



**Robin Stevenson**  
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**Enbridge Gas Inc.**  
50 Keil Drive N.  
Chatham ON, N7M 5M1

February 11, 2026

**VIA RESS AND EMAIL**

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)  
EB-2025-0064 - 2024 Rebasing – Phase 3  
Responses to OEB Settlement Presentation Questions**

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In accordance with Procedural Order No. 4 in the above noted proceeding, Enbridge Gas is filing written responses to the OEB's questions as set out in Schedule A.

Procedural Order No. 4 directs Enbridge Gas to consult with intervenors before filing these responses.

To meet this expectation, Enbridge Gas has provided draft responses of the written responses to all parties to the Settlement Proposal for their review and comment. Enbridge Gas has endeavoured to ensure that the final responses now being filed address all comments and suggestions received.

Sincerely,

*Robin Stevenson*

Robin Stevenson  
Technical Manager, Strategic Applications – Rate Rebasing

ENBRIDGE GAS INC.

Answer to OEB Settlement Presentation Question

Question(s):

The settlement proposal would result in certain adjustments to the 2024 revenue requirement. Enbridge Gas has proposed rates to recover the adjusted Phase 3 revenue requirement of \$5,329.9 million. This adjustment for Phase 3 results in a decrease to rates, or a revenue sufficiency of \$16.7 million.

- a) Please confirm that the \$16.7 million adjustment is a prospective adjustment, a credit to the benefit of customers, that will be implemented in 2027.
- b) Would a new customer, initiating service after January 1, 2025, benefit from the proposed adjustment in 2027?
- c) Please clarify if the \$16.7 million adjustment will be implemented on January 1, 2027, or whenever the harmonized rates are implemented.
- d) Please confirm if the lower gas costs in the 2024 revised revenue requirement calculation have already been achieved and whether Enbridge Gas is currently retaining the benefits of the lower gas costs.

Response:

- a) & c) The \$16.7 million adjustment is a base rate adjustment that reflects the forecast 2024 Gas Supply Plan at July 2024 QRAM.<sup>1</sup> Enbridge Gas will update base rates for the harmonized rate classes (including the \$16.7 million adjustment) for the most recent QRAM as part of the implementation in 2027.
- b) All customers will be subject to the harmonized rates and rate adjustments when they are implemented in 2027. As set out in response to part d), all customers pay the actual gas costs incurred. The implementation of the base rate adjustment will adjust the recovery of gas costs between base rates and gas supply variance

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<sup>1</sup> The \$16.7 million adjustment is a revenue sufficiency that includes \$18.6 million in gas costs less adjustments for consolidated billing and an update to the Parkway Delivery Commitment Incentive costs, as shown at Exhibit N1, Tab 1, Schedule 1, page 14

accounts.

- d) Customers currently pay and will continue to pay upon implementation of the harmonized rate classes, the actual gas costs incurred through a combination of base rates and gas supply variance accounts (through cost adjustment Rider C). The \$16.7 million adjustment changes the recovery of gas costs between base rates and gas supply variance accounts but does not change the total amount of gas costs recovered by customers, as gas costs are passthrough costs.

The actual and forecast costs of the gas supply portfolio change with every QRAM. To the extent that actual gas costs have been lower relative to the gas costs included in current base rates, those changes would have been included in gas supply variance accounts recovered/refunded through QRAM cost adjustments. Enbridge Gas does not retain or benefit from changes in the gas supply portfolio costs.

ENBRIDGE GAS INC.

Answer to OEB Settlement Presentation Question

Question(s):

The settlement proposal indicates that the parties have agreed on a Rate Mitigation Plan to limit total bill increases to 3% on average in any year so as to provide stable and reasonable bill impacts for customers. Enbridge Gas proposes to implement the mitigation riders (Rider R) over 5 years with changes every 12 months. The rate mitigation credits and charges would decrease over the five-year period until they expire in year 4 with final bill impacts and unmitigated rates in effect by year 5.

- a) Enbridge Gas expects the first year of Rider R to be implemented in 2027. If there are rate increases as a result of the price cap adjustment in 2027 and 2028 and this results in a cumulative annual increase of more than 3% for certain rate classes, would the 3% cap as per the Rate Mitigation Plan apply to the total bill impact that is inclusive of the annual rate adjustment?
- b) Is Enbridge Gas's understanding that the principle of Rider R would be retained until 2031, but the quantum and recovery mechanism of the rate rider could be adjusted at the next rebasing?
- c) Is Enbridge Gas planning to engage with parties to the Phase 3 settlement proposal prior to filing its annual rate applications with the OEB, if the application proposes Rider R? What assurance will Enbridge Gas provide the OEB, that the Rider R proposals adhere to the objectives as stated in the settlement proposal and agreed to by the parties?

Response:

- a) No. Rider R smooths the one-time impact of implementing the rate harmonization plan over a five-year period. The 3% limit was used as a guideline to determine the level of mitigation required to smooth the transition to the harmonized rate classes.

The 3% limit relates to the 2024 Test Year Forecast and the Phase 3 implementation of harmonized rate classes. It will not be adjusted over time to account for other approved rate changes in subsequent proceedings that may occur prior to or after

implementation of the harmonized rate classes. Should mitigation be required for a subsequent proceeding, it would be proposed as part of that application (noting that total bill impacts being mitigated at that time could include the current year impacts of Rider R on certain rate classes).

- b) No. Rider R adjustments will continue as calculated in the Phase 3 Draft Rate Order until they expire, subject to OEB approval of the Phase 3 Settlement Proposal.
- c) As noted above, and consistent with the Settlement Proposal, Enbridge Gas will not adjust the Rider R unit rates from the amounts included in Draft Rate Order and as such, would not need to engage with parties on this topic as part of the annual rate setting process.

ENBRIDGE GAS INC.

Answer to OEB Settlement Presentation Question

Question(s):

The settlement proposal (pages 15 and 16) provides total bill impacts for a typical residential and small commercial sales service customer in each rate zone resulting from this settlement proposal. The total bill impact presentation includes two scenarios, one excluding the Rate Mitigation Rider R and a second scenarios that includes the Rate Mitigation Rider R.

- a) The total bill impact for Rate 6 in the Central Rate Zone shows a bill decrease of 7.8% excluding the Rate Mitigation Rider R and a decrease of 12.8% with the inclusion of the Rate Mitigation Rider R. Please explain how the inclusion of the Rate Mitigation Rider R has resulted in a further decrease to the total bill impact for Rate 6 considering that the Rate Mitigation Plan appears to be aimed at increases to the total bill impact.

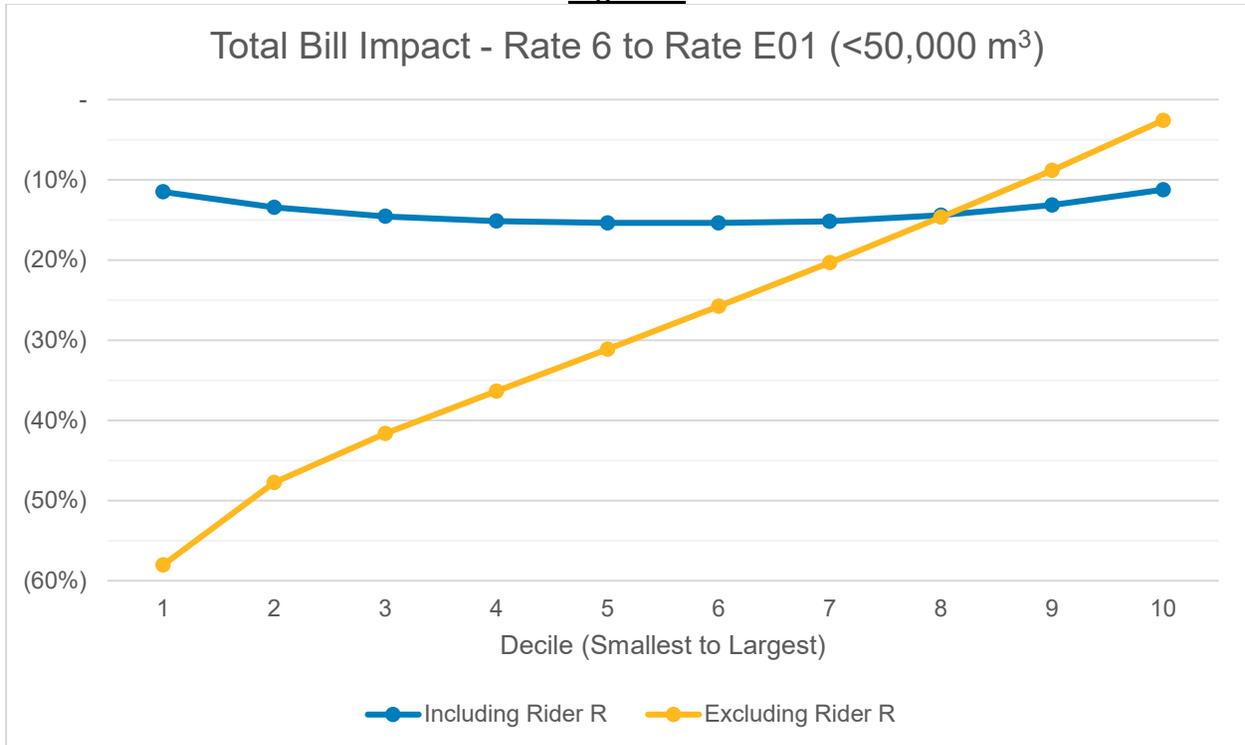
Response:

The Rate 6 bill impacts provided in the settlement proposal (pages 15 and 16) are based on a predefined typical average Rate 6 customer consuming 22,606 m<sup>3</sup> per year and do not represent the impacts that will be experienced by all Rate 6 customers. Rate 6 customers consuming less than 50,000 m<sup>3</sup> annually are moving to Rate E01 and are experiencing bill decreases primarily due to the lower monthly customer charge. Bill impacts excluding Rider R for these customers vary depending on annual volume, ranging from (58.0%) for the smallest decile to (2.6%) for the largest decile. For reference, a Rate 6 customer consuming 22,606 m<sup>3</sup> is in the 9<sup>th</sup> decile of customers moving to Rate E01.

Rider R unit rates for Rate 6 customers moving to Rate E01 include an increase (debit) to the monthly customer charge and a decrease (credit) to the delivery charge such that the bill impacts including Rider R are relatively flat across all deciles and the overall Rider R revenue is positive (these customers are funding credits to other customers). Consequently, Rider R results in a bill increase relative to Rate E01 base rates for the smallest 80% of customers moving from Rate 6 to Rate E01. However, even when Rider R is included, virtually all of these customers will still experience total bill decreases between (11.2%) and (15.4%) upon transition to harmonized rates. Figure 1 demonstrates the bill impacts by decile for Rate 6 customers moving to Rate E01.

The bill impacts, both including and excluding Rider R, for actual customers by decile moving to Rate E01 are provided at Rate Order, Working Papers, Schedule 19, page 1. The data for the general service decile charts excluding Rider R and including Rider R are provided at Attachment 1 and Attachment 2, respectively.

Figure 1



General Service Total Bill Impacts  
Excluding Rider R  
Central Rate Zone

Line No.	Particulars	Rate 1		Rate 6		Rate 01 - NE		Rate 10 - NE	
		Annual Consumption (m <sup>3</sup> ) (a)	Total Bill Impact (b)	Annual Consumption (m <sup>3</sup> ) (c)	Total Bill Impact (d)	Annual Consumption (m <sup>3</sup> ) (e)	Total Bill Impact (f)	Annual Consumption (m <sup>3</sup> ) (g)	Total Bill Impact (h)
<u>Rate E01</u>									
1	Decile 1	984	3.9%	470	(58.0%)	882	(10.3%)		
2	Decile 2	1,585	2.6%	1,473	(47.8%)	1,451	(14.4%)		
3	Decile 3	1,874	2.1%	2,356	(41.6%)	1,732	(15.8%)		
4	Decile 4	2,114	1.9%	3,354	(36.3%)	1,964	(16.7%)		
5	Decile 5	2,341	1.6%	4,647	(31.1%)	2,185	(17.4%)		
6	Decile 6	2,575	1.4%	6,483	(25.8%)	2,420	(18.1%)		
7	Decile 7	2,834	1.2%	9,237	(20.3%)	2,693	(18.7%)		
8	Decile 8	3,153	1.0%	13,556	(14.7%)	3,064	(19.5%)		
9	Decile 9	3,629	0.8%	21,040	(8.8%)	3,719	(20.4%)		
10	Decile 10	5,444	0.2%	36,527	(2.6%)	10,074	(23.3%)		
<u>Rate E02</u>									
11	Decile 1			53,203	(2.5%)			41,745	(22.8%)
12	Decile 2			60,465	(2.1%)			55,148	(23.2%)
13	Decile 3			69,778	(1.6%)			61,409	(23.2%)
14	Decile 4			81,768	(1.0%)			70,198	(23.3%)
15	Decile 5			99,293	(0.3%)			80,275	(23.3%)
16	Decile 6			123,849	0.6%			94,165	(23.2%)
17	Decile 7			159,041	1.4%			114,103	(23.1%)
18	Decile 8			217,302	2.3%			146,251	(22.9%)
19	Decile 9			321,611	3.4%			213,599	(22.6%)
20	Decile 10			770,641	5.1%			543,878	(21.4%)

General Service Total Bill Impacts  
Excluding Rider R  
North Rate Zone

Line No.	Particulars	<u>Rate 01 - NW</u>		<u>Rate 01 - NE</u>		<u>Rate 10 - NW</u>		<u>Rate 10 - NE</u>	
		Annual Consumption (m <sup>3</sup> ) (a)	Total Bill Impact (b)	Annual Consumption (m <sup>3</sup> ) (c)	Total Bill Impact (d)	Annual Consumption (m <sup>3</sup> ) (e)	Total Bill Impact (f)	Annual Consumption (m <sup>3</sup> ) (g)	Total Bill Impact (h)
	<u>Rate E01</u>								
1	Decile 1	882	2.2%	882	(8.7%)				
2	Decile 2	1,451	1.1%	1,451	(12.4%)				
3	Decile 3	1,732	0.7%	1,732	(13.6%)				
4	Decile 4	1,964	0.4%	1,964	(14.4%)				
5	Decile 5	2,185	0.2%	2,185	(15.1%)				
6	Decile 6	2,420	0.1%	2,420	(15.7%)				
7	Decile 7	2,693	(0.1%)	2,693	(16.3%)				
8	Decile 8	3,064	(0.2%)	3,064	(16.9%)				
9	Decile 9	3,719	(0.4%)	3,719	(17.8%)				
10	Decile 10	10,074	(0.1%)	10,074	(20.2%)				
	<u>Rate E02</u>								
11	Decile 1					41,745	1.6%	41,745	(19.1%)
12	Decile 2					55,148	1.8%	55,148	(19.4%)
13	Decile 3					61,409	1.9%	61,409	(19.4%)
14	Decile 4					70,198	2.0%	70,198	(19.4%)
15	Decile 5					80,275	2.3%	80,275	(19.4%)
16	Decile 6					94,165	2.8%	94,165	(19.2%)
17	Decile 7					114,103	3.3%	114,103	(19.1%)
18	Decile 8					146,251	3.9%	146,251	(18.9%)
19	Decile 9					213,599	4.8%	213,599	(18.5%)
20	Decile 10					543,878	7.3%	543,878	(17.2%)

General Service Total Bill Impacts  
Excluding Rider R  
South Rate Zone

Line No.	Particulars	Rate M1		Rate M2	
		Annual Consumption (m <sup>3</sup> ) (a)	Total Bill Impact (b)	Annual Consumption (m <sup>3</sup> ) (c)	Total Bill Impact (d)
<u>Rate E01</u>					
1	Decile 1	816	9.0%		
2	Decile 2	1,380	7.8%		
3	Decile 3	1,654	7.5%		
4	Decile 4	1,879	7.3%		
5	Decile 5	2,093	7.1%		
6	Decile 6	2,318	7.0%		
7	Decile 7	2,578	6.9%		
8	Decile 8	2,920	6.8%		
9	Decile 9	3,519	6.7%		
10	Decile 10	9,204	6.5%		
<u>Rate E02</u>					
11	Decile 1			40,373	(1.7%)
12	Decile 2			56,220	(2.0%)
13	Decile 3			64,281	(2.0%)
14	Decile 4			73,909	(2.0%)
15	Decile 5			86,306	(2.0%)
16	Decile 6			102,594	(2.0%)
17	Decile 7			127,565	(2.0%)
18	Decile 8			169,817	(1.8%)
19	Decile 9			241,963	(1.5%)
20	Decile 10			615,669	(0.8%)

General Service Total Bill Impacts  
Including Rider R  
Central Rate Zone

Line No.	Particulars	<u>Rate 1</u>		<u>Rate 6</u>		<u>Rate 01 - NE</u>		<u>Rate 10 - NE</u>	
		<u>Annual Consumption</u>	<u>Total Bill Impact</u>						
		(m <sup>3</sup> )		(m <sup>3</sup> )		(m <sup>3</sup> )		(m <sup>3</sup> )	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
<u>Rate E01</u>									
1	Decile 1	984	3.9%	470	(11.5%)	882	(13.8%)		
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5	Decile 5	2,341	1.6%	4,647	(15.4%)	2,185	(14.0%)		
6	Decile 6	2,575	1.4%	6,483	(15.4%)	2,420	(14.0%)		
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20	Decile 10			770,641	5.1%			543,878	(12.6%)

General Service Total Bill Impacts  
Including Rider R  
North Rate Zone

Line No.	Particulars	<u>Rate 01 - NW</u>		<u>Rate 01 - NE</u>		<u>Rate 10 - NW</u>		<u>Rate 10 - NE</u>	
		Annual Consumption	Total Bill Impact						
		(m <sup>3</sup> )		(m <sup>3</sup> )		(m <sup>3</sup> )		(m <sup>3</sup> )	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
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General Service Total Bill Impacts  
Including Rider R  
South Rate Zone

Line No.	Particulars	Rate M1		Rate M2	
		Annual Consumption (m <sup>3</sup> ) (a)	Total Bill Impact (b)	Annual Consumption (m <sup>3</sup> ) (c)	Total Bill Impact (d)
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<u>Rate E02</u>					
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12	Decile 2			56,220	(2.0%)
13	Decile 3			64,281	(2.0%)
14	Decile 4			73,909	(2.0%)
15	Decile 5			86,306	(2.0%)
16	Decile 6			102,594	(2.0%)
17	Decile 7			127,565	(2.0%)
18	Decile 8			169,817	(1.8%)
19	Decile 9			241,963	(1.5%)
20	Decile 10			615,669	(0.8%)

ENBRIDGE GAS INC.

Answer to OEB Settlement Presentation Question

Question(s):

Enbridge Gas has filed a draft rate order that reflects the amended Phase 3 settlement proposal for this proceeding. As part of the rate order process, Enbridge Gas is requesting OEB approval for the Rate Handbook that reflects the harmonized rate classes and services. The rate schedules in the draft rate order do not include an effective date.

- a) Please confirm if the draft rate order is (a) a placeholder that provides the calculation of the harmonized rates for approval in this Phase 3 proceeding, and (b) that final rates will be updated for approval in a subsequent rate order in accordance with other OEB approved rate changes.
- b) If approved in this proceeding, when would the rate schedules in the Rate Handbook be effective? Please explain the customer implications of “Effective Implemented OEB Order EB-2025-0064” at the bottom of each rate schedule.
- c) Please identify the pages or sections of the Rate Handbook to be updated in a subsequent OEB proceeding.
- d) How will the rate mitigation cap of 3% affect the 10% total bill impact threshold applied in QRAM proceedings?
- e) Would there be a change to the proposed harmonized rates if the final rate order resulting from the settlement proposal is implemented at some point after January 1, 2027?

Response:

- a) Confirmed for both parts (a) and (b).

The Rate Handbook included in the Draft Rate Order:

- Provides the structure, appearance and format of the Rate Handbook for harmonized rate classes;

- Incorporates the services and rate harmonization agreed to by parties in the Settlement proposal; and
- Includes the harmonized unit rates based on the 2024 Test Year Forecast for Phase 3 of this proceeding.

The Rate Handbook will be updated in the 2027 Rates Application to incorporate the final 2027 rates for the harmonized rate classes, including any updates for Phase 2 of the proceeding<sup>1</sup>, and the approved (in Phase 2) incentive rate-setting mechanism (IRM) adjustments beginning in 2025 until the date of implementation. 2027 rates will also be updated to reflect the approved QRAM at the time of implementation.

The Settlement Proposal reflects that the timing for implementation of the harmonized rates in 2027 is not yet finalized, but notes that substantial lead time is required.<sup>2</sup> The Settlement Proposal indicates that:

*Enbridge Gas will file a more detailed Rate Harmonization Implementation Plan as part of its 2027 Rates Application. This will allow for consideration of all aspects of the Rate Harmonization Implementation Plan prior to the rollout of any approved harmonization changes or implementation of harmonized rates. Enbridge Gas anticipates that the 2027 Rates Application will include proposals for rate adjustments resulting from the mid-year implementation of harmonized rate classes and rate design changes. Parties are free to take any position on the proposed Rate Harmonization Implementation Plan when it is presented for approval in the 2027 Rates Application (or in any other proceeding where any aspect of the Rate Harmonization Implementation Plan is presented for approval).<sup>3</sup>*

Enbridge Gas can advise that it is currently planning to file its 2027 Rates Application in two parts. This is because the Company will not be ready to implement harmonized rates on January 1, 2027.

The first part of the 2027 Rates Application will include the mechanistic IRM adjustments to current rate classes (non-harmonized rates) in order to implement (unharmonized) 2027 rates on January 1, 2027.

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<sup>1</sup> Phase 2 updates include a revenue deficiency of \$8.5 million related to the impacts of Dawn to Corunna, unregulated storage cost allocators and Enbridge Sustain, as noted at EB-2024-0111, Exhibit N, Tab 1, Schedule 1, Table 1, page 12.

<sup>2</sup> The Settlement Proposal (Exhibit N1, Tab 1, Schedule 1) includes a footnote #12 (page 45) indicating that: "As set out in Exhibit 8, Tab 2, Schedule 1, Enbridge Gas anticipates a lead time of approximately 1 to 2 years following the OEB decision in this Application to implement changes to the internal and customer facing business applications and processes, and to provide notice to customers of changes to their services."

<sup>3</sup> Settlement Proposal (Exhibit N1, Tab 1, Schedule 1), Issue 8, page 45.

The second part of the 2027 Rates Application will include the Rate Harmonization Implementation Plan for implementation of harmonized rates and services for general service and contract customers at some time(s) later in 2027. Final harmonized 2027 rates will be included in the Rate Handbook filed in the second part of the 2027 Rates application and will be effective when the applicable harmonized rates are implemented.

- b) Enbridge Gas will file a more detailed Rate Harmonization Implementation Plan as part of its 2027 Rates Application, including an update to the effective date of the rate schedules. The reference at the bottom of the rate schedules will also be updated at that time, prior to implementation.
- c) The following information will be updated as part of the 2027 Rates Application:
  - The effective and implementation information at the bottom of each page in the Rate Handbook, which will be updated to reflect the implementation date and the previous docket that the Rate Handbook supersedes; and
  - The unit rates provided in the rate schedules and riders (pages 7 to 61).

To the extent that other changes are identified and proposed to be made to the Rate Handbook prior to the implementation of the harmonized rate classes, Enbridge Gas will request OEB approval of those changes as part of the 2027 Rates Application or subsequent application.

- d) The rate mitigation cap of 3% is separate and distinct from mitigation thresholds applied through the QRAM process. The 3% limit for Rider R was used as a guideline to determine the level of mitigation required to smooth the one-time impacts of implementing the rate harmonization plan as described in Settlement Presentation Question 2. Rate mitigation is considered in a QRAM proceeding if the bill impact of the commodity portion of a customer's bill exceeds 25% and/or if the total bill impact exceeds 10%<sup>4</sup>. The total bill impacts in a QRAM application include both the change in gas costs for the QRAM period and the rate impacts from other proceedings which are being implemented concurrently. As such, the bill impacts related to the annual changes in the rate mitigation rider (Rider R) will be included in the determination of the total bill impacts for coinciding QRAM applications. This is consistent with the current approach to considering bill impacts across multiple applications when the combined total bill impact exceeds 10%.

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<sup>4</sup> EB-2022-0089, Decision and Order, March 24, 2022, p.8.

- e) Enbridge Gas anticipates that the harmonized rates will be implemented during 2027, after January 1, 2027, and does not expect the implementation date to impact the harmonized rates. As described in part a), the harmonized rates will be updated to reflect any approved changes to rates, including annual rate and QRAM adjustments.

ENBRIDGE GAS INC.

Answer to OEB Settlement Presentation Question

Question(s):

What is the path toward making 2024 rates final?

Response:

Since 2024, Enbridge Gas's rates have been approved on an interim basis pending the Phase 1 Rebasing outcomes of the judicial review and statutory appeal processes. Once outcomes from these processes are complete (including any necessary subsequent OEB reconsideration processes), Enbridge Gas will either propose an update to the interim rates to incorporate the outcome, if applicable, or request that the existing interim rates be approved on a final basis.