

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: Enbridge Gas Inc. (Enbridge Gas)
2025 Utility Earnings and Deferral and Variance Account Disposition
Consumers Council of Canada (CCC) Interrogatories
OEB File No. EB-2026-0108**

In accordance with Procedural Order No. 1, dated September 17, 2026, please find attached CCC's interrogatories with respect to Enbridge Gas's 2025 Utility Earnings and Deferral and Variance Account Disposition proceeding.

Yours truly,



Lawrie Gluck
Consultant for the Consumers Council of Canada

cc: All parties in EB-2026-0108

Enbridge Gas Inc.
2025 Utility Earnings and Deferral and Variance Account Disposition
Consumers Council of Canada
Interrogatories
October 8, 2026

CCC-1

Ref: Exhibit B, Tab 1, Schedule 1, p. 4
Exhibit B, Tab 1, Schedule 5, p. 4
Exhibit B, Tab 3, Schedule 1, p. 3

Question(s):

- a) Please further describe the depreciation error that was identified in Q2 2026.
- b) Please advise precisely where the depreciation error-related adjustments were made in Exhibit B, Tab 1, Schedule 5 (Continuity of Accumulated Depreciation).
- c) Please explain the overall impact (including both the increase to PP&E and decrease to depreciation expense) of the correction to the depreciation error on the earnings sharing calculation.

CCC-2

Ref: Exhibit B, Tab 1, Schedule 3, p. 1
Exhibit C, Tab 2, Schedule 12, p. 3 and Appendix 1, p. 1

- a) Please explain the “2025 TVDA adjustment to reflect retroactive Bill C-15 enacted in 2026” adjustment referenced in Exhibit B, Tab 1, Schedule 3.
- b) Please further explain the statement that RII property is not subject to the half-year rule (Exhibit C, Tab 2, Schedule 12, p. 3) and explain the implications of this

treatment on the adjustment made to the earnings sharing calculation. As part of the response, please advise whether the half-year rule was applied for CCA purposes when establishing base rates.

CCC-3

Ref: Exhibit B, Tab 3, Schedule 1, p. 3

Preamble:

Compensation and Benefits (line 1) decreased by \$105.4 million, primarily driven by the absence of \$48.3 million in one-time 2024 severance costs and a \$37.0 million reduction in pension expense.

Question(s):

Please explain the driver of the remaining approximate \$20 million decrease to compensation and benefit costs.

CCC-4

Ref: Exhibit B, Tab 3, Schedule 1, p. 3

Preamble:

Professional and Regulatory Services (line 4) increased by \$17.0 million, mainly due to (i) \$10.0 million external consulting costs, and (ii) \$10.0 million of affiliate flowthrough costs, fully recoverable through Internal Allocations and Recoveries (line 11).

Question(s):

Please further describe the “affiliate flow-through costs” and explain why these affiliate-related costs are driving increased regulated costs that form part of the earnings sharing calculation.

CCC-5

Ref: Exhibit C, Tab 2, Schedule 8, p. 3
EB-2025-0155, Exhibit I.CCC-1

Question(s):

Please provide updated versions of Tables 1 and 2 to EB-2025-0155, Exhibit I.CCC-1 showing the calculation of the 2025 regulated and unregulated facility-related obligation cost allocations.

CCC-6

Ref: Exhibit C, Tab 2, Schedule 10, p. 3
EB-2025-0155, Exhibit I.CCC-2

Question(s):

Please provide an updated version of Table 1 to EB-2025-0155, Exhibit I.CCC-2 showing the calculation of the 2025 carbon charge-related bad debt. As part of the response, please advise whether any methodological changes were made to the determination of the balance in the account.

CCC-7

Ref: Exhibit C, Tab 2, Schedule 15, Attachment 1
Exhibit B, Tab 1, Schedule 3, p. 1

Question(s):

Please explain how the 2025 PTUVA credit of \$49.0 million is treated from an earnings sharing perspective (including a reference to where it is reflected in the earnings sharing calculation). As part of the response, please also advise whether ratepayers receive a share of the amount retained by Enbridge Gas in 2025 through the application of the \$10 million deadband.

CCC-8

Ref: Exhibit C, Tab 2, Schedule 20, pp. 1-3 and Attachment 1

Preamble:

This account records 50% of the grossed-up after-tax gain/loss resulting from the disposition of non-depreciable land.

Enbridge Gas allocates proceeds between land and building based on independent broker evaluations or comparable valuation evidence that reflects the fair value of each component within the overall transaction on a sale by sale basis. Broker evaluations provide an objective, market-based assessment of the relative value of land and building components.

Proceeds from the disposition of depreciable assets such as buildings will be 100% to the benefit of ratepayers and the gain/loss is reflected in the combined balances of accumulated depreciation and the Site Restoration Cost Variance Account and are beyond the scope of this deferral account.

Question(s):

- a) Please confirm that this is the first year that the DPDA has recorded a balance for disposition.
- b) Please further explain the methodology used to pass-through to ratepayers 100% of the benefit of proceeds from the disposition of depreciable property (as between assignment to accumulated depreciation and the SRCVA). As part of the response, using Stratford (Attachment 1 / Column (g)) as an example, explain the accounting of the sale proceeds as between: (i) the DPDA for land; and (ii) accumulated depreciation and the SRCVA for the related building. Please also provide a reference to where in the application the proceeds from the Stratford building sale are shown.
- c) For each sale listed in Attachment 1, please provide documentation (i.e., broker evaluations or comparable valuation evidence) supporting the allocation of sale proceeds between land and buildings.

CCC-9

Ref: EB-2025-0064, Exhibit 2, Tab 7, Schedule 2
EB-2025-0064, Exhibit I.2.7-CCC-2
Exhibit G, Tab 1, Schedule 3, pp. 16-18

In EB-2025-0064 at Exhibit I.2.7-CCC-2, Enbridge Gas stated that it intends to develop a plan for large-scale AMI implementation, but that plan will be influenced (and could be changed) by the results of the Proof of Concept (POC).

Enbridge Gas also confirmed that it will provide details of its plans for large-scale AMI deployment to the OEB at or before the time that the Company proceeds with any such project.

In the current proceeding, Enbridge Gas stated that it may file an application or request an exemption from the MRPM target for 2026 and beyond as the Company continues with its implementation of AMR and ERT technologies and its AMI implementation plan.

In addition, Enbridge Gas noted that more than 148,000 AMR meters have been installed since January 2025, with deployment prioritized in areas experiencing known accessibility challenges.

Question(s):

- a) Please advise whether the AMI POC has been completed. If not, please provide the expected completion date. If so, please provide the findings resulting from the POC and the cost-benefit analysis that Enbridge Gas stated “will be completed by the end of the POC.”¹
- b) Please advise whether the AMI implementation plan has been completed. If so, please file documentation associated with the implementation plan on the record.
- c) If the AMI implementation plan is not yet completed, please provide any initial details regarding AMI implementation including the forecast cost, the forecast cost per meter, the number of meters to be installed, and potential timing.
- d) Please advise whether the installation of 148,000 AMR meters forms part of the Company’s AMI implementation plan. If not, please explain.

¹ EB-2025-0064, Exhibit 2, Tab 7, Schedule 2, p. 8.

- e) Please provide the costs (broken down between capital and operational costs) associated with the installation of 148,000 AMR meters. As part of the response, please confirm that the costs associated with the installation of these meters is reflected in the earnings sharing calculation.
- f) Please provide additional details regarding the need for the installation of 148,000 AMR meters. As part of the response, please advise:
- whether these meters were installed as replacements for existing meters (or installed for new customers)
 - whether the existing meters were at the end of useful life
 - whether the existing meters were damaged or otherwise unusable

CCC-10

Ref: Exhibit G, Tab 5, Schedule 1, pp. 9-12 and Appendix 3

Preamble:

For 2025, forecast Dawn supply purchase costs were classified between system commodity costs, transportation, and load balancing costs (split between peaking and seasonal). The Empress reference price, inclusive of fuel, is applied to forecast Dawn and peaking supply purchase volumes to classify a proportion of these purchase costs as system commodity supply. Any forecast price premium for gas supply purchases at Dawn over the Empress reference price is attributed to the transportation and load balancing (peak and seasonal) classification in the same proportion as the amount included in rates (20% deemed transportation, 71% load balancing - seasonal, and 9% load balancing - peak).

There is no approved methodology for the EGD rate zone to determine a classification split of actual Dawn and peaking supply purchases. Supply purchases variances are recorded as commodity and load balancing variances within the PGVA components.

The variance between the forecast and actual price differential of Empress supply and Dawn supply is applied to actual Dawn supply purchases each month plus the variance between forecast and actual peak costs and load balancing fees is recognized as the load balancing variance in the PGVA. Actual load balancing variance costs for 2025 was a debit

to ratepayers of \$40.1 million as provided at Appendix 3. Load balancing variance costs are allocated to each customer class in the same manner as the allocation of load balancing costs in rates.

Question(s):

a) Please confirm, or correct, our understanding of Enbridge Gas's load balancing cost allocation methodology for the EGD Rate Zone:

- On a forecast basis, the premium for gas supply purchases at Dawn relative to the Empress price is classified as transportation (20%) and load balancing (80%) (i.e., 71% seasonal and 9% peak).
- When truing-up variances in the PGVA, the variance in the premium for gas supply purchases at Dawn relative to the Empress price (plus other direct load balancing costs) is classified entirely as load balancing (with no allocation to transportation).

If the above is correct, as part of the response, please explain the reason for what appears to be different allocations applied for forecasted costs and for the true-up to actual costs.

b) If the above understanding is correct, please provide the rate class allocations (in dollars and percentages) for 2025 in the following scenarios:

- i. The forecast load balancing and transportation costs in rates (Table 2) using the existing approach
- ii. The forecast load balancing and transportation costs in rates (Table 2) using the PGVA true-up approach
- iii. The PGVA true-up (Appendix 3) using the existing approach
- iv. The PGVA true-up (Appendix 3) using the same approach as is applied to the forecast load balancing costs in rates (i.e., with a portion of the costs being allocated to transportation).