



Justin Egan  
Technical Manager,  
Regulatory Applications  
Regulatory Affairs

Cell: 519-350-3398  
Email: justin.egan@enbridge.com  
EGIRegulatoryProceedings@enbridge.com

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

**VIA RESS and EMAIL**

March 18, 2026

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

Dear Ritchie Murray:

**Re: EB-2026-0091 – Enbridge Gas Inc. – April 1, 2026  
Quarterly Rate Adjustment Mechanism (QRAM) Application**

On March 10, 2026, Enbridge Gas filed the April 1, 2026, QRAM application with the Ontario Energy Board (OEB). Enbridge Gas has received questions from OEB Staff and the Federation of Rental-housing Providers of Ontario (FRPO). Enbridge Gas has also received a letter from the Canadian Manufacturers & Exporters (CME).

CME has reviewed the QRAM application along with the questions filed by the FRPO and has no additional questions.

Please find enclosed the responses of Enbridge Gas to the questions received from OEB Staff and FRPO, set out as interrogatory responses.

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

Sincerely,

Justin Egan  
Technical Manager, Regulatory Applications

cc: All Interested Parties EB-2008-0106, EB-2019-0137, EB-2024-0067,  
EB-2022-0200, and EB-2024-0111

ENBRIDGE GAS INC.

Answer to Interrogatory from the  
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

- (i) Cover Letter, page 2
- (ii) Exhibit A, Tab 3, Schedule 1

Preamble:

Enbridge Gas stated that forecast natural gas prices have decreased relative to January 2026 QRAM forecasts across all purchase locations.

The commodity-related bill impacts for typical residential customers are as follows:

<b>Rate Zone</b>	<b>Commodity Bill Impacts</b>	
EGD	-\$81.06	-32.0%
Union South	-\$50.07	-11.8%
Union North East	-\$42.58	-10.2%
Union North West	-\$113.16	-45.1%

Question:

Please provide an explanation of the market dynamics underlying the commodity-related bill decreases, particularly in the Union North West and EGD rate zones.

Response:

Commodity-related bill decreases are primarily attributed to decreases in the forward market prices for natural gas used to derive the gas supply commodity rates for each rate zone. To derive the gas supply commodity rates for the EGD rate zone, Enbridge Gas utilizes the Empress price. As noted in Exhibit B, Tab 4, Schedule 1, paragraph 17, the change in the Empress price from January 2026 QRAM to April 2026 QRAM is a decrease of \$35.522/10<sup>3</sup>m<sup>3</sup> or 26.2%. To derive the gas supply commodity rates for the Union North West rate zone, Enbridge Gas utilizes the Alberta Border reference price based on the forward market price at Empress. As noted in Exhibit D, Tab 1, Schedule 1, paragraph 8, the change of the Alberta Border Reference Price from January 2026 QRAM to April 2026 QRAM is a decrease of \$0.802/GJ or 23.0%.

In comparison, to derive the gas supply commodity rates for the Union South rate zone and the Union North East rate zone, Enbridge Gas utilizes the Dawn reference price based on the forward market price at Dawn. As noted in Exhibit D, Tab 1, Schedule 1, paragraph 11, the change of the Dawn Reference Price from January 2026 QRAM to April 2026 QRAM is a decrease of \$0.715/GJ or 13.6%.

While the EGD rate zone and Union North West rate zone use market pricing at Empress to derive their commodity rates, these rate zones also use transportation charges reflecting the cost to transport natural gas supply from western Canada and other supply points to the two rate zones. In comparison, market pricing at Dawn is used to derive the commodity rate for the Union South rate zone which already reflects the cost to transport natural gas supply from various producing regions across North America to Dawn. These differences can be seen in Exhibit A, Tab 3, Schedule 1 by comparing the sum of transportation and commodity charges for the EGD rate zone (\$150.02 + \$244.19 = \$394.21) to the commodity charge for the Union South rate zone of \$388.10. The small difference in these costs is due to each rate zone having its own gas supply plan and the EGD rate zone being geographically located farther east from Dawn.

The remainder of commodity-related bill impacts for all rate zones are attributed to changes in deferral and variance riders. Please see Table 1 for a comparison between the 12-month 21-day strip commodity projection data used for the April QRAM and those used for the January QRAM.

Table 1  
21-Day Strip Commodity Projection Comparison

Line No.	Supply Point (a)	12-month forward price at April QRAM (CAD/GJ) (b)	12-month forward price at January QRAM (CAD/GJ) (c)	Change (%) (d)
1	Empress	2.47	3.35	(26.2)
2	AECO	2.09	3.05	(31.5)
3	Dawn	4.45	5.16	(13.7)
4	Niagara	4.07	4.76	(14.6)
5	Ontario Production	4.45	5.16	(13.7)
6	Chicago (Vector)	4.69	5.34	(12.1)
7	Panhandle Fieldzone	4.04	4.94	(18.2)
8	Dominion South	3.76	4.28	(12.1)
9	NEXUS	4.22	4.65	(9.3)
10	Iroquois	8.03	8.04	(0.2)
11	Foreign Exchange Rate (USD/CAD)	1.35	1.39	(2.7)

Forward forecast prices in late November 2025 used for January QRAM reflected actual colder than normal winter conditions experienced in Ontario in November and projected for December as well as typical seasonal risks for the remainder of the winter 2025/26 (e.g., continued colder than normal conditions, extreme cold conditions, low storage inventories, or unplanned pipeline constraints). As of late February 2026, many of these risks had been resolved or reduced, and the market adjusted its focus to the commencement of the summer injection season on April 1. As a result, forward forecast commodity prices softened for the April QRAM.

As detailed in Table 1, 12-month forward forecast commodity prices at all purchase locations have declined since November 2025. Similarly, Henry Hub (NYMEX) forward forecast commodity prices have also declined by about 9% since that time.<sup>1</sup> Reductions in forecast prices for western Canadian natural gas supply (AECO and Empress) are greater than the decreases observed for other purchase locations due to actual winter 2025/26 conditions experienced across North America. While Ontario, eastern Canada, and the eastern U.S. experienced colder than normal winter conditions, much of western Canada and the western U.S. experienced more moderate winter conditions, leading to robust western Canadian supply (i.e., robust and growing production, and higher storage inventory levels). Longer-term, forecast prices reflect continued robust production levels in western Canada throughout 2026.

---

<sup>1</sup> Exhibit B, Tab 1, Schedule 1.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, p. 3 & Exhibit C, Tab 2, Schedule 1

Preamble:

QRAM evidence states: *Enbridge Gas recalculated the EGD rate zone PGVA Reference Price (PGVA Reference Price) based upon a 21-day average of various indices from January 29, 2025 to February 27, 2025 for 12 months commencing April 1, 2026,...*

Question:

Please confirm that 21-day period should be dates in 2026 not 2025.

Response:

Confirmed. Enbridge Gas recalculated the EGD rate zone PGVA Reference Price (PGVA Reference Price) based upon a 21-day average of various indices from January 29, 2026 to February 27, 2026 for 12 months commencing April 1, 2026.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, p. 3 & Exhibit C, Tab 2, Schedule 1

Preamble:

*QRAM evidence states: As a result of these conditions, Enbridge Gas experienced higher than forecast customer demands and purchased more than 45 PJ of incremental natural gas supply at Dawn on behalf of sales service customers in all rate zones. Due to the timing of these transactions and, as the 2025/2026 winter season is not yet complete, a detailed reconciliation of the drivers of incremental gas supply volumes and explanation of cost/account impacts by rate zone will be included in the Company's July 2026 QRAM evidence.*

We understand the rebasing proceedings have brought changes to gas supply and load balancing. In this set of questions and those on the next page. We would like to understand better the principles behind the determination of and allocation of the costs to customers for the incremental purchases.

Question:

Please outline the approach that EGI has used or would be expecting to use to (in the July 2026 QRAM evidence):

- a) Determine the amount of cost to be that will be considered incremental to the costs in the Gas Supply plan.
  - i) Relative to volumes in GSP from 2018? If so, please specify the principles, the approach and provide the derivation.
  - ii) Relative to volumes in the GSP from EB-2022-0200? If so, please specify the principles, the approach and provide the derivation.

Response:

Natural gas supply purchases during the 2025/26 winter season exceeding planned purchase volumes (as established within the Company's 2025/26 gas supply plan<sup>1</sup>) are considered incremental. The 2025/26 gas supply plan is a consolidated plan, incorporating all Enbridge Gas storage and transportation assets to determine the optimal supply mix to meet demand requirements across each of the nine delivery areas served. Similarly, execution of the gas supply plan occurs on a consolidated basis, including gas supply purchases (planned and incremental). Considering that the winter 2025/26 season was planned and executed/operationalized on a consolidated basis and is not yet complete, a detailed seasonal reconciliation of the drivers of incremental gas supply volumes and explanation of cost/account impacts by rate zone has not been completed. Enbridge Gas will provide detailed explanation regarding incremental purchase volumes, drivers, and impacts by rate zone as part of its evidence supporting the July QRAM once all 2025/26 winter season volumes are final.

As part of the Settlement in Phase 2 of the 2024 Rebasing Proceeding<sup>2</sup>, parties agreed to Enbridge Gas's proposal to implement the cost consequences of the 2024 Gas Supply Plan as part of Phase 3 of the Rebasing Proceeding<sup>3</sup>. Until the outcomes from Phase 3 are implemented, Enbridge Gas will continue to use the existing gas cost variance accounts to track price variances between gas costs embedded in rates and actual gas costs<sup>4</sup>.

Enbridge Gas has reflected the ratemaking consequences of the implementation of the 2024 Gas Supply Plan in the Draft Rate Order as part of Phase 3 Settlement<sup>5</sup>. In the 2027 Rates Application, which will be filed in mid-2026, Enbridge Gas will seek approval of the updated harmonized rates. In that application, the Company will provide a more detailed Rate Harmonization Implementation Plan. The Company expects to file a harmonized QRAM application some time in 2027, depending on the implementation timing of harmonized rates. Until such time, the Company continues to follow the approved QRAM methodologies for both the EGD and Union rate zones.

---

<sup>1</sup> Details of which are set out in the Company's 2026 Annual Gas Supply Plan Update (EB-2026-0092)

<sup>2</sup> EB-2024-0111.

<sup>3</sup> EB-2025-0064.

<sup>4</sup> EB-2024-0111, Rebasing and IRM – Settlement Proposal (November 4, 2024), Exhibit N, Tab 1, Schedule 1, p. 26.

<sup>5</sup> EB-2025-0064, Rate Order.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, p. 3 & Exhibit C, Tab 2, Schedule 1

Preamble:

QRAM evidence states: *As a result of these conditions, Enbridge Gas experienced higher than forecast customer demands and purchased more than 45 PJ of incremental natural gas supply at Dawn on behalf of sales service customers in all rate zones. Due to the timing of these transactions and, as the 2025/2026 winter season is not yet complete, a detailed reconciliation of the drivers of incremental gas supply volumes and explanation of cost/account impacts by rate zone will be included in the Company's July 2026 QRAM evidence.*

We understand the rebasing proceedings have brought changes to gas supply and load balancing. In this set of questions and those on the next page. We would like to understand better the principles behind the determination of and allocation of the costs to customers for the incremental purchases.

Question:

Given recent reliance on 2018 GSP volumes during the latest deferred rebasing term and Phase 2 adjustments market-based storage:

- a) Did EGI make operating adjustments to its utilization of storage and Dawn delivered purchases in its Operating plan for the 2025/26 winter.
  - i) If so, please provide the determination of and resulting adjustments

Response:

As discussed in the Company's 2026 Annual Gas Supply Plan Update<sup>1</sup>, effective for the 2025/26 gas year, Enbridge Gas adjusted its storage portfolio for changes resulting

---

<sup>1</sup> EB-2026-0092, 2026 Annual Gas Supply Plan Update, pp. 22-24.

from the OEB-approved 2024 Rebasing Phase 2 Settlement Agreement, including total storage space of 217.7 PJ (reducing market-based storage from 26 PJ to 18 PJ), the establishment of storage injection and withdrawal limits for cost-based storage, and the management of operational contingency.<sup>2</sup>

- Enbridge Gas reduced the amount of market-based storage within its portfolio to 17 PJ in April 2025 by electing not to renew a portion of expiring contracts. Although the 2024 Rebasing Settlement Agreement set market-based storage at 18 PJ, Enbridge Gas elected to procure 1 PJ less in 2025/26 and, alternatively, procured 1 PJ of additional Dawn supply during the 2025/26 winter season instead. These changes resulted in increased planned winter supply purchases and reduced planned summer supply purchases.
- Enbridge Gas's 2025/26 gas supply plan reflects established maximum firm storage withdrawal and injection capabilities available to in-franchise customers of 4.0 PJ/day and 1.7 PJ/day, respectively. Demands at Dawn exceeding those volumes during the 2025/26 winter season required Enbridge Gas to purchase incremental supply or services (including incremental Dawn supply).
- Enbridge Gas's 2025 gas supply plan reflects established operational contingency of 15.6 PJ, managed using inventory targets throughout the gas year.

Aside from these adjustments, Enbridge Gas maintained its approach to the utilization of storage (including the February 28<sup>th</sup> storage inventory target) and Dawn supply purchases during the 2025/26 winter season.

---

<sup>2</sup> EB-2024-0111, Exhibit N, Tab 1, Schedule 1, pp. 9-10.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, p. 3 & Exhibit C, Tab 2, Schedule 1

Preamble:

QRAM evidence states: *As a result of these conditions, Enbridge Gas experienced higher than forecast customer demands and purchased more than 45 PJ of incremental natural gas supply at Dawn on behalf of sales service customers in all rate zones. Due to the timing of these transactions and, as the 2025/2026 winter season is not yet complete, a detailed reconciliation of the drivers of incremental gas supply volumes and explanation of cost/account impacts by rate zone will be included in the Company's July 2026 QRAM evidence.*

We understand the rebasing proceedings have brought changes to gas supply and load balancing. In this set of questions and those on the next page. We would like to understand better the principles behind the determination of and allocation of the costs to customers for the incremental purchases.

Question:

Please summarize all changes in protocol that EGI made in executing the Gas Supply plan for operational reasons that are different from how the winter operations would have been conducted prior to 2024.

- a) Please include the rationale or appropriate approvals of those changes with evidentiary references.

Response:

Please see the response at Exhibit I-FRPO.3.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Ex. B, Tab 1, Sch. 1. P.3, Ex. C, Tab 2. Sch. 2 & EB-2022-0150 Ex.I.FRPO.2

Preamble:

The first reference is the quoted reference about the Jul 2026 QRAM. The third reference is from the July 2022 Q3 QRAM proceeding wherein we were trying to understand the principles and process behind cost allocation between commodity and load balancing in EGD rate zone.

Question:

Please summarize all changes protocol that EGI made in performing the allocation of costs to commodity, transportation and load balancing since the 2022 answers that outline the approach at the time.

- a) Please include the rationale or appropriate approvals of those changes with evidentiary references.
- b) Given all the above determination of costs and classification to various components, do both system gas and direct purchase customers pay for the incremental load balancing? Please explain fully.

Response:

- a) Enbridge Gas continues to follow the OEB-approved methodology to allocate costs between commodity, transportation, and load balancing that has been in place for the EGD rate zone since prior to EB-2008-0106. No changes have been reflected in the April 2026 QRAM.
- b) Yes. The Company provides load balancing to system gas and direct purchase customers in the EGD rate zone. To the extent that the actual price of load balancing supplies is different than the forecast price, the price variance is recorded in the load

balancing component of the Purchased Gas Variance Account (PGVA). The load balancing component of the PGVA is disposed to both system gas and direct purchase customers.

The cost consequences of the incremental purchases will be addressed in the July QRAM once a reconciliation of drivers and an analysis of costs impacts by rate zone has been determined.

ENBRIDGE GAS INC.

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

Interrogatory

Reference:

Ex. B, Tab 1, Sch. 1. P.3, Ex. C, Tab 2. Sch. 2  
EB-2022-0150 Ex.I.FRPO.2

Preamble:

The first reference is the quoted reference about the Jul 2026 QRAM. The third reference is from the July 2022 Q3 QRAM proceeding wherein we were trying to understand the principles and process behind cost allocation between commodity and load balancing in EGD rate zone.

Question:

Given that EGI is not going to provide evidence for the drivers of incremental gas supply volumes and explanation of cost/account impacts by rate zone until the July QRAM, please provide EGI's views on the pros/cons and rationale behind making the resulting QRAM generated rates interim until the evidence is properly filed and reviewed. Please explain fully.

Response:

In the current QRAM application, there has been no change to the OEB-approved methodology for the determination of costs and variances and associated cost allocation. Furthermore, there has been no change to the practice of updating market pricing only for the last two months of PGVA account balances within QRAM applications and reflecting the third last month as final. Within the April 2026 QRAM application, April 2025 through to, and including, January 2026 are final reflecting actual balances. February and March 2026 balances will be updated in the July 2026 QRAM application. As noted in the response at Exhibit I-FRPO.2, a detailed reconciliation of drivers of incremental gas supply volumes and determination of cost consequences by rate zone for the 2025/26 winter season has not yet been completed. As such, Enbridge Gas will provide explanation(s) of drivers and cost consequences by rate zone as part of its July 2026 QRAM application.

In Phase 1 of Enbridge Gas's 2024 Rebasing proceeding<sup>1</sup>, the OEB approved the establishment of interim 2024 rates to reflect that the 2024 Rebasing proceeding is being conducted in phases and that certain interim 2024 rates may be further adjusted, as of January 1, 2024, to reflect the full impacts of determinations to be made in Phase 2 of the proceeding. In Phase 2 of Enbridge Gas's 2024 Rebasing proceeding<sup>2</sup>, the OEB approved 2025 rates on an interim basis until the remaining Phase 2 issues and applicable Phase 3 of Enbridge Gas's 2024 Rebasing proceeding<sup>3</sup> issues are resolved. Likewise, and while there has been no change to the OEB-approved QRAM methodology for the determination of costs, price variances, cost allocation and rate design, this QRAM Application is therefore being considered for approval on an interim basis.

---

<sup>1</sup> EB-2022-0200.

<sup>2</sup> EB-2024-0111.

<sup>3</sup> EB-2024-0064.