VIA RESS and EMAIL

October 8, 2026

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

Dear Ritchie Murray:

Re: EPCOR Natural Gas Limited Partnership (EPCOR)
2027 Rates – Southern Bruce – Phase 1
Consumers Council of Canada (CCC) Interrogatories
OEB File No. EB-2026-0149

In accordance with Procedural Order No. 1, dated September 18, 2026, please find attached CCC's interrogatories with respect to Phase 1 of EPCOR's 2027 rates application for its Southern Bruce service area.

Yours truly,

Lawrie Gluck

Lawrie Gluck
Consultant for the Consumers Council of Canada

cc: All parties in EB-2026-0149

EPCOR Natural Gas Limited Partnership

2027 Rates - Southern Bruce – Phase 1

Consumers Council of Canada

Interrogatories

October 8, 2026

CCC-1
Ref: Application, July 31, 2026, p. 15

Preamble:

For a number of the DVAs, EPCOR proposes to recover the balance from customers through the implementation of a 12-month variable-rate rate rider commencing January 1, 2027, using 2025 normalized annual consumption (Rates 1, 6) and 2025 billed volumes (Rate 11) as the basis for calculation.

Question(s):

Please explain why EPCOR proposes to use 2025 normalized annual consumption as opposed to 2027 forecast consumption as the basis for determining certain rate riders. As part of the response, please advise whether this is a change from prior practice.

CCC-2
Ref: Application, July 31, 2026, pp. 26-29

Question(s):

a) Please provide a single table that shows the following for each year that the UFGVA was disposed (e.g., 2019-2025):

    i. Total annual volumes

ii. Total UFG
iii. UFG as a percent of total annual volumes

b) Please provide the overall conclusion (and any related recommendations) resulting from the assessment that was undertaken to determine the cause of UFG.

c) Please further explain the CNG volume validation and provide the result of the "cross-check" that was completed with respect to trailer counts and invoiced volumes.

CCC-3

Ref: Application, July 31, 2026, pp. 33-36
Application, July 31, 2026, S&TVA Supporting Excel Spreadsheet
Application, July 31, 2026, p. 17
EB-2025-0178, Interrogatory Responses, OEB Staff-3c, p.12
EB-2025-0178, Interrogatory Responses, OEB Staff-5(d), p. 21

Preamble:

In response to OEB Staff-3(c) in EB-2025-0178, EPCOR stated:

As the Upstream Charges times the actual volumes are not sufficient to cover the upstream costs, the balance will continue to accumulate until storage and transportation and upstream charges are updated to reflect the increase in costs along with the lower than anticipated volumes. ENGLP anticipates requesting updates to the storage/transportation and upstream charges in next year's filing after the initial disposition has taken place.

In response to OEB Staff-3(d) in EB-2025-0178, EPCOR stated:

For future years, ENGLP proposes to use a hybrid approach. For the upstream recovery, ENGLP proposes to maintain the usage of approved interest rate for long term debt (3.72%) and for the transportation and storage recovery, ENGLP proposes to use the prescribed interest rates posted on the OEB's website which is approved in the generic cost of service decision and order EB-2024-0063.

Question(s):

a) Please advise whether EPCOR is seeking changes to its storage/transportation rate and upstream charges in the current proceeding.

b) Please confirm that, in the absence of updating the storage/transportation rate, the outcome will likely be to record material debit balances in the 2027 S&TVA (and later years), which attract interest at EPCOR's long-term debt rate.

c) Please provide the revised balance for disposition in the S&TVA (along with a comparison to the proposed balance) based on the "hybrid approach" for the interest calculation that EPCOR proposed in EB-2025-0178.

d) Please explain the basis for applying different allocators to each of the CIACVA and the upstream recovery portion of the S&TVA and the TVA. More specifically, the CIACVA is allocated based on "CIP distribution and non-distribution rate base," while the upstream recovery portion of the S&TVA and the TVA is allocated based on the CIP rate base associated with the Enbridge CIAC. As part of the response, please advise whether EPCOR agrees that the Enbridge CIAC allocator is more closely aligned with the cost variances being tracked in both accounts.

e) Please provide the allocation of the CIACVA balance using the CIP rate base associated with the Enbridge CIAC (for all rate classes).

f) With respect to the CNG costs incurred, please provide table(s) showing:

   i. The monthly and annual CNG costs incurred in each year since CNG was initially acquired.

   ii. The monthly and annual CNG volumes purchased in each year since CNG was initially acquired.

   iii. The annual breakdown of CNG costs between rental, commodity, etc. for each year since CNG was initially acquired. Please include a description of each category of costs.

g) Please provide detailed reasons for the increased CNG costs incurred in 2025 relative to 2024.

h) Please explain why CNG purchases are required only between October and December. As part of the response, please discuss whether customers in a specific rate class are driving the requirement for CNG purchases.

i) With respect to the existing storage and transportation rate, please advise what cost categories (i.e., storage, transportation, nomination, gas supply, CNG) were reflected in the derivation of those rates. As part of the response, please further explain what costs are reflected in the nomination and gas supply categories.

j) Please provide a table showing the 2025 actual monthly volumes for each of Rate 1, 6 and 11.

CCC-4
Ref: Updated Application, September 24, 2026, p. 7

Question(s):

Please advise whether EPCOR intends to apply interest charges to the UFGVA, S&TVA, and TVA as part of the proposal to dispose of these accounts over 24 months instead of 12 months. If so, please advise whether the Company's calculations of the relevant rate riders and related bill impacts reflect the inclusion of those additional carrying charges.