkway) to the Enbridge EDA has been made available since an existing capacity open season was conducted in June of 2023. As discussed in the Company's pre-filed evidence regarding the results of that open season,²

In June 2023, TCPL closed an open season for existing capacity that included the Enbridge EDA, having awarded capacity to bids with terms of up to 26 years. The Company explained in its 2024 Annual Update that based on these results, to be awarded short-haul capacity (e.g., Parkway to Enbridge EDA) the Company might need to bid for an excessively long term (i.e., over 60 years) to be successful since it may be competing against bids for a higher toll path (e.g., Empress to Enbridge EDA).

Further, as discussed during Day 1 of the Technical Conference Enbridge Gas participated in the August 2025 TCPL New Capacity Open Season³ ("NCOS") offering new transportation capacity from Empress to East Hereford (eastern most export point), Specifically, Enbridge Gas sought to contract for incremental capacity from Empress to the Enbridge EDA. However, the Company was not successful in being awarded any 2025 NCOS capacity.

² EB-2025-0065, p.30.

³ <https://www.tccustomerexpress.com/2862.html>