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October 8, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

**RE: EB-2026-0108 Enbridge Gas 2025 Utility Earnings and Disposition of DVA Balances
Interrogatories of Energy Probe**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) on the EB-2026-0108 Enbridge Gas 2025 Utility Earnings and Disposition of DVA Balances application.

Submitted on behalf of Energy Probe.

Tom
Ladanyi

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EB-2026-0108

Enbridge Gas 2025 Utility Earnings and Disposition of DVA Balances

Interrogatories of Energy Probe

October 8, 2026

C-EP-1

References: Exhibit C, Tab 2, Schedule 3, Page 2, *Table 1 Historical UFG Volumes for EGI Regulated*; Exhibit G, Tab 1, Schedule 3, Page 9, *Figure 2: Number of Estimate Bills per Month* and *Figure 3: Percentage of Estimated Bills vs Total Customers*

Preamble: “Figure 1 shows historical UFG volumes for Enbridge Gas from 2013 to 2025 and includes the 2024 OEB-approved UFG volume forecast.”

Questions:

- a) Please explain why the text quoted in the Preamble mentions Figure 1 but appears to refer to Table 1.
- b) If the 2024 UFG volume of 334,888 10 3 m3 is the 2024 OEB-approved UFG volume forecast what was the actual UFG for 2024?
- c) The UFG volumes increased from 2023 to 2025 as did the number of estimated bills. Does the number of estimated bills have any impact on UFG? Please explain your answer.
- d) What has Enbridge Gas done to reduce the volume of UFG in 2025? Please list all activities and explain why they were unsuccessful.
- e) What incentives are in place for Enbridge Gas to reduce UFG volumes?

C-EP-2

Reference: Exhibit C, Tab 2, Schedule 3, Page 4

Preamble: “Enbridge Gas’s total system (utility and non-utility) UFG in 2025 amounted to approximately 435,240 103m3 compared to total system throughput for that same year of approximately 56,875,530 103m3 (0.77%).”

Questions:

- a) Please explain how UFG was allocated between utility and non-utility volumes.
- b) Was the percentage of UFG volume the same for utility and non-utility volumes? Please explain your answer.

G-EP-3

Reference: Exhibit G, Tab 1, Schedule 3, Page 7 *Step 5: Automated or Manual Review (Implausible Reads)*

Preamble: “A meter reading may be identified as "implausible" when it differs significantly from the level of consumption expected for a particular customer during a billing period.

...As a result, a bill may be identified as estimated even though a meter reading was received. This occurs because the reading could not be validated at the time of billing and additional review was necessary to protect the customer from potential billing inaccuracies.”

Questions:

- a) What is the percent difference between actual reading and expected consumption used to identify a meter reading as implausible?
- b) Why does Enbridge Gas assume that the expected consumption is plausible, and the actual meter reading is implausible?
- c) Is Enbridge Gas aware that some customers are replacing their old gas furnaces with heat pumps and that could make the estimated consumption based on the old gas furnace implausible?
- d) How many months are there between billing and additional review?
- e) How are customers protected from estimated bill inaccuracies?

G-EP-4

Reference: Exhibit G, Tab 1, Schedule 3, Page 8, *Section 3.4 Estimated Billing Volumes and Trend*

Preamble: “Because Enbridge Gas uses a bi-monthly meter reading model, estimated billing is an expected and recurring component of normal operations.”

Question:

For a customer who has replaced an old gas furnace with a hybrid heat pump system and uses less gas does that mean that every second month the bill is based on consumption of the old gas furnace even if the customer provides the actual meter reading to Enbridge?

G-EP-5

Reference: Exhibit G, Tab 1, Schedule 3, Page 9, *Figure 2: Number of Estimate Bills per Month and Figure 3: Percentage of Estimated Bills vs Total Customers*

Questions:

- a) Figure 2 indicates that the number of estimated bills per month has increased from 2023 to 2025. Please explain why.
- b) Figure 3 indicates that the percentage of estimated bills vs total customers has increased from 2023 to 2025. Please explain why.
- c) Please expand Figures 2 and 3 to show 2020 and 2021.
- d) Should the OEB be concerned about the increased trend in estimated bills? If the answer is no, please explain why not.

G-EP-6

Reference: Exhibit G, Tab 1, Schedule 3, Page 10, *Section 3.5.1 Enhanced Review of Implausible Meter Readings*

Preamble:

“As part of its ongoing continuous improvement efforts, Enbridge Gas has identified opportunities to further strengthen the review and validation of implausible meter readings before billing adjustments are applied.

Enhancements under review or development include additional safeguards that evaluate:

- historical customer consumption patterns;
- previous actual meter readings;
- seasonal usage trends;
- account characteristics; and
- other relevant customer information “

Questions:

- a) Why is Enbridge only concerned about implausible meter readings but not about implausible estimated consumption of gas?
- b) How many years of historical customer consumption patterns are currently used in the estimation process?
- c) Are all years of historical consumption given the same weighing or are more recent consumption patterns given higher weighing?
- d) Are only actual readings used for historical consumption patterns?
- e) Considering that many residential customers are switching to hybrid heat pump systems which reduce gas consumption, how is that used in the historical consumption pattern data?

G-EP-7

Reference: Exhibit G, Tab 1, Schedule 3, *Section 3.5.2 Reduced Automated Re-Estimation*
Pages 10 and 11

Preamble:

“Enhancements are being implemented to reduce circumstances where actual meter readings may be subsequently replaced through automated estimation processes.

Under the revised approach, the system will only automatically re-estimate one actual meter reading within a six-month period, providing additional protection against unnecessary replacement of actual consumption information.

For example, if an actual meter reading appears inconsistent with historical consumption patterns, the SAP CIS system may automatically replace the actual meter reading with an estimated reading. Any subsequent actual meter reading for the same account that requires further review within the next six months will be reviewed manually rather than automatically replaced with another estimate. This increases the number of actual meter readings retained in the billing record and reduces the use of estimated consumption data.”

Questions:

- a) For a customer who has replaced an old gas furnace with a hybrid heat pump system and uses less gas, why would re-estimating one actual meter reading provide additional protection against unnecessary replacement of actual consumption information if the re-estimated meter reading is based on consumption of the old gas furnace?
- b) How many actual meter readings were reviewed manually in 2025?
- c) Of the actual meter readings that were reviewed how many were found to indicate lower consumption of gas than the estimated consumption based on historical data?
- d) In cases where a customer has been overcharged for several months based on estimated consumption of gas and Enbridge credits the customer’s account, does that credit include interest? If the answer is yes, what interest rate is applied? If the answer is no, why not?
- e) Is the manual review performed by employees of Enbridge Gas or is it performed by individuals working for a contractor?
- f) If the manual review is performed by the contractor, how does Enbridge Gas ensure that it is done correctly?