



Richard Wathy
Technical Manager
Regulatory Applications
Regulatory Affairs

tel 519-365-5376
Richard.Wathy@enbridge.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
P. O. Box 2001
50 Keil Drive North
Chatham, ON N7M 5M1

October 15, 2025

VIA RESS AND EMAIL

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2024-0125
2023 Utility Earnings and Disposition of Deferral & Variance Account
Balances – Draft Rate Order - Reply Comments – City of Kitchener**

In accordance with the OEB's Decision issued on September 23, 2025, Enbridge Gas filed the Draft Rate Order on September 29, 2025. On October 10, 2025, the City of Kitchener filed comments requesting additional information to understand why the credit percentage allocation got reduced for account number 179-159 and why the debit percentage allocation got increased for account number 179-381.

Please see Table 1 for a reconciliation of the amounts allocated to Rate T3 for these two accounts. The OEB-approved cost allocation methodologies are consistent between both draft rate orders.

The ICMDA (179-159) records the difference between actual revenue requirement and revenue collected on a project-by-project basis for each approved ICM project. As shown in Table 1, lines 3, 6, and 9, the percentage allocation to Rate T3 for each discrete ICM project is consistent between both draft rate orders. The difference in the total allocation to Rate T3 for this account is due to the weighting of the individual balances for each project, as shown in Table 1, line 12.

The APCDA (179-381) is allocated to Union rate classes in proportion to 2013 OEB-approved rate base. As shown in Table 1, line 17, the percentage allocation of the Union balance to Rate T3 is consistent between both draft rate orders.

Table 1
Rate T3 Deferral Account Allocation

Line No.	Particulars (\$000s)	Draft Rate Order Oct. 10, 2024 (a)	Draft Rate Order Sep. 29, 2025 (b)
<u>Incremental Capital Module D/A (179-159)</u>			
<u>Kingsville Transmission Reinforcement Project</u>			
1	Total Allocation	(469.3)	(470.9)
2	Rate T3 Allocation	(14.6)	(14.6)
3	Rate T3 Allocation (%)	3.109%	3.109%
<u>Windsor Line Replacement Project</u>			
4	Total Allocation	(514.7)	(793.0)
5	Rate T3 Allocation	-	-
6	Rate T3 Allocation (%)	0.000%	0.000%
<u>London Lines Replacement Project</u>			
7	Total Allocation	97.4	365.2
8	Rate T3 Allocation	2.9	11.1
9	Rate T3 Allocation (%)	3.026%	3.026%
<u>Total ICM D/A</u>			
10	Total Account Balance	(886.5)	(898.6)
11	Rate T3 Allocation	(11.6)	(3.6)
12	Rate T3 Allocation (%)	1.313%	0.399%
<u>Accounting Policy Changes D/A (179-381)</u>			
13	EGI Account Balance	5,546.4	5,720.4
14	Union Allocation	13,245.9	14,718.0
15	Rate T3 Allocation	78.4	87.1
16	Rate T3 Allocation (% of EGI)	1.414%	1.523%
17	Rate T3 Allocation (% of Union)	0.592%	0.592%

If you have any questions on the above or would like to discuss in more detail, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Richard Wathy".

Richard Wathy
Technical Manager, Regulatory Applications

cc.: D. Stevens (Aird & Berlis)
EB-2024-0125 Intervenors