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VIA RESS and EMAIL

September 4, 2025

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

Dear Ritchie Murray:

Re: EB-2025-0065 – Enbridge Gas Inc. (Enbridge Gas)
5-Year Gas Supply Plan – Interrogatory Responses

In accordance with the OEB's Procedural Order No. 1 dated July 9, 2025, enclosed please find the interrogatory responses of Enbridge Gas.

In accordance with the OEB's Practice Direction on Confidential Filings, Enbridge Gas is requesting confidential treatment of the following information. Details of the specific confidential information for which confidential treatment is sought are set out below:

Exhibit	Brief Description	Basis for Confidentiality
Exhibit I.4-SEC-9 – Attachment 1	The confidential information that is redacted relates to identification of counterparties and volume and pricing information.	This is non-public information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party.[1] If published, this information could provide advantages to bidders and suppliers in future transactions and prejudice Enbridge Gas's competitive position in negotiating future supply arrangements.

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

[1] These are noted as items #1 and 2 in the "Categories of Information that Will Presumptively Be Considered Confidential", as found at Appendix B to the OEB's Practice Direction on Confidential Filings.

Sincerely,

Richard Wathy

Richard Wathy
Technical Manager, Regulatory Applications

cc: David Stevens, Aird & Berlis LLP
EB-2025-0065 - Intervenors

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

1

Reference:

GSP, p. 64

Question(s):

a) If available, please provide a breakdown of natural gas supply purchases between: (i) Canadian origin supply shipped to Enbridge through Canada; (ii) Canadian origin supply shipped to Enbridge through the US; and (iii) US origin natural gas.

b) In terms of plan execution, please discuss the options that Enbridge Gas has available to increase the purchases of Canadian origin natural gas.

Response:

a) Using the assumptions below, please see Table 1 for an estimate of planned 2024/25 natural gas supply purchase volumes based on country of origin and transportation path.

Table 1
Planned Natural Gas Supply Purchases Based on Country of Origin

Line No.	Supply Source	2024/25 (TJ)	Percentage
	(a)	(b)	(c)
1	Canadian origin supply shipped through Canada	227,168	42.8%
2	Canadian origin supply shipped through U.S.	14,395	2.7%
3	U.S. origin supply	289,719	54.5%
4	Total Supply[1]	531,283	100%

Natural gas from a variety of sources is intermingled across North America's integrated natural gas system and it is not possible to track the origin of individual molecules. For the purpose of estimating the national origin of natural gas supply purchases, the Company made the following simplifying assumptions, but recognizes the actual percentages could be different than the assumptions used:

- Natural gas supply purchases at AECO and Empress are assumed to be entirely Canadian origin. AECO and Empress are both located in Alberta and are closely tied to Western Canadian Sedimentary Basin (WCSB) production.
- Similarly, Ontario production is assumed to be entirely Canadian origin.
- Natural gas supply purchases at Dawn as well as peaking supplies are assumed to be either Canadian origin or U.S. origin volumes that have already had any tariff costs applied upon import and delivery to Dawn/Ontario by shippers. As a result, Enbridge Gas has included these purchases as "Canadian origin supply shipped through Canada".
- Natural gas supply purchases from Alberta transported on GLGT to Dawn and on TCPL/CTHI/CPMI to the Union MDA and Union SSMDA are categorized as "Canadian origin supply shipped through U.S.".
- All other natural gas supply purchases are of U.S. origin.

b) Absent the availability of incremental capacity to transport natural gas volumes produced in western Canada to Ontario, Enbridge Gas has very few options to increase purchases of Canadian origin natural gas at this time. Please see response at Exhibit I.2-STAFF-5, part a) and Exhibit I.2-STAFF-10, part b) for discussion of transportation capacity scarcity and the limited options available to Enbridge Gas to address it.

[1] EB-2025-0065, Table 10, p.50.

While Enbridge Gas could increase purchases at Dawn to avoid directly paying tariffs on U.S. origin natural gas supply, some portion of Dawn supply would likely still be U.S. origin in nature and thus subject to tariffs upon import and delivery. In other words, while Enbridge Gas itself could avoid directly paying tariffs by increasing Dawn purchases, a portion of its suppliers at Dawn (approximately 60%) would be required to pay tariff costs and would likely seek to pass on some portion of these costs to their customers (including Enbridge Gas).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Canadian Manufacturers & Exporters (CME)

Interrogatory

Issue:

1

Reference:

EB-2025—0065 Enbridge Gas 5-Year Gas Supply Plan, p. 64

Question(s):

At page 64, EGI discussed its response to tariff threats from the United States and potential retaliatory tariffs from Canada.

(a) Please confirm whether, besides a heightened awareness of potential issues in the future, whether the imposition of US tariffs and the potential of matching Canadian tariffs caused EGI to make any different decisions with respect to any actual supply options in the gas supply plan. If yes please describe the changes. If not, please explain why not.

(b) Similar to a) above, did the imposition of tariffs or the potential for reciprocal tariffs impact EGI's evaluation of any supply options even if ultimately EGI still decided to move ahead with those options. For instance, did any source of supply get a lower rating for security of supply as a result of being potentially subject to tariffs? If yes, please advise which ones. If not, please explain why not.

Response:

a-b) No, Enbridge Gas's gas supply plan, planning practices, and related decisions were not influenced by threats of or the imposition of U.S. tariffs or reciprocal Canadian tariffs. No material tariffs have applied to volumes procured or shipped by Enbridge Gas to date.

As explained in the 5-Year Gas Supply Plan, Enbridge Gas holds a diverse portfolio of transportation services (in terms of transportation path and contract term) to reduce risk exposure to long-term variation in demand/supply, and short-term supply

constraints and/or price spikes.[1] Similarly, the Company's monthly procurement plans layer in a variety of annual, seasonal, and monthly purchases as well as certain short-term purchases to provide flexibility to adjust for variation to forecast or market volatility.[2]

[1] EB-2025-0065, p.31.
[2] Ibid, p.79.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

1

Reference:

2025 GSP, p.5

Preamble:

EGI evidence states: ***Cost-effectiveness*** *– If the supply/service option is intended to satisfy average day needs, Enbridge Gas will evaluate it based on landed costs (i.e. $/GJ/d). If the option is intended to meet design day needs, annual costs (i.e. $/GJ/yr) are calculated*.

We would like to understand better EGI's views on the measures of cost effectiveness for the purpose of comparison.

Question(s):

Please describe fully the determination of:

a) The landed cost to satisfy average day's needs. Please ensure the description specifies all of the cost components and how the daily cost is derived including:
    i) Transportation demand charges
    ii) Transportation commodity charges
    iii) Fuel gas
    iv) Load balancing, including:
        (1) Transportation to and from storage
        (2) Fuel gas associated with those transfers
        (3) Storage related charges

b) The annual cost to meet design day's needs. Please ensure the description specifies all of the cost components and how the annual cost is derived including:
    i) Transportation demand charges
    ii Transportation commodity charges
    iii) Fuel gas

iv) Load balancing, including:
(1) Transportation to and from storage
(2) Fuel gas associated with those transfers
(3) Storage related charges

c) Please provide an Excel spreadsheet showing the derivation of these costs for customers in the:
i) EGD EDA
ii) Union North NDA
iii) Union North WDA

Response:

a) The landed cost analysis referenced has been provided to support incremental transportation contracting decisions since being agreed upon by Union Gas Limited and parties to its 2007 Rates proceeding.[1] Landed cost analysis is intended to provide a directly comparable daily cost-per-unit of capacity measure of multiple alternative pipeline transportation paths and related service options to address identified average day shortfall(s) in specific delivery areas.

i. Transportation Demand Charges – are based on the tolls set out in a pipeline company's tariff, open season document (for new capacity), or on a negotiated rate basis.

ii. Transportation Commodity Charges – are based on the tolls set out in a pipeline company's tariff, open season document (for new capacity), or on a negotiated rate basis.

iii. Fuel Gas – fuel ratios and related costs are based on either historical fuel ratios, or actual fuel ratios published by pipeline companies.

iv. Load Balancing – Enbridge Gas does not include load balancing costs in landed cost analysis as such costs are distinct from the other pipeline/service-related costs assessed and compared in that analysis. As discussed in response at Exhibit I.2-FRPO-3, Enbridge Gas's load balancing needs are dynamic and unique each season for each delivery area, depending on a variety of factors that are out of the Company's control, such as weather, customer consumption, and operating conditions.

[1] EB-2005-0520, Settlement Agreement, Appendix B.

Enbridge Gas calculates storage space required for in-franchise customer needs separately from pipeline decisions and this calculation is not influenced by transportation capacity decisions. Since storage costs are not a variable cost when making transportation contracting decisions, storage is excluded from the landed cost analyses.

In addition to transportation demand and commodity charges and fuel costs, landed cost analysis also includes commodity pricing at the proposed purchase point for the term of the contract that is being considered.

b) The annual cost analysis referenced is intended to provide a directly comparable annual cost-per-unit of capacity measure of multiple alternative pipeline transportation paths and related service options to address identified design day shortfall(s) in specific delivery areas for a period of four days per year.

   i. Transportation Demand Charges – are based on the tolls set out in a pipeline company's tariff, multiplied by the design day shortfall for the full year.[2]

   ii. Transportation Commodity Charges – are based on the tolls set out in a pipeline company's tariff, multiplied by the design day shortfall for four days.[3]

   iii. Fuel Gas – fuel ratios and related costs are based on historical fuel ratios, multiplied by the design day shortfall for four days.

   iv. Load Balancing – Enbridge Gas does not include load balancing costs in annual cost analysis as such costs are distinct from the other pipeline/service-related costs assessed and compared in that analysis. As discussed in response at Exhibit I.2-FRPO-3, Enbridge Gas's load balancing needs are dynamic and unique each season for each delivery area, depending on a variety of factors that are out of the Company's control, such as weather, customer consumption, and operating conditions.

Enbridge Gas calculates storage space required for in-franchise customer needs separately from pipeline decisions and this calculation is not influenced by transportation capacity decisions. Since storage costs are not a variable cost when making transportation contracting decisions, storage is excluded from the annual cost analyses.

[2] In the case of peaking services, the Transportation Demand charge represents the estimated demand charge costs.
[3] In the case of peaking services, the Transportation Commodity charge represents the estimated commodity charge costs.

In addition to transportation demand and commodity charges and fuel costs, annual cost analysis also includes commodity pricing at the proposed purchase point based on the average of the ten highest observed spot prices over the previous three winter seasons multiplied by the design day shortfall for four days.

c) Please see Attachment 1 for the landed cost analysis supporting Tables 19 and 20, which informs incremental costs for average day requirements. While completing this response, Enbridge Gas discovered an error in the calculation of landed costs causing the wrong series of gas year forecasted costs to be averaged. The average costs have been corrected in Attachment 1. An updated version of Table 20 will be filed under separate cover. None of the Average Cost/Customer Impact or other conclusions are changed and there are no other aspects of the Company's pre-filed evidence impacted by this error and its subsequent correction.

   i. Please see Attachment 2 for the annual cost analysis for the Enbridge EDA which supports Tables 13 and 14 and informs incremental costs for design day requirements.

   ii. Please see Attachment 3 for the annual cost analysis for the Union NDA which supports Tables 17 and 18 and informs incremental costs for design day requirements.

   iii. Please see Attachment 4 for the annual cost analysis for the Union WDA. As there was not a shortfall in the WDA this option analysis has no cost impact and therefore was not included with pre-filed evidence.

Average Day Analysis

Route (A)	Point of Supply (B)	Basis Differential $US/mmBtu (C)	Supply Cost $US/mmBtu (D) = NYMEX + C	Unitized Demand Charge $US/mmBtu (E)	Commodity Charge $US/mmBtu (F)	Fuel Charge $US/mmBtu (G)	100% LF Transportation Inclusive of Fuel $US/mmBtu (I) = E + F + G	Landed Cost $US/mmBtu (J) = D + I	Landed Cost $Cdn/G (K)	Point of Delivery (L)	Comments
Dawn	Dawn	-0.0413	3.2371				0.0000	$3.24	**$4.14**	Dawn	
TCPL: Great Lakes to Dawn	Empress	-0.8477	2.4307	0.53	0.03	0.0939	0.6489	$3.08	**$3.94**	Dawn	
MichCon: MichCon to Dawn	SE Michigan	-0.1286	3.1498	0.17	0.00	0.0315	0.2060	$3.36	**$4.30**	Tecumseh	
Vector: Chicago to Dawn	Chicago	-0.1296	3.1488	0.16	0.00	0.0986	0.2603	$3.41	**$4.36**	Dawn	
Panhandle: Panhandle FZ to Dawn	Panhandle Field Zone	-0.2483	3.0301	0.50	0.05	0.0448	0.5894	$3.62	**$4.63**	Dawn	
NEXUS-Clar to Dawn	Dominion South Point	-0.7570	2.5214	1.13	0.00	0.0698	1.2053	$3.73	**$4.77**	Dawn	
Rover to Dawn	Dominion South Point	-0.7570	2.5214	0.98	0.05	0.0154	1.0449	$3.57	**$4.56**	Dawn	
TC: Niagara to Dawn	Niagara	-0.3841	2.8943	0.17	0.00	0.0133	0.1829	$3.08	**$3.94**	Dawn	

Supply Assumptions used in Developing Transportation Contracting Analysis:

Annual Gas Supply & Fuel Ratio Forecasts	Point of Supply Col (B) above	Nov 2024 - Oct 2025	Nov 2025 - Oct 2026	Nov 2026 - Oct 2027	Nov 2027 - Oct 2028	Nov 2028 - Oct 2029	Average Annual Gas Supply Cost $US/mmBtu Col (D) above	Fuel Ratio Forecasts Col (G) above
Henry Hub	**Henry Hub**	**$ 3.14**	**$ 3.26**	**$ 3.20**	**$ 3.27**	**$ 3.52**	**$ 3.28**	
Dawn	Dawn	$ 3.00	$ 3.15	$ 3.19	$ 3.29	$ 3.55	**$ 3.24**	
TCPL: Great Lakes to Dawn	Empress	$ 2.06	$ 2.17	$ 2.41	$ 2.59	$ 2.91	**$ 2.43**	3.86%
MichCon: MichCon to Dawn	SE Michigan	$ 2.92	$ 3.05	$ 3.10	$ 3.21	$ 3.47	**$ 3.15**	1.00%
Vector: Chicago to Dawn	Chicago	$ 2.93	$ 3.05	$ 3.10	$ 3.21	$ 3.45	**$ 3.15**	3.13%
Panhandle: Panhandle FZ to Dawn	Panhandle Field Zone	$ 2.84	$ 2.96	$ 2.98	$ 3.07	$ 3.31	**$ 3.03**	1.48%
NEXUS-Clar to Dawn	Dominion South Point	$ 2.06	$ 2.24	$ 2.55	$ 2.78	$ 2.97	**$ 2.52**	2.77%
Rover to Dawn	Dominion South Point	$ 2.06	$ 2.24	$ 2.55	$ 2.78	$ 2.97	**$ 2.52**	0.61%
TCPL: Niagara to Dawn	Niagara	$ 2.56	$ 2.71	$ 2.88	$ 3.05	$ 3.27	**$ 2.89**	0.46%

Sources for Assumptions:

Gas Supply Prices (Col D): ICF Q2 2024

Fuel Ratios (Col G): Average ratio over the previous 12 months or Pipeline Forecast

Transportation Tolls (Cols E & F): Tolls in effect on Alternative Routes at the time of Union's Analysis

Foreign Exchange (Col K) $1 US = $1.350 CDN From Bank of Canada Closing Rate October 1, 2024

Energy Conversions (Col K) 1 dth = 1 mmBtu = 1.055056

EGI's Analysis Completed: Oct-24

Paths included in analysis are those with comparable services available for contracting, as well as relevant benchmarks and currently contracted paths

Enbridge EDA Design Day Supply Option Analysis

Route	Point of Supply	Supply Cost $US/mmBtu	Unitized Demand Charge $US/mmBtu	Commodity Charge $US/mmBtu	Fuel Charge $US/mmBtu
TCPL: Long-haul	Empress	$ 10.23	0.81	0.00	0.4444
TCPL: Short-haul via Dawn to Parkway	Dawn	$ 8.13	0.38	0.00	0.1086
TCPL: Short-haul via Niagara	Niagara	$ 6.39	0.37	0.00	0.0620
TCPL: Short-haul via Iroquois	Iroquois	$ 17.63	0.12	0.00	0.0486
Third-Party	Iroquois	$ 17.63	1.32	0.63	

Foreign Exchange $1 US = 1.3504 CDN From Bank of Canada Closing Rate October 1, 2024

		2024/25	2025/26	2026/27	2027/28	2028/29	Average Cost $US M/yr	Average Cost $CAD M/yr
Number of days		365	365	365	365	366		
Design Day Shortfall (GJ/d)		14,311	16,770	18,779	20,342	21,428		
TCPL: Long-haul	Demand - yr	4.3	5.0	5.6	6.0	6.4	5.45	6.97
	Supply - 4 days	0.6	0.7	0.8	0.8	0.9		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		0.6	0.7	0.8	0.9	0.9	0.78	1.00
							6.23	7.97
TCPL: Short-haul via Dawn to Parkway	Demand - yr	2.0	2.3	2.6	2.8	3.0	2.56	3.28
	Supply - 4 days	0.5	0.5	0.6	0.7	0.7		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		0.5	0.6	0.6	0.7	0.7	0.60	0.77
							3.17	4.05
TCPL: Short-haul via Niagara	Demand - yr	1.9	2.2	2.5	2.7	2.9	2.45	3.14
	Supply - 4 days	0.4	0.4	0.5	0.5	0.5		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		0.4	0.4	0.5	0.5	0.6	0.47	0.61
							2.93	3.75
TCPL: Short-haul via Iroquois	Demand - yr	0.6	0.7	0.8	0.9	1.0	0.81	1.04
	Supply - 4 days	1.0	1.2	1.3	1.4	1.5		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		1.0	1.2	1.3	1.4	1.5	1.30	1.66
							2.11	2.70
Third-Party	Demand - 10 days	0.2	0.2	0.2	0.3	0.3	0.24	0.31
	Supply - 4 days	1.0	1.2	1.3	1.4	1.5		
	Variable - 4 days	0.0	0.0	0.0	0.1	0.1		
		1.0	1.2	1.4	1.5	1.6	1.34	1.71
							1.58	2.02

Union NDA Design Day Supply Option Analysis

Route	Point of Supply	Supply Cost $US/mmBtu	Unitized Demand Charge $US/mmBtu	Commodity Charge $US/mmBtu	Fuel Charge $US/mmBtu
TCPL: Long-haul	Empress	$ 10.23	0.52	0.00	0.3697
TCPL: Short-haul via Dawn to Parkway	Dawn	$ 8.13	0.40	0.00	0.1112
Hagar LNG	Dawn	$ 3.24	0.00	0.89	0.0000
Third-Party	Iroquois	$ 17.63	1.32	0.63	

Foreign Exchange $1 US = 1.3504 CDN From Bank of Canada Closing Rate October 1, 2024

		2024/25	2025/26	2026/27	2027/28	2028/29	Average Cost $US M/yr	Average Cost $CAD M/yr
Number of days		365	365	365	365	366		
Design Day Shortfall (GJ/d)		10,838	10,764	10,510	10,068	9,455		
TCPL: Long-haul	Demand - yr	2.1	2.1	2.0	1.9	1.8	1.97	2.53
	Supply - 4 days	0.4	0.4	0.4	0.4	0.4		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		0.5	0.5	0.4	0.4	0.4	0.44	0.56
							2.41	3.09
TCPL: Short-haul via Dawn to Parkway	Demand - yr	1.6	1.6	1.5	1.5	1.4	1.50	1.92
	Supply - 4 days	0.4	0.3	0.3	0.3	0.3		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		0.4	0.4	0.3	0.3	0.3	0.34	0.44
							1.84	2.36
Hagar LNG	Demand - yr	-	-	-	-	-	-	-
	Supply - 4 days	0.1	0.1	0.1	0.1	0.1		
	Variable - 4 days	0.04	0.04	0.04	0.04	0.03		
		0.2	0.2	0.2	0.2	0.2	0.17	0.22
							0.17	0.22
Third-Party	Demand - 10 days	0.14	0.14	0.14	0.13	0.12	0.14	0.17
	Supply - 4 days	0.76	0.76	0.74	0.71	0.67		
	Variable - 4 days	0.03	0.03	0.03	0.03	0.02		
		0.8	0.8	0.8	0.7	0.7	0.75	0.97
							0.89	1.14

Union WDA Design Day Supply Option Analysis

Route	Point of Supply	Supply Cost $US/mmBtu	Unitized Demand Charge $US/mmBtu	Commodity Charge $US/mmBtu	Fuel Charge $US/mmBtu
TCPL: Long-haul	Empress	$ 10.23	0.32	0.00	0.0830
TCPL: via Dawn to Parkway	Dawn	$ 8.13	0.78	0.00	0.0683
GL: Michcon to WDA	Michcon	$ 4.96	0.41	0.02	0.0873
Third-Party	Iroquois	$ 17.63	0.41	0.38	-

Foreign Exchange $1 US = 1.3504 CDN From Bank of Canada Closing Rate October 1, 2024

		2024/25	2025/26	2026/27	2027/28	2028/29	Average Cost $US M/yr	Average Cost $CAD M/yr
Number of days		365	365	365	365	366		
Design Day Shortfall (GJ/d)		-	-	-	-	-		
TCPL: Long-haul	Demand - yr	-	-	-	-	-	-	-
	Supply - 4 days	-	-	-	-	-		
	Variable - 4 days	-	-	-	-	-		
		-	-	-	-	-	-	-
							-	-
TCPL: via Dawn to Parkway	Demand - yr	-	-	-	-	-	-	-
	Supply - 4 days	-	-	-	-	-		
	Variable - 4 days	-	-	-	-	-		
		-	-	-	-	-	-	-
							-	-
GL: Michcon to WDA	Demand - yr	-	-	-	-	-	-	-
	Supply - 4 days	-	-	-	-	-		
	Variable - 4 days	-	-	-	-	-		
		-	-	-	-	-	-	-
							-	-
Third-Party	Demand - 10 days	-	-	-	-	-	-	-
	Supply - 4 days	-	-	-	-	-		
	Variable - 4 days	-	-	-	-	-		
		-	-	-	-	-	-	-
							-	-

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

1

Reference:

2025 GSP, p.5

Preamble:

EGI evidence states: ***Cost-effectiveness*** – *The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.*

We would like to understand how EGI achieves the principle of Cost-effectiveness.

Question(s):

How is cost-effectiveness measured for the gas supply plan and alternative selection when considering the total bill impact of services including load-balancing, on an annualized basis?

Response:

The gas supply plan evaluates cost-effectiveness on the basis of total annual portfolio costs, which is comprised of commodity, transportation and storage costs. When evaluating incremental contracting alternatives, Enbridge Gas evaluates the cost-effectiveness of contracting alternatives by comparing changes in total portfolio costs. An example of this approach is outlined at Appendix C, page 6.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ginoogaming First Nation (GFN)

Interrogatory

Issue:

1

Reference:

The 5-Year Gas Supply Plan ("GSP") generally, and especially pages 5, 17 and 63-72

Preamble:

Enbridge Gas Inc. ("EGI") serves over 3.9 million residential, commercial, and industrial customers across more than 300 municipalities and more than 20 First Nations throughout Ontario.

The GSP contains almost no references to First Nations or its Indigenous customers.

Question(s):

a) Please place Enbridge Inc.'s Indigenous Reconciliation Action Plan ("IRAP") and Indigenous Peoples Policy ("IPP") on the record.

b) Please confirm that the IRAP and IPP apply to EGI.

c) Did EGI engage and consult with any First Nations and/or First Nations customers in preparing the GSP?

   If yes, please describe the engagement activities and indicate how the views of First Nations and First Nations customers informed the GSP.

   If no, please explain why not and discuss whether EGI would support increased engagement with First Nations as part of the annual gas supply review process.

d) Did EGI present the GSP to the Indigenous Working Group? If it did, please provide particulars. If it did not, please explain why it did not.

e) Did EGI present elements of the GSP to the Indigenous Working Group? If it did, please provide particulars. If it did not, please explain why it did not.

f) Please describe how EGI has applied the principles, policies and commitments set out in the IRAP and IPP to the GSP.

g) Please provide specific comment on how each of the following items from the IRAP apply in the context of the current Application.

- Pillar 1 concerning people, employment and education
- Pillar 2 concerning community engagement and relationships
- Pillar 3 concerning economic inclusion and partnerships
- Pillar 4 concerning environmental stewardship and safety
- Pillar 5 concerning sustainability, reporting and energy transition

h) What are the impacts of the GSP on the cost of natural gas for First Nation reserve communities and off-reserve First Nation members? Why did EGI choose not to include this (or similar) information in the GSP?

Please include as part of your response the same information particular to Ginoogaming First Nation.

i) What are the impacts of the GSP on energy reliability and accessibility for First Nation reserve communities and off-reserve First Nation members? Why did EGI choose not to include this (or similar) information in the GSP?

Please include as part of your response the same information particular to Ginoogaming First Nation.

Response:

a) Please see Attachment 1 and 2 for the IRAP and IRAP refresh, respectively and Attachment 3 for the IPP.

b) The IRAP and IPP apply to all of Enbridge Inc.'s business units, including Enbridge Gas Inc.

c) While Enbridge Gas did not engage and consult with First Nations in preparing the gas supply plan, we note that the regulatory process itself provides an opportunity for interested Indigenous intervenors to participate in the process by participation in the Issues Conference, asking interrogatories, filing intervenor evidence, seeking

further clarity at the Technical Conference and submitting argument for consideration in the gas supply plan.

Enbridge Gas also notes that, in the Review of 2024 Annual Update[1] from the OEB, OEB Staff recommend that

> The GSP review process provides – and should continue to provide – an opportunity for interested First Nations customers to participate. As noted above, in addition to the GSP process, the IWG is designed to address in greater detail the concerns raised by Three Fires & Minogi such as Demand Side Management (DSM) programs for First Nation communities and energy transition topics, such as stranded assets.33 Having an adjudicative process to review Enbridge Gas's next five-year GSP – as recommended below- would allow the OEB to consider whether any specific First Nations concerns need to be addressed in subsequent Annual Updates.

d-e) Enbridge Gas did not present to the IWG on the gas supply plan. At the March 2025 IWG meeting, one of the IWG members requested that the gas supply plan be discussed with the IWG so they could proactively provide comments. At the May 2025 meeting, Enbridge Gas advised that the gas supply plan had been filed with the OEB and suggested the appropriate forum for interested Indigenous groups to participate in the gas supply related matters is with the public regulatory process so the OEB could consider any concerns or interests raised by Indigenous intervenors with respect to the gas supply plan.

Enbridge Gas would be pleased to provide the IWG with a presentation on the gas supply plan, why the gas supply plan is required to be completed by Enbridge Gas and the process the Company takes to develop the gas supply plan.

f-g) Enbridge Inc.'s Indigenous Peoples Policy (IPP) directs the methods by which Enbridge develops mutually beneficial relations with Indigenous communities close to, or potentially affected by, our operations. The adjudication of the gas supply plan by the OEB is not expected to have a physical impact on traditional lands or on Aboriginal and treaty rights and therefore, Enbridge Gas has not undertaken a consultation program commensurate with what would be undertaken in relation to an application for facilities that may have a potential impact on Aboriginal and treaty rights. That said, the overarching principles in the IPP, including the recognition of the importance of reconciliation between Indigenous peoples and broader society, continues to guide Enbridge Gas's interactions with Indigenous groups.

The IRAP is not a document that is intended to be directly applied to regulatory applications. The IRAP serves as a corporate roadmap for Enbridge Inc.'s continued journey towards truth and reconciliation. It is the mechanism by which Enbridge Inc.,

[1] EB-2024-0067, Report of the Ontario Energy Board, January 2025, p.41.

as a company, remains accountable for executing on its commitments and to its partners, including Indigenous groups. Enbridge Inc. started publicly reporting on its progress against the commitments set out in the IRAP starting with its 2023 Sustainability Report.

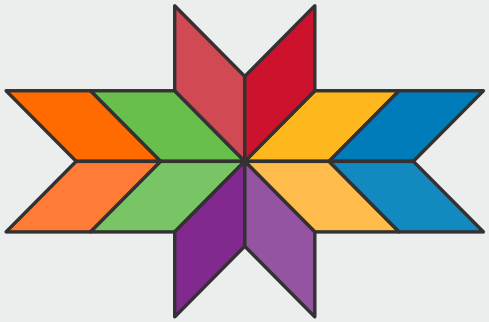
h-i) The gas supply plan does not report information to this level of granularity, therefore, Enbridge Gas cannot provide the cost of natural gas, nor the impacts on energy reliability and accessibility for Ginoogaming First Nation, First Nation reserve communities and off-reserve First Nation members.

The journey ahead

2022 Indigenous Reconciliation Action Plan

ENBRIDGE

Life Takes Energy



Over the years, Enbridge has been honored with blankets gifted from Indigenous groups. The blankets served as a source of inspiration for the design of the 2022 Indigenous Update Report and this star graphic. We honor these gifts and their importance to the fabric of our culture, and our dedication to continued learning and inclusion of Indigenous culture, heritage and teachings in our everyday lives.

Table of contents

Why an Indigenous Reconciliation Action Plan?

Enbridge is proud to share this Indigenous Reconciliation Action Plan (IRAP). As a North American company, it is important to foster meaningful reconciliation within communities where we live and work. This IRAP continues our long-held commitment to advancing reconciliation with Indigenous peoples. Further, it is developed in recognition of the Truth and Reconciliation Commission's Call to Action #92, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and with respect for and acknowledgement of Indigenous rights and title, treaties, and sovereignty across Turtle Island[1]. Our IRAP will serve as the roadmap by which we will continue our journey to advance truth and reconciliation. It is the mechanism by which we will remain accountable for executing on our commitments and to our partners, including Indigenous peoples.

* All dollar amounts are in CAD except when specified in USD.

[1] The continent of North America is often referred to as Turtle Island by some Indigenous peoples. Both terms appear within this IRAP, where appropriate.

ENBRIDGE
Life Takes Energy

Land acknowledgment

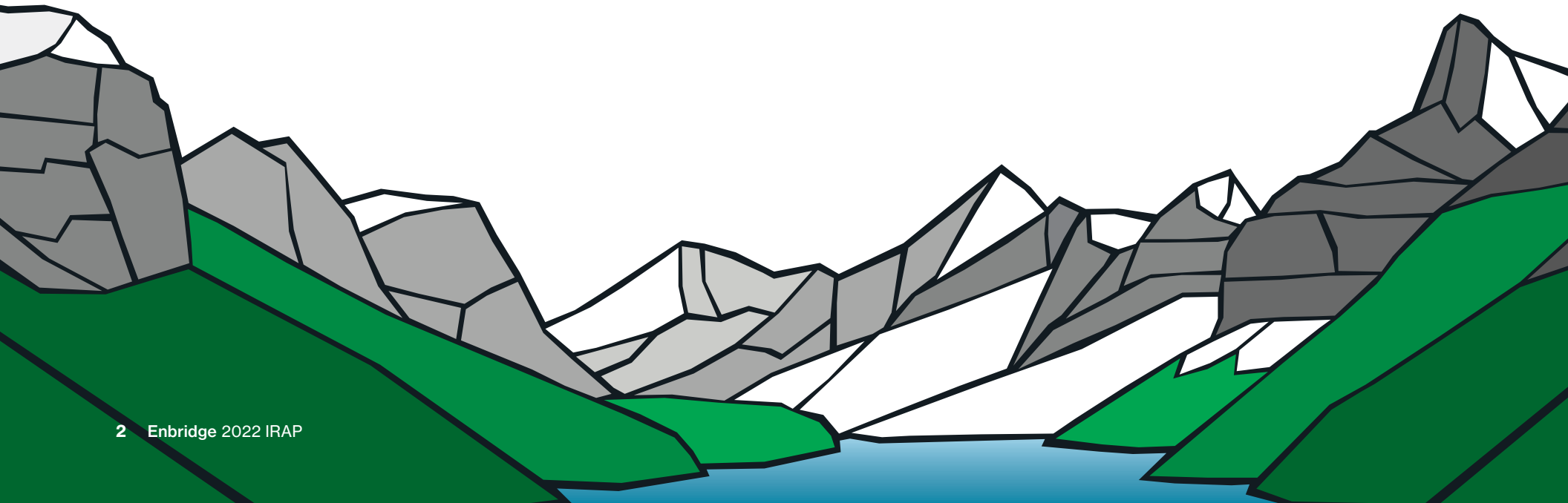
Our projects and operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous Nations, Tribes, Governments and Groups (Indigenous groups)[2] across North America.

[2] In this IRAP we are using the term "Indigenous groups" when referring to Indigenous nations, governments or groups in Canada and/or Native American Tribes and Tribal associations in the United States. We have the utmost respect for the unique rights and individual names of Indigenous groups across Turtle Island. This collective term is used solely for the purpose of the readability of the IRAP.

About the artist

Jason Carter is an Indigenous sculptor, painter, illustrator and public artist from the Little Red River Cree Nation at John D'Or Prairie, Alberta, and a Distinguished Alumni of MacEwan University. Jason has major permanent installations in both the Calgary and Edmonton International Airports, and his sculpture and canvas artwork are displayed in many public places (NAC, AFA, YWCA Calgary and Edmonton, Travel Alberta, Wood Buffalo Region, Stantec, Banff Caribou Properties, Microsoft and Canada Goose) and private collections globally.

In 2019, Jason was commissioned by the Museum of Aboriginal Peoples' Art and Artifacts of Canada to create three paintings (two 79" x 29" and one 58" x 29") to be permanently installed in the museum's entrance. Jason is the lead sculpture artist for 'In Search of Christmas Spirit'; an immersive sculpture exhibit in Banff, Alberta where he created 12′ to 18′ tall sculptures of bears, wolves, and bison lit from within like a lantern. He worked alongside Banff & Lake Louise Tourism and Parks Canada to complete this initiative. In 2021, Jason created wâpos; another large-scale sculpture installation celebrating the rabbit in Churchill Square, and Winter Solstice, which brought to light the importance of solstice and the passing of the sun and moon in Winter to Indigenous peoples. Most recently, Jason was commissioned by Hockey Canada to hand paint 150 hockey sticks gifted to the player of the game at the World Junior Championships in August 2022.



About Enbridge

Enbridge is a leading North American energy infrastructure company, headquartered on Treaty 7 territory and a portion of the Métis Homeland in Calgary, Canada. We operate locally, living and working in the communities near our projects and operations. Enbridge has additional major offices across Turtle Island in Houston, Edmonton, Toronto, Duluth and Chatham.

We safely and reliably connect millions of people to the energy they rely on every day, fueling quality of life through our North American natural gas, oil, or renewable power networks and our growing European offshore wind portfolio. We continue to invest in modern energy delivery infrastructure and are committed to reducing the carbon footprint of the energy we deliver. Our goal is to achieve net-zero greenhouse gas emissions by 2050.

To learn more, visit us at Enbridge.com.

> We believe that our business can play a critical role in advancing reconciliation, and that means acknowledging the truth and learning from the complicated and challenging history of Indigenous peoples. We need to understand the past in order to move forward.
>
> We are a values-driven organization, and therefore we recognize the deep and meaningful connections that Indigenous nations have to water, land and the environment. We've learned not to walk into Indigenous communities with all the answers, but rather to listen carefully to concerns and ask questions that further our understanding. We instill trust by listening carefully and working together – and delivering on the promises we make.
>
> To that end, our first Indigenous Reconciliation Action Plan (IRAP), and its commitments, serve as a beacon of our company-wide focus to advance reconciliation.
>
> That said, reconciliation at Enbridge is more than what could be embodied in this plan. It requires a thoughtful approach, hard work, and respecting and acknowledging our history. Most of all it requires our full commitment to building a better future together. In my experience, this hard work is not only necessary but is always worth the effort.
>
> **– Al Monaco**, President and CEO

Where we are now in our journey

As a company, we strive for a future where society is united in and committed to creating an inclusive future. We have a role to play in challenging long-held beliefs about the history of Indigenous peoples and embarking on and supporting a path towards reconciliation. As we learn more, and reflect on and acknowledge our journey to date, we create a path that we can walk, together, towards reconciliation. Enbridge is responsible for forging this path – by continuing to listen to and learn about the history, culture and perspectives of Indigenous peoples and identify ways to enable, encourage and support this journey.

While we have been building relationships with Indigenous groups for many years, Enbridge made a commitment in 2017 to enhance transparency by expanding reporting on the implementation of our Indigenous Peoples Policy and the steps we are taking to integrate Indigenous rights and knowledge into our business across Turtle Island. In June 2018, we began to fulfill that commitment with the release of a discussion paper, *Indigenous Rights and Relationships in North American Energy Infrastructure*, and have since provided an annual overview of our plans, commitments and outcomes with respect to Indigenous inclusion within our 2018–2021 sustainability reports.

We most recently reported on our corporate journey towards reconciliation in February 2022 with the release of, *Continuing Our Path to Reconciliation: Indigenous Engagement and Inclusion—An Update*. Our work to date has been values-driven, focused on collaboration and has taken shape in our lifecycle approach to engagement and supply chain opportunities, and employment, education, and Indigenous cultural awareness initiatives.

> While much work has been done, there is much more to do. We have a responsibility to continue moving forward.

This, our first Indigenous Reconciliation Action Plan (IRAP), is an opportunity to continue our unwavering commitment to reconciliation. These tangible, measurable and publicly reportable commitments help to further underpin our Indigenous Lifecycle Engagement Framework by forming the next stage of our journey towards reconciliation, and support the transition towards a cleaner energy future in partnership and collaboration with Indigenous peoples.

Our commitments will require continued collaboration, patience, and a resolute commitment to advancing reconciliation. These commitments permeate across each of our four core businesses within Enbridge, transcend geographic borders and require us to focus on our role as an energy company whose projects and operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous Nations, Tribes, Governments and Groups (Indigenous groups)[2] across Turtle Island. Enbridge has consulted and engaged with more than 340 Indigenous groups in Canada and the United States.

We also acknowledge and express our gratitude to the 50 individuals from Indigenous groups across Canada and the United States who provided valued input early on in our IRAP development process, and whose insights have helped shape our commitments and the priorities for this continued journey towards reconciliation. Thank you – for your honesty, your willingness to engage, and your thoughtful contributions – all of which help direct the trajectory of this journey to reconciliation and a sustainable energy future.

Through this IRAP, and the actions we will undertake to support and advance our 22 commitments, we must create opportunities – for dialogue, for listening, for knowledge transfer, and for collaboration and partnership with Indigenous groups. Put simply, reconciliation is supported by creating connections, and furthered by building bridges that connect recognition of the past to a shared vision for the future.

IRAP vision and values

At Enbridge, our core values – Safety, Integrity, Respect and Inclusion – reflect what is truly important to us as a company. These values represent the "north star" for our organization, a constant beacon by which we make our decisions, as a company and as individual employees, every day. In 2020, we invested time and energy listening to our employees speak about their experiences, including the barriers faced by Indigenous peoples. This engagement resulted in the addition of inclusion as a core value. We are committed to upholding these values as we collectively walk a path to reconciliation.

Our name, Enbridge, has long conveyed our commitment to being a bridge and leading the way to a safer, cleaner and more sustainable energy future. We recognize we have an important role to play in building bridges toward reconciliation and in collaborating with Indigenous peoples on the energy transition as we seek to be the leading energy infrastructure company in North America.

Our vision for this IRAP is that it will:

- Guide us on our continued journey to reconciliation
- Unite and focus us in our efforts to continue to build and nurture respectful and mutually beneficial relationships with Indigenous peoples
- Enable us to collaboratively create a safer, and more accountable, respectful, sustainable and inclusive future for seven generations[3] and beyond

We believe we can achieve more together – collaboratively, respectfully, purposefully and transparently.

[3] "Seven generations" is an Indigenous sustainability principle that says that we should consider how every decision will impact and affect those seven generations into the future.

About this IRAP

This IRAP is organized into six pillars and outlines a total of 22 commitments. Full details and targets are provided in the pages that follow.

These pillars represent our priorities, a cornerstone of our commitment to reconciliation, each collaboratively developed with the input of Indigenous individuals and groups. Our pillars will endure, and while the commitments may evolve over time, we expect each pillar will remain stable and consistent. Enbridge will develop tools and mechanisms to support and execute on these commitments on our path towards reconciliation.

We will publicly report on our progress against these commitments annually, starting with an update on our progress in our 2023 Sustainability Report.

SIX PILLARS

1 People, employment and education

2 Community engagement and relationships

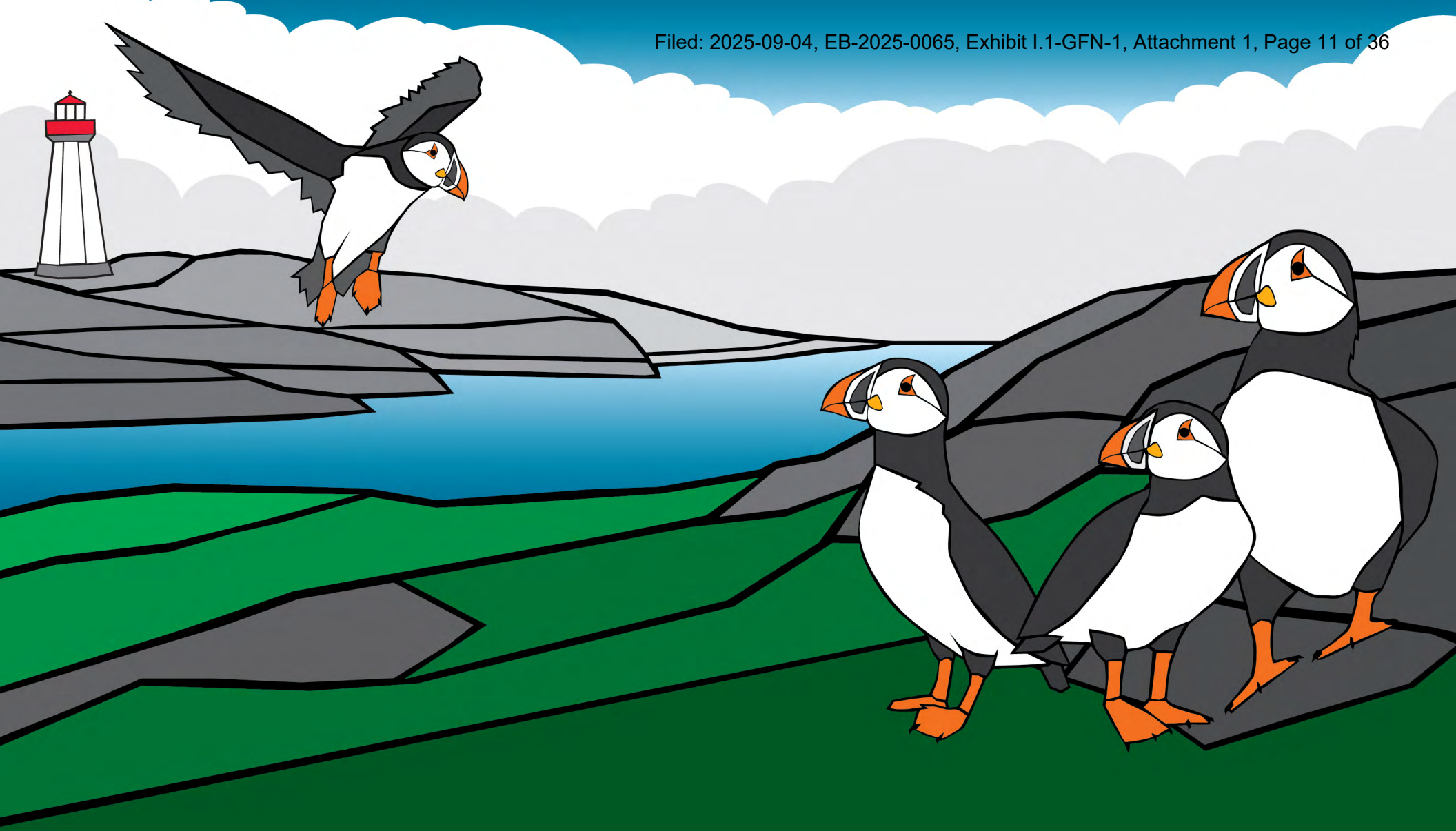
3 Economic inclusion and partnerships

4 Environmental stewardship and safety

5 Sustainability, reporting and energy transition

6 Governance and leadership

Reconciliation Action Pillars



PILLAR 1

People, employment and education

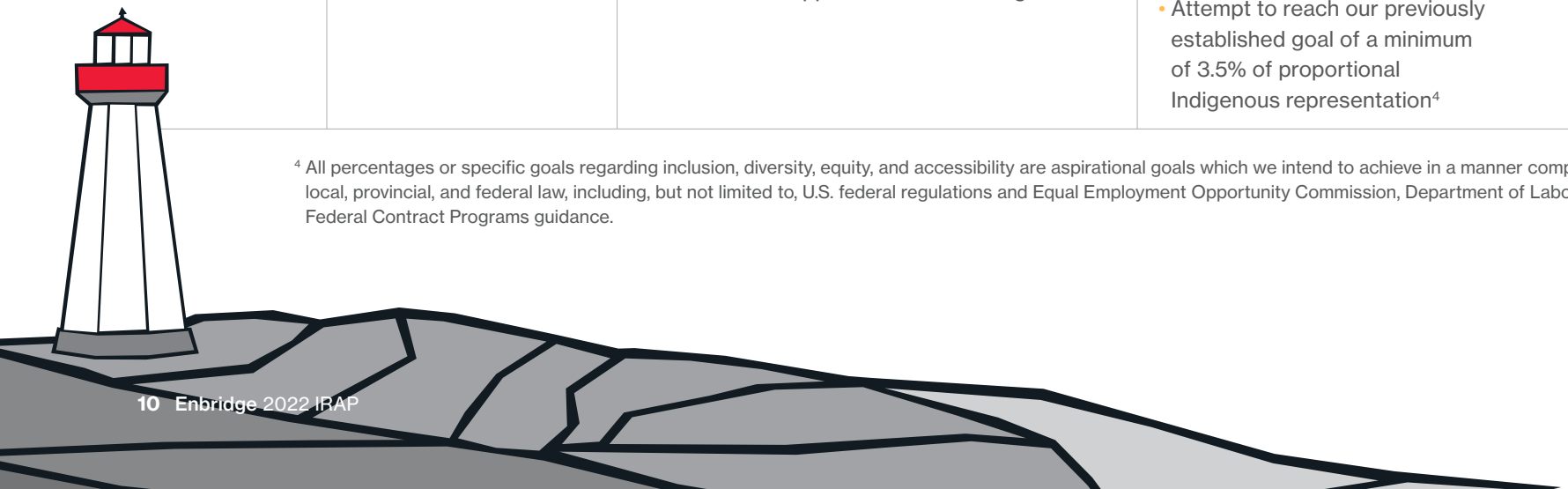
Enbridge is committed to creating and nurturing organizational structures that support opportunities to attract, retain and develop the skills of Indigenous people at all levels and in positions that make Enbridge the place to build their careers in a culturally supportive work environment.

PILLAR 1

People, employment and education

Focus	Commitment	Details	Target/Goal	Timeline
Talent attraction and recruiting	Establish flexible work placements and opportunities for Indigenous peoples that account for regional and cultural considerations across Canada and the United States	• In addition to current organizational workplace flexibility options, identify and develop opportunities for roles in other locations where there might be increased availability of Indigenous applicants • Identify and resolve employment barriers for current and future Indigenous employees • Explore updating leaves policies to reflect cultural inclusivity	• Update Indigenous engagement employment program to account for Indigenous culture, regional/remote considerations and legal considerations, as appropriate • Explore establishing a cultural leave program	2022 – Ongoing
	Continue to seek and strive to increase Indigenous representation in Enbridge's permanent workforce	• Continue to review and develop Indigenous employment data and report annually • Work with Indigenous groups and training partners to identify current opportunities and key growth areas for employment and skills development • Explore new partnerships to grow talent pool and implement Indigenous recruitment strategies with the goal of increasing awareness of opportunities at Enbridge	• Continue to report metrics and provide annual disclosure • Identify key growth areas for employment and skills development • Establish partnership with Indigenous employment agency • Attend at least eight (8) Indigenous-focused career fairs throughout Canada and the United States • Attempt to reach our previously established goal of a minimum of 3.5% of proportional Indigenous representation[4]	2025

[4] All percentages or specific goals regarding inclusion, diversity, equity, and accessibility are aspirational goals which we intend to achieve in a manner compliant with state, local, provincial, and federal law, including, but not limited to, U.S. federal regulations and Equal Employment Opportunity Commission, Department of Labor and Office of Federal Contract Programs guidance.



Focus	Commitment	Details	Target/Goal	Timeline
Talent attraction and recruiting	Continue to review internal hiring processes and develop human resource capability to ensure all perspectives are reflected through attraction/ retention lifecycle	• Review existing talent policies and procedures to identify gaps and implement changes to ensure cultural perspectives and priorities are reflected throughout process(es) • Continue to conduct regular training with Talent Acquisition team on ways to conduct culturally sensitive interviews (e.g., understanding Indigenous cultural differences, uncovering hiring biases, interviewee evaluation criteria) • Where allowed by law, formalize Indigenous attraction/retention programming for diversity, cultural, regional and remote considerations	• Review and, where appropriate, update internal hiring processes • Conduct ongoing and regular training with Talent Acquisition team related to hiring practices • Explore development of policies/ procedures to support Indigenous attraction/retention programs	2022 – Ongoing
Talent experience and development	Increase representation of Indigenous employees within Enbridge's Leadership Development Program to support the retention and advancement of Indigenous employees	• Continue to support Indigenous employees through consultation, mentorship, onboarding, coaching and connection • Develop and diversify pools of candidates for apprenticeship and internship programs • Continue to identify and develop succession plans free from unconscious bias across the company	• Explore expansion of programs and opportunities for the growth of Indigenous employees/employee base	2023 – Ongoing

* Please note that bargaining unit employees are subject to the terms and conditions of their collective bargaining agreement.

PILLAR 1

People, employment and education

Focus	Commitment	Details	Target/Goal	Timeline
Cultural support programs	Continue to develop and maintain cultural support programs to make Enbridge an attractive and welcoming employer for all people, including Indigenous peoples	• Continue to include and develop Indigenous Employee Resource Groups across the company • Expand programs related to Sharing Circles and Indigenous employee support across the company • Continue to create culturally inclusive and safe spaces across the company that are supportive and celebrate Indigenous arts and culture. • Develop a regional-based implementation model inclusive of diverse perspectives across the company • Establish an Elder connections program to give employees direct access to Indigenous Elders for advice and cultural support	• Continue to implement and expand cultural support programs • Integrate Indigenous arts and culture in Enbridge offices and facilities across Turtle Island	2023 – Ongoing
Learning and awareness	Ensure 100% of Enbridge's employees complete Indigenous awareness training	• Ensure opportunities exist for employees to develop a deeper understanding of the history, rights, culture and knowledge of Indigenous peoples by completing online or in-person cultural awareness training • Explore tailored training for groups across Enbridge, as needed • Track and monitor completion statistics of required Indigenous Awareness Training	• 100% employee participation in cultural awareness training • Ensure every new Enbridge employee receives cultural awareness training as a requirement	2022

PILLAR 1

Spotlight: Gas Distribution and Storage Mentorship Program

As an example of forging new pathways and living our values—the Gas Distribution and Storage (GDS) Mentorship Program aims at reducing barriers and increasing opportunities for Indigenous recruitment and employment.

> Wendy Landry (left) and previous mentorship participant, now full-time Enbridge employee, Lauryn Graham (right) pose next to the Enbridge sign in Eastern Region.

Enbridge's Gas Distribution and Storage (GDS) Northern Mentorship Program, now in its fourth year, was founded when our Northern Region team in GDS recognized their approach to recruit local Indigenous talent for various positions over several years was largely unsuccessful. "We have a duty to reflect the communities we serve, yet we struggled to attract local Indigenous talent after years of effort and commitment," said Luke Skaarup, former Director Northern Region Operations GDS and now Director Operations Services for Enbridge's Liquids Pipelines Operations. "We needed to work collaboratively both internally and externally to course correct."

The team sought approval for and actioned the re-purposing of Enbridge's co-operative and summer student roles for Indigenous mentorship and engaged with local Indigenous groups and unions to reduce the very real barriers to entry into Enbridge – and more generally, corporate Canada – by enhancing the accessibility of our job postings, inviting initial discussions and conducting interviews within communities. They provided recognition for relevant lived experience in addition to professional experience.

> "The success in identifying and connecting candidates with positions came from the commitment and foresight of early champions of this program and a willingness to depart from the normalized hiring processes that create barriers to entry for some Indigenous candidates."
>
> – **Wendy Landry,** Enbridge Senior Indigenous Initiatives and Engagement Advisor

PILLAR 1

Gas Distribution and Storage Mentorship Program continued

"The success in identifying and connecting candidates with positions came from the commitment and foresight of early champions of this program, and a willingness to depart from the normalized hiring processes that create barriers to entry for some Indigenous candidates," said Wendy Landry, Red Rock Indian Band member, Mayor of Shuniah and Senior Indigenous Initiatives and Engagement Advisor to Enbridge. While there is more work to do, this program has helped develop capacity by identifying where there were gaps in the recruitment and hiring process and how best to address those gaps to create pathways to employment – with Enbridge or elsewhere in the energy industry.

> The team focused internally on identifying pathways to fulltime employment, on implementing a mentorship program, and approached recruitment and hiring in a more culturally sensitive and respectful manner.

In 2021, the Northern Region team in GDS hired four mentees with an additional Indigenous employee successfully competing for a fulltime construction laborer position. We also partnered with the Métis Nation of Ontario as part of a Métis Youth Internship Program to on-board one additional hire to our construction team, and Distribution Operations initiated an Indigenous Community Outreach program as part of its diversity and inclusion strategy.

Enbridge is focused on expanding the mentorship program across GDS in Ontario in 2022, along with the implementation of an internal awareness campaign to increase understanding and support for Indigenous partnerships and collaboration.

Opportunities for dialogue and engagement with current and potential employees, including through the Indigenous Employment Resource Group and the Indigenous Sharing Circle, mean our journey of learning and adapting continues to inform the evolution of our Indigenous recruitment commitment. The entire team continues to identify mechanisms to enhance our accessibility, recruitment, retention and education practices.

PILLAR 2

Community engagement and relationships

Enbridge understands meaningful engagement and respectful relationships are foundational to advancing reconciliation. We are committed to developing strategies, mechanisms and opportunities that support and nurture dialogue and engagement between Enbridge and Indigenous groups throughout the lifecycle of our projects and operations.

PILLAR 2

Community engagement and relationships

Focus	Commitment	Details	Target/Goal	Timeline
Feedback mechanism	Develop an incremental formal mechanism for Indigenous groups to provide feedback to Enbridge	• In addition to ongoing engagement activities, and in consultation with Indigenous peoples, develop an incremental transparent feedback mechanism to facilitate input from potentially impacted Indigenous groups such as questions, concerns, and opportunities for collaborations related to Enbridge's projects and operations	• Establish and launch feedback mechanism	2023 – Ongoing
Community engagement and relationships	Provide $80 million in cumulative funding support for engagement priorities, community capacity building and fostering wellbeing over the next five years	• In addition to Enbridge's Indigenous contracting and procurement spend, these funds are intended to support community capacity and wellbeing. This may include dollars from relationship agreements, taxes paid and/or corporate/regional community investment	• $80 million in cumulative funding over five years	2022 – 2027

PILLAR 2

Spotlight: Patrick Hunter mural

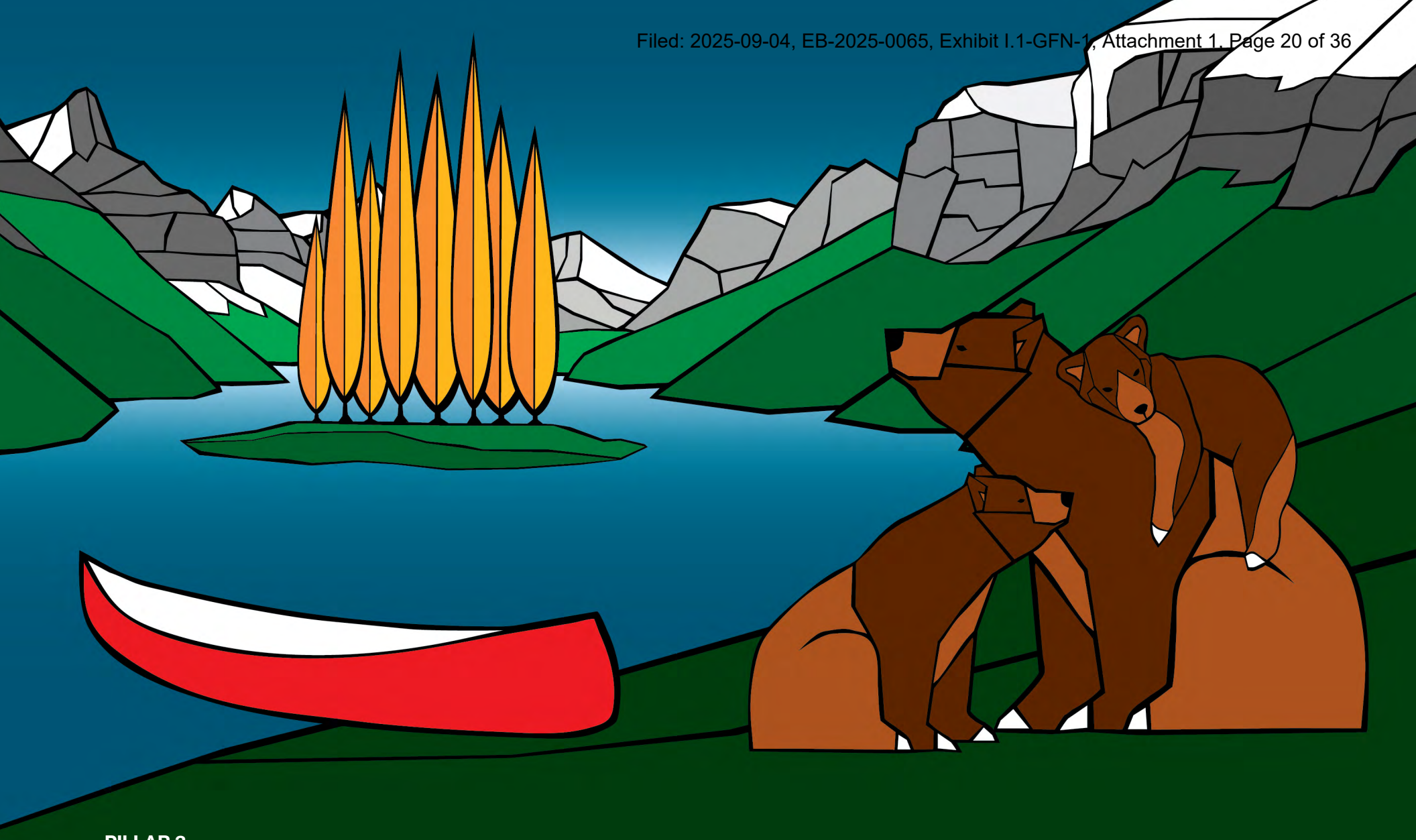
How an art installation ignites and inspires conversation and connection to each other, the land and Indigenous culture and history.

> I think it's important for companies today to realize the land they are on was once another culture's territory. Public acknowledgments of that fact are such a great first step towards being on the right side of history.
>
> – **Patrick Hunter,** Ojibway artist

Patrick Hunter is a two Spirit Ojibway artist, graphic designer and entrepreneur from Red Lake, Ontario. Patrick is one of Canada's well-known Woodland artists, gaining inspiration from his homeland, painting what he sees through a spiritual lens, with the intent to create a broader awareness of Indigenous culture and iconography. Among his many projects are artwork he created for the Canadian Olympic Curling Team, the Chicago Blackhawks and Hockey Night in Canada.

In 2021, Enbridge commissioned Patrick to create two original pieces of art that could be digitized and used as murals in GDS facilities across Ontario. The pieces are installed in two locations: the third floor of the 50 Keil Drive office in Chatham, and the first floor of the Victoria Park Centre in Toronto. Both pieces represent the start of a longer-term project to prominently display a collection of original Indigenous artwork.

The murals, designed specifically for Enbridge, embody Patrick's personal reflections on and spiritual connection to the land and Indigenous territories in and around Ontario on which our GDS offices reside. They create awareness of Indigenous culture and history of the lands on which we work and live and connect us back to the natural world, something increasingly difficult to do in our urban environment. Not least, and perhaps most profoundly, they invite and ignite conversation, furthering our connections to each other and creating opportunities for dialogue, learning and reflection on our individual and collective journeys towards reconciliation.



PILLAR 3

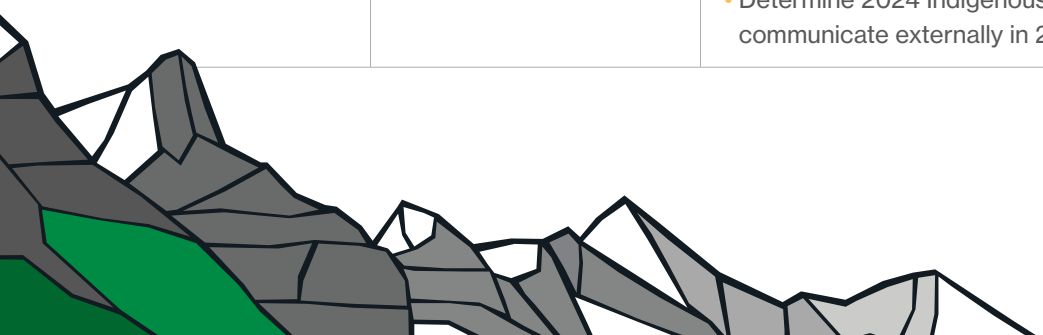
Economic inclusion and partnerships

Enbridge strives to create, engage in, and stimulate positive and mutually beneficial financial impacts, opportunities and potential partnerships with Indigenous groups and businesses.

PILLAR 3

Economic inclusion and partnerships

Focus	Commitment	Details	Target/Goal	Timeline
Indigenous financial partnerships	Revise and formalize Indigenous financial partnership processes that encourage strategies to provide opportunities for Indigenous economic participation	Establish a formal Indigenous Economic Development Taskforce to formalize processes that will: • Leverage business units' and project teams' insights to establish standards and criteria for financial partnerships within the company's investment review processes • Identify and review previous successes to develop financial opportunities that account for various regulatory, legal and socio-economic considerations • Undertake a review of the Indigenous financial capacity landscape and access to capital to ensure Enbridge facilitates opportunities that can be implemented • Engage with Indigenous groups to seek feedback and assess alignment between Enbridge's processes, market opportunities and new opportunities for Indigenous economic participation	• Develop Indigenous Economic Development Taskforce • Formalize processes and strategies for Indigenous economic participation • Implement new partnership processes and strategies that foster early engagement with Indigenous groups • Ensure Indigenous perspectives are included within review and development process(es)	2022 – Ongoing
Supplier capacity development	Advance opportunities for Indigenous businesses to participate in Enbridge's supply chain	• Develop and conduct information sessions over two years to provide guidance and education to Indigenous businesses seeking participation in Enbridge's supply chain • Continue to provide support for Indigenous businesses navigating Enbridge's procurement system	• Develop and conduct at least eight information sessions over two years	Ongoing
Indigenous procurement	Establish Indigenous spend targets	• Continue to establish benchmarks for Indigenous spend targets • Determine 2024 Indigenous spend targets and communicate externally in 2023	• Determine and disclose Indigenous spend targets	2023



PILLAR 3

Spotlight: Indigenous economic inclusion in gas transmission expansion projects in British Columbia

An expansion of B.C.'s gas transmission system created mutual opportunities and benefits for Indigenous businesses and Enbridge and shone a spotlight on the far-reaching impact and importance of Indigenous economic inclusion.

Enbridge is the owner and operator of British Columbia's (B.C.) major gas transmission system, connecting the province's natural gas exploration and production industry with millions of consumers and heating homes, businesses, hospitals and schools in B.C., Alberta, and the U.S. Pacific Northwest. Gas also fuels electric power generation and is a staple in many industrial and manufacturing processes.

In the fourth quarter of 2021, we completed two capital expansion projects – the T-South Reliability Expansion Project (TSRE) and the Spruce Ridge Expansion Program (Spruce Ridge). Enbridge conducted upgrades and reliability enhancements and expanded the capacity of the gas transmission system in B.C.

TSRE work included the installation of five new compressor units and associated equipment at five existing compressor stations, two

> These projects were completed with significant Indigenous engagement, participation and collaboration. In fact, the spend with Indigenous contractors in B.C. nearly doubled between 2018 and 2021.

compressor station cooler additions and three pipeline crossover projects. Twenty-four Indigenous groups participated and benefited economically, with Indigenous businesses securing and executing an aggregate of $54.7 million in contracts and subcontracts.

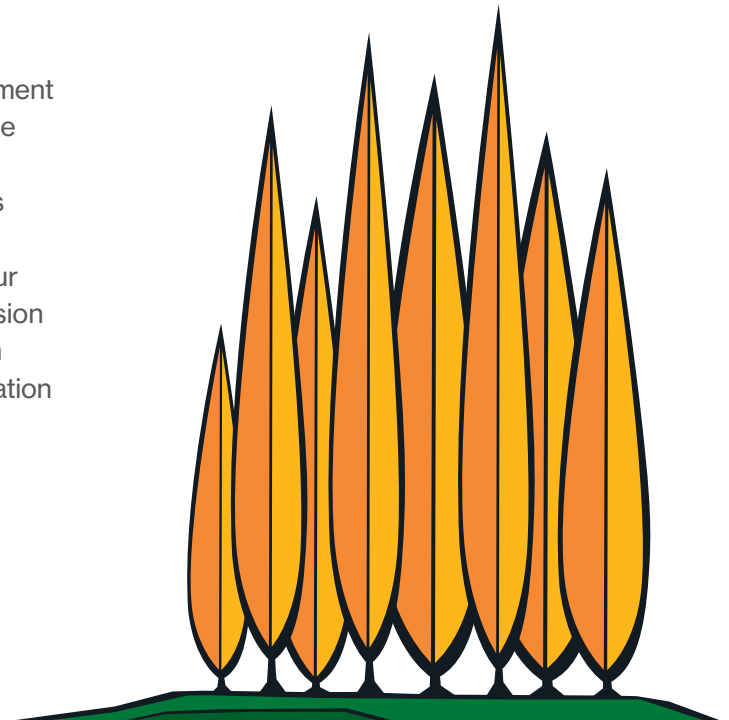
Spruce Ridge work involved the building of two new natural gas pipeline loops (the 13-km Aitken Creek Loop and the 25-km Chetwynd Loop), the addition of a new compressor unit at two compressor stations and some additional minor modifications at above-ground facilities. Nine Indigenous groups benefitted economically through subcontracting opportunities for an aggregate $66.6 million worth of contracts and subcontracts, including the award for construction of the Aitken Creek Loop to an Indigenous partner business.

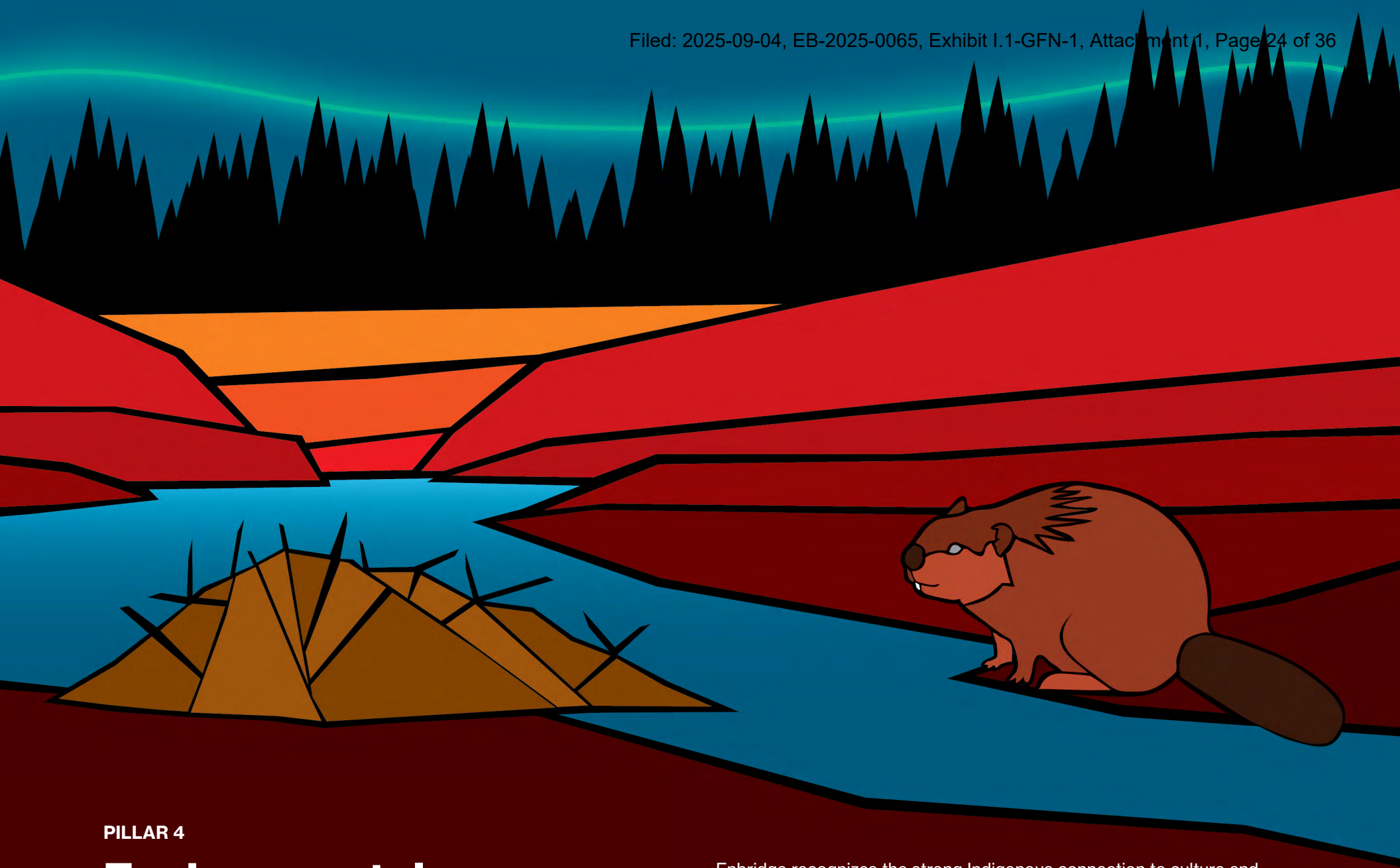
As we have walked this path towards reconciliation through the years, there have been pivotal moments along the way that have increased the momentum of our journey and created fundamental shifts in the way we do business. The focus on and implementation of measures to increase Indigenous economic inclusion and engagement is one such example of Enbridge's commitment on this journey.

The roll-out of Enbridge's Socio-Economic Requirements of Contractors (SERC) process in 2017 coincided with early engagement activities with Indigenous groups on TSRE and Spruce Ridge. The SERC guides our contractors on how we expect them to include Indigenous businesses in the execution of their work, as well as efforts to increase the use of Indigenous businesses as general contractors working directly for Enbridge. Each component of our focus on increased Indigenous economic engagement and inclusion was complemented by other mechanisms driving an increase in Indigenous economic inclusion and included targeted pre-qualification of Indigenous businesses; strategic direct award opportunities for Indigenous businesses to increase capacity and experience; and a focus on increasing capacity with Indigenous archaeology companies.

"Embracing relationships with Indigenous groups – giving them the opportunity to have a seat at the table, provide input on projects and to capitalize on opportunities is a big part of what reconciliation is [and to a further extent the implementation of UNDRIP in our daily lives]," said Chief Willie Sellars of Williams Lake First Nation.

"In addition, it's important to keep in mind the cultural, ceremonial, and traditional components of our way of life and incorporating that understanding and respect into projects. The TSRE ground-breaking at Compressor Station 6A 150 Mile House included a ground blessing, prayers and songs and provided an opportunity to introduce those present to our way of life and our traditions. This is so important as reconciliation requires education for people to be able to understand, to heal and to move forward. We are pleased to be able to work with Enbridge on this important journey towards reconciliation."





PILLAR 4

Environmental stewardship and safety

Enbridge recognizes the strong Indigenous connection to culture and the traditional importance of the land, air, animals and water. We are committed to environmental protection, collaborative stewardship, and continued improvement of engagement on, and inclusion of traditional and cultural knowledge in our plans, projects and operations.

PILLAR 4

Environmental stewardship and safety

Focus	Commitment	Details	Target/Goal	Timeline
Indigenous inclusion and traditional knowledge	Review and revise Enbridge's approach to Indigenous inclusion in the environmental review processes	• Assess current approach and identify opportunities for increased Indigenous inclusion and strengthening Enbridge's current mitigation strategies	• Confirm and utilize a phased approach to revise Enbridge's environmental review processes, as needed	2022 – Ongoing
	Regionally advance opportunities for Indigenous inclusion in environmental field work	• Regionally identify and advance opportunities for Indigenous participation in environmental field work	• Increase Indigenous involvement in fieldwork	2022 – Ongoing
Emergency preparedness and pipeline safety	Continue to share emergency management materials and encourage increased Indigenous awareness in emergency response	• Continue to share emergency management materials with Indigenous groups • Continue to generate awareness and provide opportunities for participation in emergency response exercises	• Continue to share relevant emergency management materials to generate awareness	2022 – Ongoing
	Continue to communicate with Indigenous groups regarding emergency and safety mechanisms and approaches	• Continue to provide notifications to Indigenous groups to ensure they are aware and engaged in the event of releases from pipeline systems • Develop a consistent process or protocol to share environmental and safety notices to Indigenous groups	• Proactively communicate with Indigenous groups through release notifications	2022 – Ongoing

PILLAR 4

Spotlight: Pontiac Township High School pollinator plot and Kickapoo Nation

An opportunity to advance sustainability commitments and facilitate connections that may endure for seven generations and beyond.

The Operation Endangered Species (OES) program was started in 2011 near Pontiac, Illinois, a brainchild of a group of Pontiac Township High School (PTHS) students with a biodiversity conservation initiative idea. The students approached their high school environmental science teacher with an idea to reintroduce endangered species on community pollination plots that would benefit surrounding agricultural land. The OES program at PTHS has raised US$150,000 over nine years to support the reintroduction of a species of reptile back to its native historic home range in Illinois.

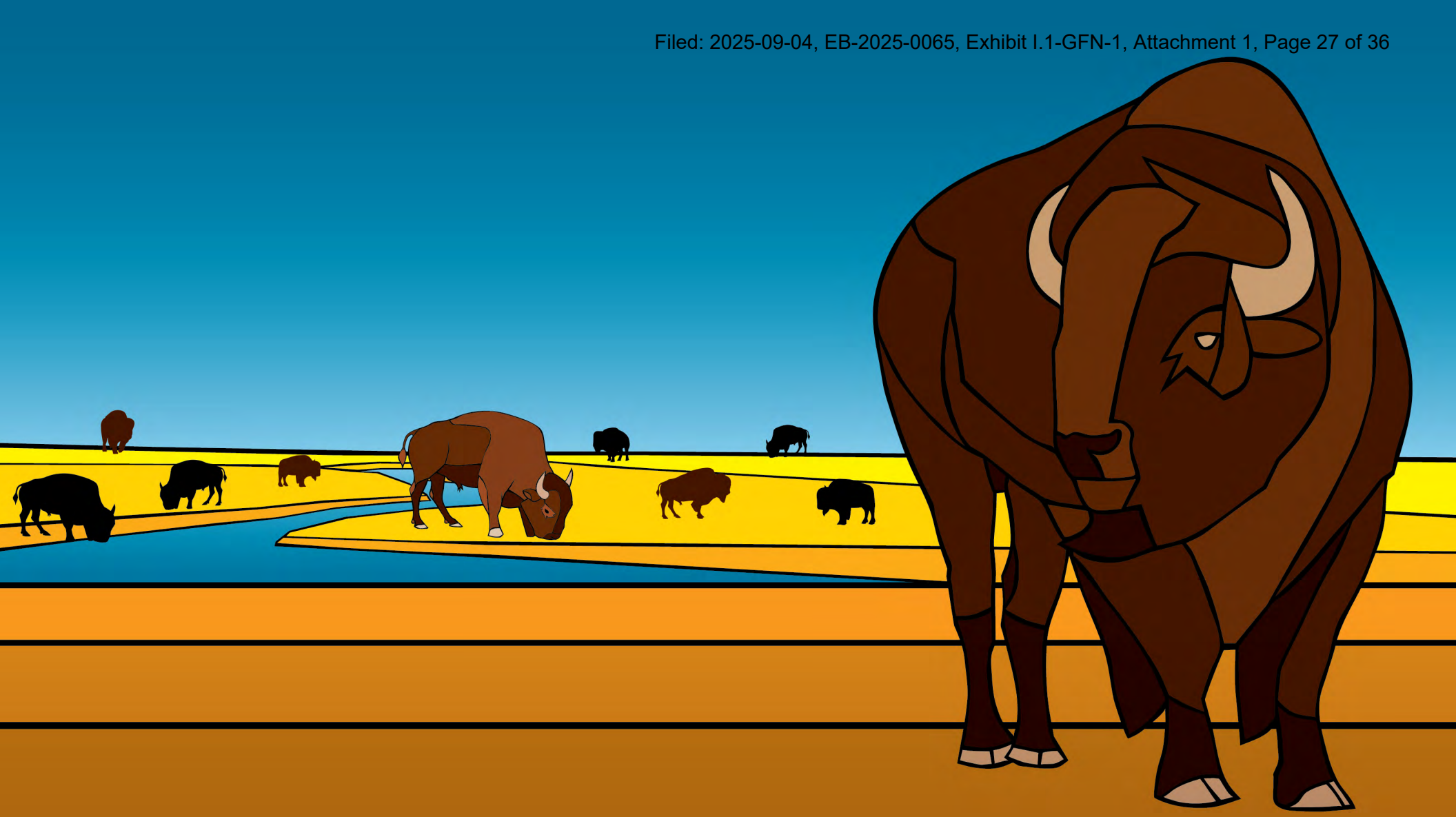
Following a US$10,000 grant from Enbridge to establish a pavilion on a nearby company-owned 20-acre pollinator plot, students from the PTHS Environmental Earth class set out to develop the land into a pollinator plot, planting native prairie grasses and other vegetation to encourage development of the natural ecosystem. In 2021, Enbridge donated the pollinator plot to PTHS and the OES program to facilitate the continuation of this meaningful and impactful conservation and community work and as part of our commitment to sustainability.

Upon completion of the land transfer, the U.S. History students of Pontiac began researching the origins of the land. They wanted to integrate respect for Indigenous groups into their ultimate use of the plot. Through this research, the students learned the land being developed as a pollinator plot in Illinois is within the ancestral lands of the Kickapoo tribe, which was one of 25 tribes forcibly relocated to Kansas between 1825 and 1850.

Through Enbridge's relationships with all parties, we were able to facilitate an introduction between PTHS, the Kickapoo tribe and the Odawa tribe, which has blossomed into a mutually respectful and engaged relationship where teachings about care and respect for the earth and ecology now occur on a weekly basis. Furthermore, Kickapoo spiritual leaders and PTHS students continue to find ways to weave cultural teachings and education opportunities together and a deep and mutual respect has been formed.

In upholding our vision for our IRAP and our role in reconciliation, we are proud to be able to facilitate connections that promote and support further learning and pathways to reconciliation that may have positive and permeating impacts for generations to come.

> "I've always believed that giving students opportunities and enabling them is the most impactful way to support them on their learning journey. The cultural learning and growth that occurred here was driven by the students, but Enbridge was a major part in helping facilitate that for them."
>
> – **Paul,** teacher at Pontiac Township High School



PILLAR 5

Sustainability, reporting and energy transition

Enbridge is committed to forming strategies and collaborative partnerships with Indigenous groups focused on advancing the energy transition to a low-carbon economy and transparently reporting on our progress against our commitments.

PILLAR 5

Sustainability, reporting and energy transition

Focus	Commitment	Details	Target/Goal	Timeline
Reporting	Report and disclose progress on IRAP commitments in ESG and Sustainability Report	• Increase transparency by addressing progress of IRAP commitments in annual Sustainability Report	• Disclose progress via annual Sustainability Report	2023 – Ongoing
	Refresh IRAP commitments and goals every two years	• Refresh IRAP commitments and goals every two years in conjunction with input from Indigenous groups, IRAP working group, employees and Executive Leadership Team	• Publish updated IRAP commitments/ goals every two years	2024 – Ongoing
Sustainability	Facilitate a thought leader roundtable related to Indigenous inclusion and perspectives in sustainability strategy and policies	• Identify key organizations/industry partners for inclusion in thought leader roundtable discussion • Work with roundtable participants to identify relevant topics related to sustainability, climate change, Indigenous perspectives and reconciliation that further support action, identify pathways towards implementation and build capacity within Indigenous groups to support implementation • Conduct roundtable(s) with participation from Indigenous groups and industry peers	• Establish partnership(s) with Indigenous-led organizations and relevant industry peers • Convene at least one thought leader roundtable • Consider the findings and Indigenous perspectives shared at the round table(s) when Enbridge sustainability strategies and policies are updated	2023

PILLAR 5

Spotlight: The Wabamun Carbon Hub—advancing carbon capture and storage and Indigenous partnership

A "Hub" of innovation and collaboration—the Open Access Wabamun Carbon Hub creates opportunities to advance partnerships and ownership in new energy projects with Indigenous groups.

> From left to right, Chief George Arcand Jr. (Alexander First Nation), Chief Arthur Rain (Paul First Nation), Chief Tony Alexis (Alexis Nakoda Sioux Nation), and former Chief Billy Morin (Enoch Cree Nation) of the First Nations Capital Investment Partnership, partners with Enbridge to pursue ownership in future carbon transportation and storage projects.

In the fight against climate change, the International Energy Agency calls Carbon Capture and Storage (CCS) one of the world's most critical carbon reduction technologies.

As countries like Canada aim to achieve net-zero emissions by 2050, the capture and permanent deep underground storage of carbon dioxide (CO_2) is being touted as a vital component of global efforts to contain those emissions from heavy industrial processes, including power generation, cement production and conventional energy production and refining.

One CCS project under development is our Open Access Wabamun Carbon Hub (the Hub) to be located west of Edmonton, Alberta, Canada.

The Hub would support recently announced carbon capture projects by Capital Power Corporation and Lehigh Cement, which represents an opportunity to avoid nearly four million tonnes of atmospheric CO_2 emissions – the equivalent of taking more than 1.2 million cars off the road annually.

The Hub will remain open access for other nearby capture projects and once built, will be one of the world's largest integrated carbon transportation and storage projects, effectively doubling the amount of CO_2 captured and stored today in Canada.

Engagement and dialogue about the Hub started early with Indigenous groups – even before the project was a project. The initial conversations took a "blank sheet of paper" approach and focused on

PILLAR 5

The Wabamun Carbon Hub—advancing carbon capture and storage and Indigenous partnership continued

opportunity and what could be. Through listening, learning, and acting in parallel, a partnership on the journey along this energy transition and in advancing carbon reduction, was formed.

In February 2022, Enbridge and the First Nation Capital Investment Partnership (FNCIP) announced a partnership agreement to advance the Hub. The FNCIP was formed by four Treaty 6 Nations – Alexander First Nation, Alexis Nakota Sioux Nation, Enoch Cree Nation, and Paul First Nation – to pursue ownership in major infrastructure projects with commercial partners who share Indigenous values. The Hub is the FNCIP's first partnership. The Lac Ste. Anne Métis community will also have an opportunity to pursue ownership in future carbon transportation and storage projects with the Hub.

> Critically, the Hub's Indigenous partners will have an opportunity to own up to 50% of the carbon transportation and storage projects developed in connection with the Hub. This openness to co-own and co-develop the assets is ground-breaking. These projects will create long-term, stable revenues for local Indigenous groups.

> "This path creates an opportunity to generate wealth, but more importantly it allows sustainable economic sovereignty for our communities. We are creating a healthy future for the next seven generations to thrive.
>
> We're looking forward to working with industry leaders who share our values of environmental stewardship and to collaborate with Enbridge on world-scale carbon transportation and storage infrastructure investments."
>
> **– Chief George Arcand Jr.,** Alexander First Nation

PILLAR 6

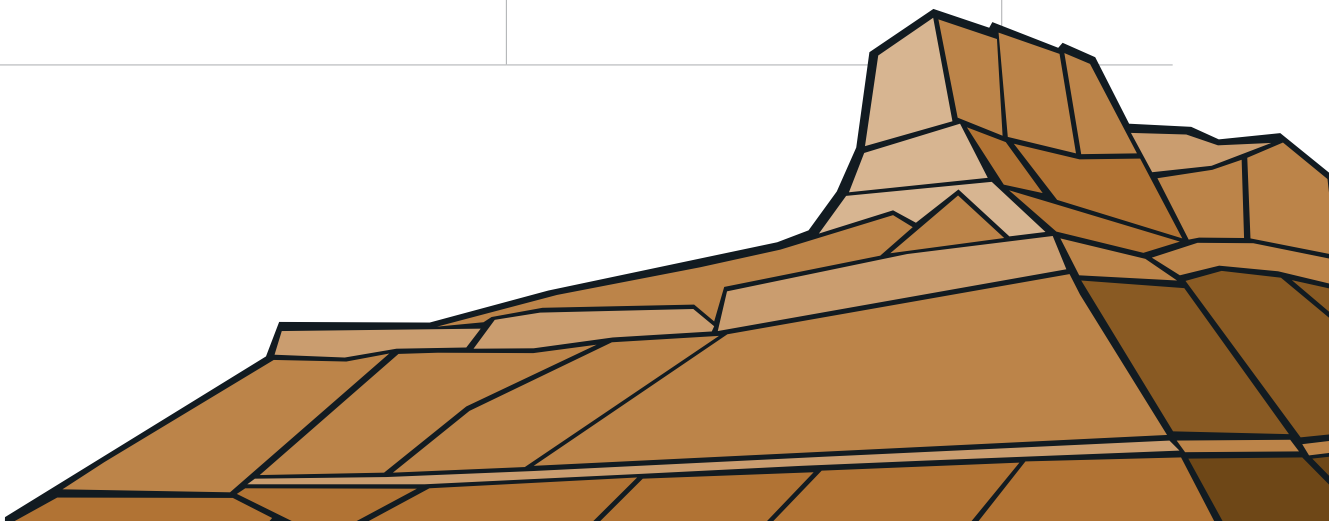
Governance and leadership

Enbridge is committed to the creation and support of governance and leadership structures that focus on embedding and promoting accountability for Indigenous engagement and inclusion across the organization. We will lead by example and hold each other accountable for the commitments we make on our reconciliation pathway forward.

PILLAR 6

Governance and leadership

Focus	Commitment	Details	Target/Goal	Timeline
Governance	Establish an Indigenous Advisory Group (IAG)	• Establish an IAG to provide advice and Indigenous and/or Tribal insight to executive management at Enbridge • Recruitment of IAG will include broad geographic representation and recruitment from diverse Indigenous groups	• Establish IAG and Terms of Reference	2023
Leadership and oversight	Ensure executive sponsorship and commitment to achieving IRAP goals	• Review executive support, sponsorship and accountability for IRAP specific commitments • Additional IRAP commitments to be linked to executive sponsorship	• Ensure IRAP performance is included in executive objectives	2023
	Ensure IRAP implementation and support mechanisms are established and aligned across the company	• Establish and maintain governance oversight for IRAP implementation and accountability	• Establish mechanisms for implementation and accountability of the IRAP	2023
Cultural awareness	Continue to conduct Indigenous Sharing Circles with participation from Executive Leadership Team	• Maintain and expand participation in Sharing Circles	• Conduct quarterly Indigenous Sharing Circles	2023 – Ongoing



PILLAR 6

Spotlight: Calgary smudge

A first-of-its-kind gathering within Enbridge provided an opportunity for personal reflection and Indigenous cultural awareness.

> A member of the Tsuu T'ina Nation west of Calgary conducts a smudge ceremony with members of our Calgary Indigenous Employee Resource Group.

In March 2022, employees were invited to gather with their colleagues, local Indigenous Elders and invited guests at our Calgary office in to participate in the first-ever indoor smudge held within our Enbridge infrastructure. The smudge experience, despite the large team gathered and being a first for most attendees, was deeply personal, reflective and spiritual.

The session was opened with a blessing and teachings by a local community Elder and led by Enbridge's Calgary chair of the Indigenous Employee Resource Group (IERG), an 18-year veteran of Enbridge and a Saulteaux member of the Cote First Nation. The smudge and teachings were a powerfully moving experience. "This event embodied the true spirit of reconciliation," said Edie Severight. "Providing an opportunity for respectful education, and exposure to important Indigenous cultural traditions in a safe and inclusive way creates crucial space for learning and connection."

This event was supported by the senior executive team and attended by management, there were extensive approvals required to facilitate permits and manage the logistics of the smudge. The ceremony created an opportunity for awareness, learning and dialogue around the rich cultural practices of Indigenous peoples.

> "Smudging is an opportunity to reflect, cleanse the air and connect to the Creator. I look forward to sharing this ritual with my colleagues through many season changes to come."
>
> – **Edie Severight,** Law Analyst and Chair of Indigenous Employee Resource Group (IERG), Calgary chapter

The journey ahead

Our commitment to this journey is steadfast. Our goal is to create and nurture sustainable, respectful and mutually beneficial relationships with Indigenous groups in the areas in which we operate.

Our approach to Indigenous engagement and inclusion is continuously evolving. Our journey of reconciliation is a journey of continual listening, learning, reflection and action.

This IRAP is an evolutionary milestone – we are committed to this work, to continue to challenge ourselves, our leaders, and our suppliers to walk a shared path to reconciliation and to taking an innovative and progressive approach to collaboration and inclusion.

2022 Indigenous
Reconciliation Action Plan

About the animals

Puffin: is an incredible social creature that is often used as a symbol of transformation (due to their ability to be a sea bird and a land-based bird). Not only celebrated for their plucky and joyful disposition, they are often thought to carry much wisdom and can offer much guidance.

Wolf: represents loyalty, strong family ties, good communication, understanding, education and seeker of higher intelligence. Of all land animals, the wolf is found all around the world and is considered to be a connector of all.

Bear: represents authority, good medicine, courage and strength. The bear is believed to be a healer and protector (like a mother bear protects her young). This animal is a symbol for standing up for what is right and fighting for what is good and true.

Beaver: is a symbol of stewardship and safety because he uses his natural gifts wisely for his survival. The beaver is also celebrated as an animal that alters their environment in an environmentally-friendly and sustainable way for the benefit of all their family.

Bison: sustained a way of life for Indigenous peoples for centuries. The bison was used as a food source throughout the years, its hides used in teepees and clothing, and its bones fashioned into tools. This animal symbolizes protection, prosperity, courage, strength, abundance, gratitude and most importantly, stability.

Eagle: is a symbol of strength, authority and power. It rules the skies with grace and great intellect. As a source of inspiration and sometimes used as a guiding force, the eagle teaches individuals about the value of the high road and the unparalleled joys of true freedom.

ENBRIDGE
Life Takes Energy

2022 Indigenous
Reconciliation Action Plan

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The journey continues

2025 Indigenous Reconciliation Action Plan

ENBRIDGE

Acknowledgment

Enbridge respectfully acknowledges that our projects and operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous Nations, Tribes, Governments and groups (Indigenous groups)[1] across Turtle Island[2].

We acknowledge and honor the more than 300 Indigenous groups in Canada and the United States (U.S.) that regularly consult and engage with us. We are deeply grateful for the time, honesty and courage of the Indigenous leaders, Elders and members who have shared their perspectives, interests, stories and traditional and cultural knowledge over the years.

We recognize the injustices Indigenous groups have historically faced, and the ongoing challenges they continue to face today. (Seventy-six years ago, in 1949, Interprovincial Pipe Line Company began the construction of what would eventually become Enbridge's vast portfolio of energy assets and infrastructure today). We acknowledge the lack of inclusion in our collective historical activities within the broader societal context at the time, including the impacts to cultures, languages and socio-economic well-being of Indigenous peoples.

We commit to listening and learning from the lived experiences of Indigenous people and to apply that knowledge with action to continue to forge a path towards reconciliation – in service of ensuring that our future is increasingly inclusive and respectful of Indigenous rights, values and heritage, and in recognizing their vital role and contributions in shaping a more inclusive society.

Over the years, Enbridge has been honored with blankets gifted from Indigenous Groups. The blankets served as a source of inspiration for the design of the 2022 Indigenous Update Report and this star graphic was first unveiled in our inaugural 2022 Indigenous Reconciliation Action Plan. We honor these gifts and their importance to the fabric of our culture, and our dedication to continued learning and inclusion of Indigenous culture, heritage and teachings in our everyday lives.

All figures presented in U.S. dollars use an exchange rate of 1.4 CAD per USD.

[1] In this IRAP Refresh we are using the term "Indigenous groups" when referring to Indigenous Nations, Governments or groups in Canada and/or Native American Tribes and Tribal associations in the United States. We have the utmost respect for the unique rights and individual names of Indigenous groups across Turtle Island. This collective term is used solely for the purpose of the readability of the IRAP Refresh.

[2] The continent of North America is often referred to as Turtle Island by some Indigenous peoples. Both terms appear within this IRAP Refresh, where appropriate.

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Why an Indigenous Reconciliation Action Plan Refresh?

As a North American company, we believe it's important to foster meaningful reconciliation within communities where we live and work. Enbridge published its inaugural Indigenous Reconciliation Action Plan in 2022 (2022 IRAP). Developed in recognition of the Truth and Reconciliation Commission's Call to Action No. 92, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) with respect for and acknowledgment of Indigenous rights and title, treaties, and sovereignty across Turtle Island, and consistent with our Indigenous Peoples Policy (IPP), it has served as the roadmap on our journey towards reconciliation over the past two years. While we have made progress towards our commitments and traveled further along the path to reconciliation, the journey continues.

This IRAP Refresh offers a chance to reflect on the engagement, listening and learning that have taken place over the past two years, review our progress on the commitments made in 2022, and renew our focus on both individual and collective efforts to advance truth and reconciliation.

About the artist

Jason Carter is an Indigenous sculptor, painter, illustrator and public artist from the Little Red River Cree Nation at John D'Or Prairie, Alberta, and a Distinguished Alumni of MacEwan University. Jason has major permanent installations in both the Calgary and Edmonton International Airports, and his sculpture and canvas artwork are displayed in many public places (NAC, AFA, YWCA Calgary and Edmonton, Travel Alberta, Wood Buffalo Region, Stantec, Banff Caribou Properties, Microsoft and Canada Goose), and private collections globally.

In 2019, Jason was commissioned by the Museum of Aboriginal Peoples' Art and Artifacts of Canada to create three paintings (two 79" x 29" and one 58" x 29") to be permanently installed in the museum's entrance. Jason is the lead sculpture artist for *In Search of Christmas Spirit*, an immersive sculpture exhibit in Banff, Alberta where he created 12'-to-18'-tall sculptures of bears, wolves and bison lit from within like a lantern. He worked alongside Banff & Lake Louise Tourism, and Parks Canada, to complete this initiative. In 2021, Jason created wâpos; another large-scale sculpture installation celebrating the rabbit in Churchill Square; and Winter Solstice, which brought to light the importance of solstice and the passing of the sun and moon in winter to Indigenous peoples. Most recently, Jason was commissioned by Hockey Canada to hand paint 150 hockey sticks to be gifted to the player-of-the-game recipients during the IHF's world junior championship tournament in August 2022.

Jason's beautiful artwork was a central part of Enbridge's 2022 IRAP design. We are honored to collaborate with him again on this IRAP Refresh.

About Enbridge

Enbridge is a leading North American diversified energy company, headquartered on Treaty 7 lands and a portion of the Métis Homeland in Calgary, Canada. We operate locally, living and working in the communities near our projects and operations. Enbridge has additional major offices across Turtle Island in Houston, Edmonton, Toronto, Duluth and Chatham.

We safely and reliably connect millions of people to the energy they rely on every day, delivering the energy that fuels people's quality of life through our North American natural gas, oil or renewable power networks and our growing European offshore wind portfolio. We continue to invest in modern energy delivery infrastructure, advancing new low-carbon energy technologies including hydrogen, renewable natural gas, and carbon capture and storage, and are committed to reducing the carbon footprint of the energy we deliver. Our goal is to achieve net-zero greenhouse gas emissions from our operations by 2050[3,4].

North America is blessed with resources, cleaner energy and innovative people who can build and create the energy needed around the world. At Enbridge, we value Safety, Integrity, Respect, Inclusion and High Performance. Above all else, we aim to make a difference, economically and socially—as an industry leader, as a responsible corporate citizen, and as an exceptional employer. Our dedicated team of more than 15,500 employees, mainly in Canada and the U.S., is passionate about upholding these values, contributing to a positive culture than enables us to perform to our full potential, and living our values in support of our communities, the environment and each other. To learn more, visit us at enbridge.com.

Message from our President and CEO

At Enbridge, we are deeply committed to reconciliation. We have learned that what we do today impacts the next seven generations, and we have a responsibility to preserve and care for the land, learn from her original inhabitants and move forward together in the spirit of healing, reconciliation and partnership. We take these responsibilities seriously. Our inaugural 2022 IRAP and its 22 commitments served as a guiding light in our company-wide commitment to advance reconciliation.

As we pause and reflect on our reconciliation journey, I am proud of the dialogue that has taken place, the listening and learning that has occurred, and the work that has been done. We have made great strides, including: enhanced engagement with Indigenous thought leaders through our sharing circles, roundtables and the seven-member Indigenous Advisory Group; 100% employee participation in Indigenous cultural awareness training; and the advancement of economic reconciliation through the formation of new equity partnerships and C$2 billion (US$1.4 billion) in Indigenous spend to date.

> President and CEO Greg Ebel stands between key members from the Calgary Chapter of our Indigenous Employee Resource Group – Edie Severight at left, and Mark Shilliday at right.

But the work is not done. While we recognize there is still a long road ahead, we remain focused on fulfilling both our new and renewed commitments. We are dedicated to early engagement and meaningful, respectful dialogue, and we remain steadfast in our responsibility to empower and build vital economic relationships as we move forward together.

Greg Ebel, President and CEO

[3] GHG emissions included within our targets are from assets over which we have operational control (Scope 1 and Scope 2 emissions). Projected reductions of GHG emissions intensity and absolute emissions is relative to the 2018 baseline year. For more information, see our Sustainability Report.

[4] Absolute emissions.

Where we are now—our journey continues

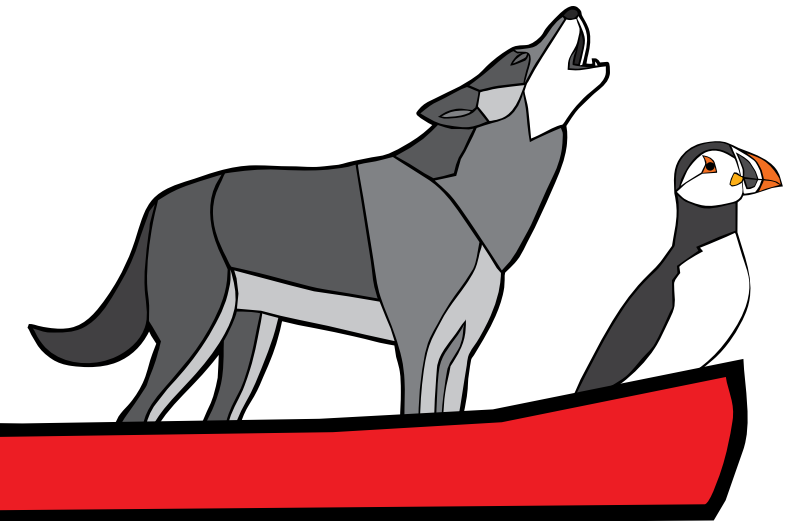
Our inaugural 2022 IRAP included 22 commitments, and associated actions, set forth to advance truth and reconciliation. Through the 2022 IRAP, Enbridge outlined objectives to create opportunities – for dialogue, for listening, for knowledge transfer, and for collaboration and partnership with Indigenous groups. The commitments permeated across each of our four businesses within Enbridge, transcended geographic borders and required us to focus holistically on our role as an energy company whose projects and operations span Indigenous groups across Turtle Island. The 2022 IRAP has served as a powerful tool for alignment within Enbridge on reconciliation and with Indigenous groups on shared interests.

Two years later, this important work continues.

Many of the commitments we made in 2022 are enduring. They contribute to meaningfully and respectfully embedding Indigenous teachings, knowledge and inclusion into our corporate culture. These include commitments such as: ensuring our employees participate in Indigenous cultural awareness training; forming an external Indigenous Advisory Group; and formalizing processes and strategies for Indigenous economic participation. While we may have "achieved" these commitments, they are not done. And they are not forgotten. They have become the new baseline for how we do business and will be maintained to pave the path we walk as we forge ahead on this journey.

In addition, and in conjunction with input from Indigenous groups, our IRAP Working Group, the Indigenous Advisory Group, employees and our Executive Leadership Team, we have renewed or refreshed some of our 2022 commitments to continue our work in these areas, and also set new commitments to strive towards over the next three years and beyond. Seeking truth, advancing reconciliation and walking this path is as much about the journey as it is about the destination. While we have made progress, there is more work to do.

Read on for comprehensive reporting on the progress made against our 2022 IRAP commitments, a list of the commitments we have achieved beginning on page 6, and new and refreshed commitments beginning on page 9.



"Seeking truth, advancing reconciliation and walking this path is as much about the journey as it is about the destination. While we have made progress, there is more work to do."

IRAP commitment and focus

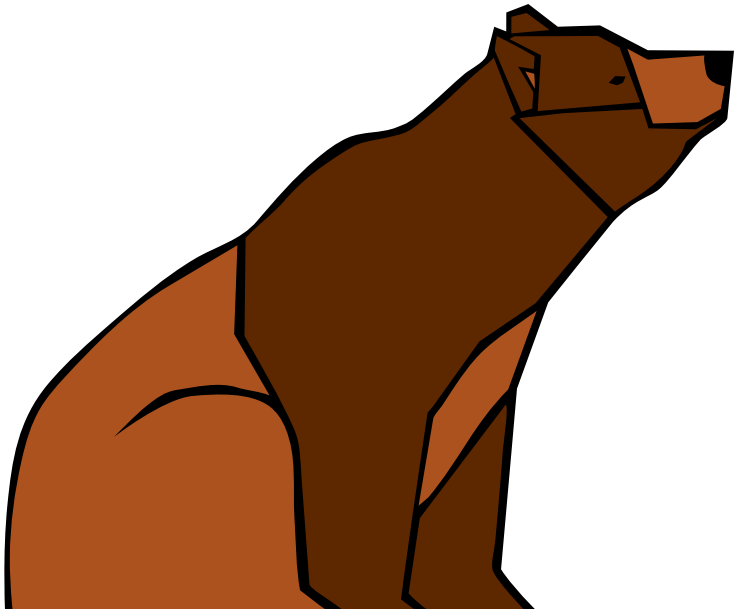
At Enbridge, our core values – Safety, Integrity, Respect, Inclusion and High Performance – reflect what is truly important to us as a company. These values represent the "north star" for our organization, a constant beacon by which we make our decisions, as a company and as individual employees, every day. In 2023, Enbridge added high performance as a new value – recognizing the commitment of our people to set Enbridge apart as a recognized industry leader in a wide variety of areas, including reconciliation. We align to deliver results on things that matter, embrace change, take measured risks and adapt to continue the journey.

Our name, Enbridge, has long conveyed our commitment to being a bridge and playing our part in the energy transition. We recognize we have an important role to play in building bridges toward reconciliation and in collaborating with Indigenous peoples on the energy transition as we seek to be the first-choice energy infrastructure company in North America and beyond.

> **"We believe we can achieve more together—collaboratively, respectfully, purposefully and transparently."**

Our vision for this IRAP Refresh is that it will:

- Guide us on our continued journey to reconciliation
- Unite and focus us in our efforts to continue to build and nurture respectful and mutually beneficial relationships with Indigenous peoples
- Enable us to collaboratively create a safer, more accountable, respectful, sustainable and inclusive future for seven generations[5] and beyond



[5] "Seven generations" is an Indigenous sustainability principle that says that we should consider how every decision will impact and affect those seven generations into the future.

2022 IRAP—progress on our commitments

We are proud of the progress made over the past two years. Since the 2022 IRAP was published, we have seen a shift occurring: what were once targets to strive for are now processes central to how we operate. While there is more work to do, we remain committed to continuing this journey.

Commitments achieved

12 **commitments were achieved** out of the 22 commitments outlined in our 2022 IRAP. Of those 12 commitments:

5 **were achieved and integrated**; these 2022 IRAP commitments achieved over the past two years are now embedded in our corporate DNA. They form the new base standard for how we conduct our business, and we expect them to be continued as such in perpetuity. As such, they are not included in the IRAP Refresh commitment tables.

7 **were achieved and ongoing**; these 2022 IRAP commitments were achieved over the past two years and maintained in this IRAP Refresh with refreshed goals and details. These are identified in the IRAP Refresh commitment tables as "Refreshed" commitments.

The table below outlines these "achieved and integrated" and "achieved and ongoing" commitments.

	2022 Commitment	Status	Achievements
Pillar 1	Ensure 100% of Enbridge's employees complete Indigenous awareness training	✓	• Incorporated cultural awareness training during onboarding process for every new Enbridge employee • Maintaining Indigenous cultural awareness training as a requirement for all employees and contractors that interact with Indigenous people and communities or work on projects that impact Indigenous communities. Training will also be available to others who wish to have a deeper understanding of these communities
Pillar 2	Develop an incremental formal mechanism for Indigenous groups to provide feedback to Enbridge	✓	• Established the Indigenous feedback mechanism in 2023 • Maintained feedback mechanism an ongoing basis: (email: indigenous@enbridge.com and phone number: 1-855-459-0710)
Pillar 3	Revise and formalize Indigenous financial partnership processes that encourage strategies to provide opportunities for Indigenous economic participation	›	• Established an Indigenous Financial Partners Working Group • Established four equity partnerships since 2022 • Maintaining commitment to Indigenous equity partnerships

✓ **Achieved and integrated** › **Achieved and ongoing**

	2022 Commitment	Status	Achievements
Pillar 3	Advance opportunities for Indigenous businessess to participate in Enbridge's supply chain		• Established and conducted eight information sessions • Established support mechanism for Indigenous businesses • Maintain information sessions and support mechanism
Pillar 3	Advance Indigenous procurement spending		• Achieved C$2.757 billion (US$1.97 billion) spend to date • Aspiration: additional C$1B (US$714 million) between 2023 and 2030
Pillar 5	Report and disclose progress on IRAP commitments in the Sustainability Report		• Established annual disclosure in our 2022 Sustainability Report • Updates disclosed in 2023 Sustainability Report • Maintain disclosure in our annual Sustainability Report
Pillar 5	Facilitate a thought leader roundtable related to Indigenous inclusion and perspectives in sustainability strategy and policies		• Completed • Held thought leader roundtable in Q4 2022 • Maintain thought leader roundtable in 2025
Pillar 5	Refresh IRAP commitments and goals every two years		• Achieved IRAP commitment refresh within time frame • Maintained IRAP commitment refresh to every three years
Pillar 6	Establish an Indigenous Advisory Group (IAG)		• Established IAG terms of reference in 2023 • Maintain regular meetings
Pillar 6	Ensure executive sponsorship and commitment to achieving IRAP goals		• Established Reconciliation Senior Vice President Steering Committee • Maintained quarterly updates for the Executive Leadership Team sponsors
Pillar 6	Ensure IRAP implementation and support mechanisms are established and aligned across the company		• Established IRAP Core Working Group • Maintain IRAP implementation committees
Pillar 6	Continue to conduct Indigenous Sharing Circles with participation from Executive Leadership Team		• Established quarterly Indigenous Sharing Circles • Maintain quarterly Indigenous Sharing Circles with employees

About this IRAP Refresh

In this IRAP Refresh, commitments in the tables below are identified in one of two categories:

Refreshed: 2022 IRAP commitments are refreshed and strengthened with enhanced targets or goals to challenge us to lean in further to advance reconciliation.

New: Net new commitments which were identified through learning and engagement as we navigated the last two years of this journey.

In line with our 2022 IRAP, this IRAP Refresh is organized into six key pillars, outlining 20 new or refreshed commitments. Detailed information and targets are provided on the following pages.

The six key pillars are central to our priorities and form the foundation of our commitment to reconciliation and have not changed since our initial 2022 IRAP was published. The pillars are designed to endure, and they reflect the essential components that guide us on this journey. Each pillar is supported by certain commitments, and associated tools, mechanisms and actions.

We will continue to publicly report on progress against these commitments annually in our Sustainability Report.

SIX PILLARS

1
People, employment and education

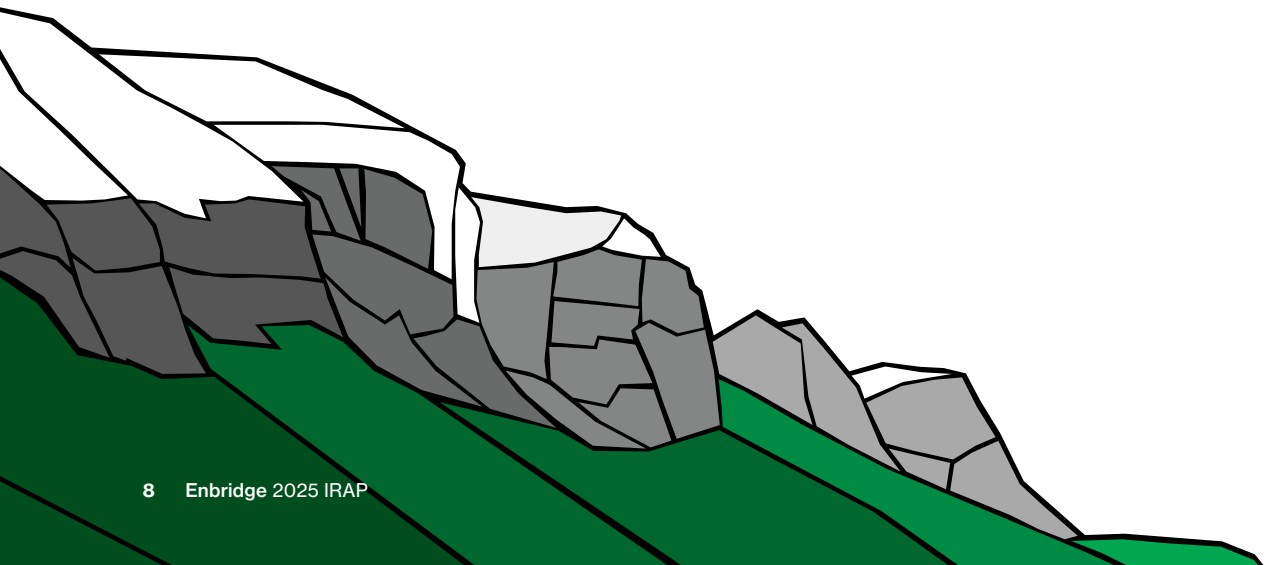
2
Community engagement and relationships

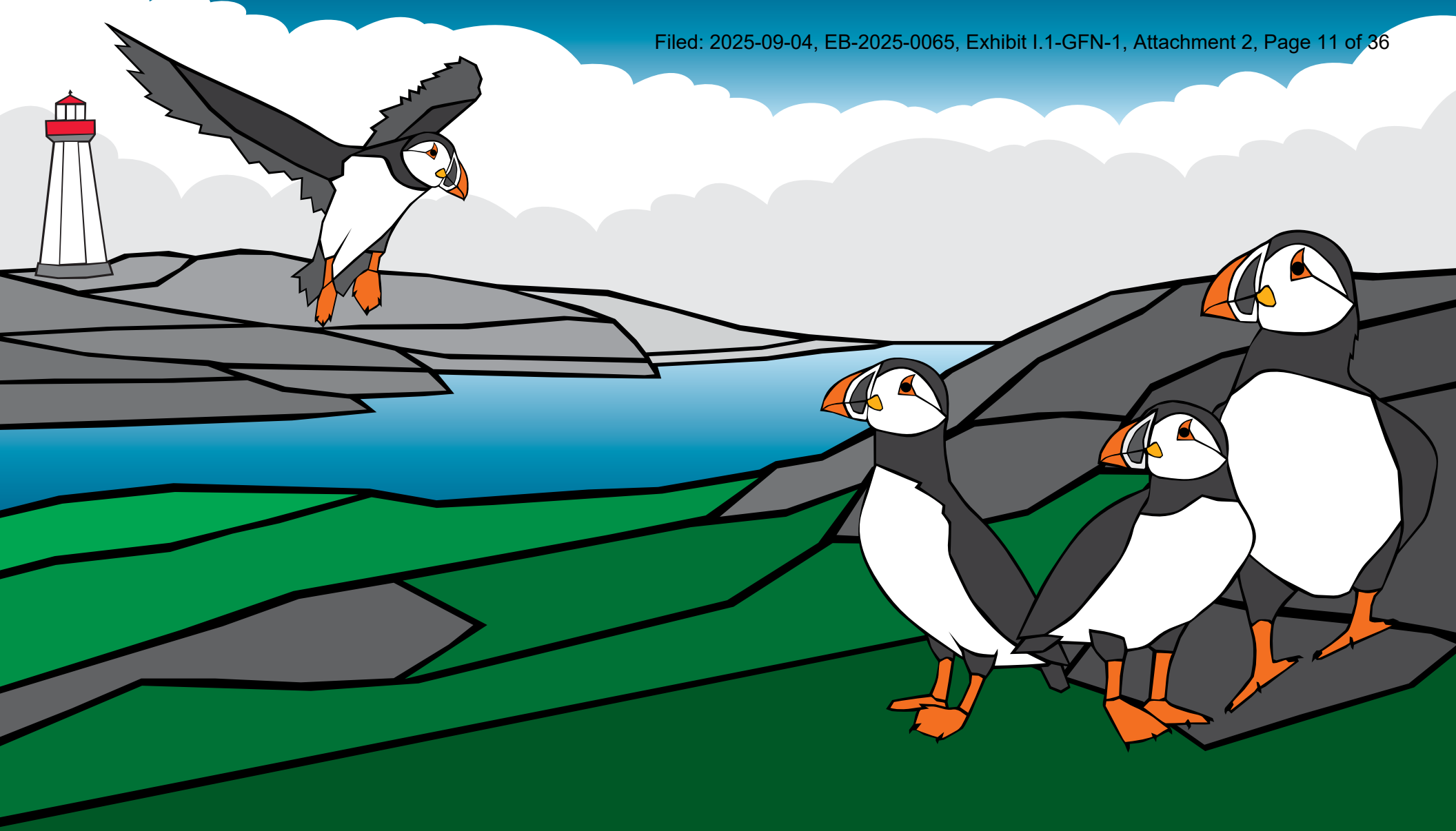
3
Economic inclusion and partnerships

4
Environmental stewardship and safety

5
Sustainability, reporting and energy transition

6
Governance and leadership





PILLAR

1 People, employment and education

PILLAR 1

People, employment and education

Enbridge is committed to creating and nurturing organizational structures that support opportunities to attract, retain and develop the skills of Indigenous people at all levels and in positions that make Enbridge the place to build their careers in a culturally supportive work environment.

Commitment	Details	Goal	Timeline
Talent attraction and recruiting			
Establish flexible work placements and opportunities for Indigenous people that account for regional and cultural considerations across Canada and the U.S.	• The Indigenous Employment Plan is led by an internal multidisciplinary team focused on improving the cultural consideration, working experience and hiring outcomes for Indigenous peoples. • Continue to identify and resolve employment barriers for current and future Indigenous employees.	• Implement the Indigenous Employment Plan to account for Indigenous culture, regional/remote considerations and legal considerations, as appropriate. • Continue education for U.S. and Canadian employees about expanded cultural flexibility within designated leave programs and reinforce that this exists with U.S. employees. • Host a minimum of four listening sessions with Indigenous employees across Canada and the U.S. to understand top priorities and potential barriers to inclusion in the workplace. • Refresh Indigenous Employment Plan based on feedback received within listening sessions.	Refreshed commitment 2025 – ongoing
Continue to seek and strive to increase Indigenous representation in Enbridge's permanent workforce.	• Work with existing and new Indigenous partners to identify current opportunities and key growth areas for employment and skills development. • Grow talent pool and implement Indigenous recruitment strategies. • Recent large acquisitions have contributed to a growing U.S. employee base.	• Continue to engage with vendors, post-secondary institutions, employment centers and urban Indigenous recruitment partners to promote Indigenous recruitment. • Attend at least 12 Indigenous-focused career fairs throughout Canada and the U.S. annually. • Continue to strive for a workforce more reflective of the communities in which we operate.	Refreshed commitment 2025 – ongoing Canada 2027 – U.S.

New commitment Refreshed commitment

Commitment	Details	Goal	Timeline
Continue to review internal hiring processes and develop human resource capability to ensure all perspectives are reflected through attraction/retention lifecycle.	• Formalize Indigenous attraction and retention programs, focusing on cultural awareness, job advertising, partnerships and other regionally relevant cultural considerations. • Ensure that Indigenous cultural perspectives and priorities are reflected throughout talent acquisition process(es). • Conduct regular training with Talent Acquisition team on ways to conduct culturally inclusive interviews. • Ensure job postings contain inclusive language and seek opportunities to consider culturally relevant transferable skills, such as experience in local Indigenous government, alongside other qualifications.	• Review and, where appropriate, update internal hiring processes. • Conduct ongoing and regular training with Talent Acquisition team related to hiring practices. • Evolve current Indigenous attraction/retention approach as needed to ensure they continue to meet the needs of candidates and internal partners. • Continue to adjust job descriptions and job postings, by leveraging content review tools and engaging with internal Indigenous expertise.	2025 – ongoing
Talent experience and development			
Promote participation among Indigenous employees within Enbridge's development program offerings to support the retention and advancement of Indigenous employees.	• Offer development sessions to support career growth within Enbridge. • Develop and diversify pools of candidates for apprenticeship and internship programs.	• Partner with the Indigenous Employee Resource Group to host career development sessions, including topics such as accessing effective mentorship, coaching and sponsorship relationships.	2025 – ongoing
Cultural support programs			
Continue to develop and maintain cultural support programs to make Enbridge an attractive and welcoming employer for all people, including Indigenous peoples.	• Include and develop Indigenous Employee Resource Groups across the company. • Host programs related to Sharing Circles and Indigenous employee support across the company. • Create culturally inclusive and safe spaces across the company that are supportive and celebrate Indigenous arts and culture. • Provide opportunities for all employees to attend learning events celebrating the rich diversity within Indigenous heritage and culture. • Support and provide access to Elders for consultation, cultural events and for support via the Employee Family Assistance Program.	• Continue to implement and provide cultural support programs. • Integrate Indigenous arts and culture in Enbridge offices and facilities across Canada and the U.S. • Continue to support the Indigenous Employee Resource Groups and ensure employees from all regions and field locations can join.	2025 – ongoing

Commitment	Details	Goal	Timeline
Provide specialized and unique cultural awareness opportunities to Enbridge's Board of Directors and Executive Leadership Team that expand upon the learning from previous cultural awareness training.	• Conduct Indigenous-designed, -led, and -facilitated cultural awareness sessions for the Board of Directors and Executive Leadership Team to create enhanced understanding and awareness of the needs, priorities and interests of Indigenous Communities and Nations.	• Host an annual Indigenous cultural session for Board of Directors and Executive Leadership Team.	Ongoing

2022 – 2024 progress and outcomes:

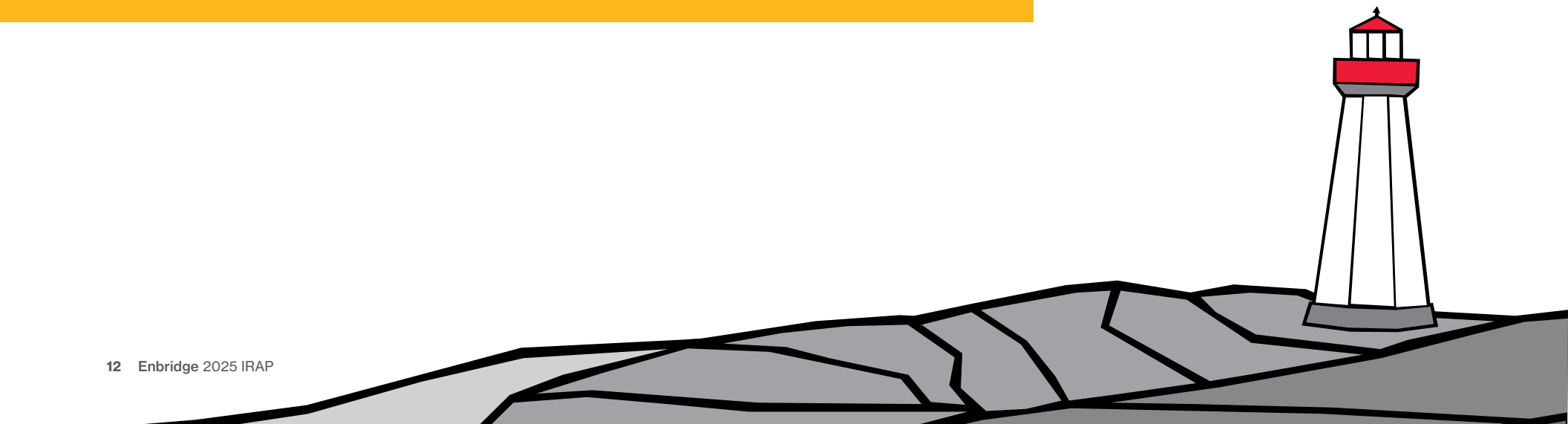
- Creation of Indigenous Employment Plan
- Creation of designated cultural leave program
- Attended a minimum of eight Indigenous-focused career fairs
- Reached 2.8% proportional Indigenous representation by the end of 2024 across the enterprise
- Implemented weekly training for Talent Acquisition
- Expanded Leadership Development Program

Achieved (see table on pages 6 and 7):

- Elder support available through the Employee Family Assistance Program
- Indigenous art present in seven Enbridge offices across Turtle Island
- Indigenous land acknowledgment plaques placed in 20 offices
- Ensured our employees participated in cultural awareness training
  - Every new Enbridge employee now receives cultural awareness training as onboarding requirement
  - Developed and implemented a cultural awareness program for all contractors

See our actions to date:

- 2023 Sustainability Report



Spotlight

Maawanji'we Leadership Program

> Kinomaage gamig and medicine garden at Shingwauk Kinomaage Gamig, Sault Ste. Marie, Ontario, Canada, spring 2024.

An emotional and powerful day of Indigenous cultural awareness education provides leaders an opportunity for learning, reflection and deep understanding of the importance of the continued journey towards reconciliation.

Through Enbridge's journey toward reconciliation, it has been imperative for our employees and our leaders to listen and learn about Indigenous culture, history and teachings.

On various occasions through 2024, cohorts from across Enbridge's Gas Distribution Systems (GDS) and Liquids Pipelines leadership teams in the Great Lakes area in both Canada and the U.S. gathered to undertake an immersive day of Indigenous cultural awareness and knowledge sharing, which included a humbling and transformative visit to the Shingwauk Kinomaage Gamig in Sault St. Marie, Ontario, Canada.

Coordinated and arranged by Kaella-Marie Earle, an Anishinaabekwe (Ojibwe, Odawa, and Potawatomi) from Wiikwemkoong Unceded Territory and Aroland First Nation and a member of Enbridge's GDS team, these learning visits have been a powerful reminder of the history of Indigenous people in Canada and the importance of continuing the journey towards reconciliation and working together to achieve our shared goals.

Founded in 1979, a "Kinoomaage Gamig" (Teaching Wigwam) was originally envisaged by Ojibway Chief Shingwaukonse, also known as Shingwauk, as a way of enabling and synthesizing cross-cultural understanding of traditional Anishnabek and modern European knowledge and learning systems.

Spotlight

Maawanji'we Leadership Program continued

Today, the Shingwauk Kinomaage Gamig, an Anishinaabe post-secondary institute that preserves the integrity of Anishinaabe knowledge and understanding, is set across the street from the former Shingwauk Indian Residential School on what is now Algoma University's Sault Ste. Marie campus.

The day commenced with prayer and song, a smudge with a knowledge holder on the beautiful Shingwauk campus and an opening sharing circle. Throughout the morning, participants were educated on the Seven Grandfather Teachings and traditional language; learned the history of the Anishinaabe and their deep connection to the land; visited a sacred medicine garden filled with the four sacred medicines (sweetgrass, sage, cedar and tobacco); enjoyed traditional Anishinaabe cuisine; and explored the National Chiefs Library and Archive, a center focused on the preservation of Anishinaabe knowledge.

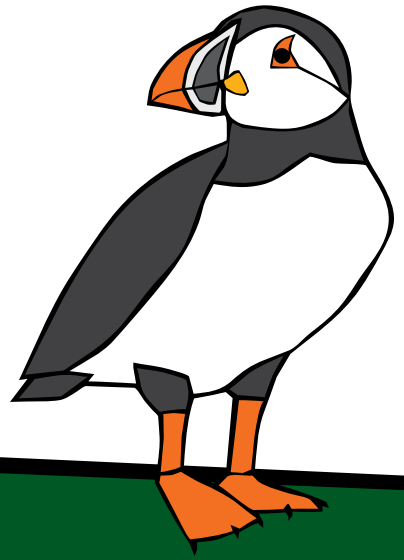
Throughout the afternoon, the team spent time visiting the former residential school and cemetery, and members were captivated by the deeply personal and moving stories from a residential school survivor.

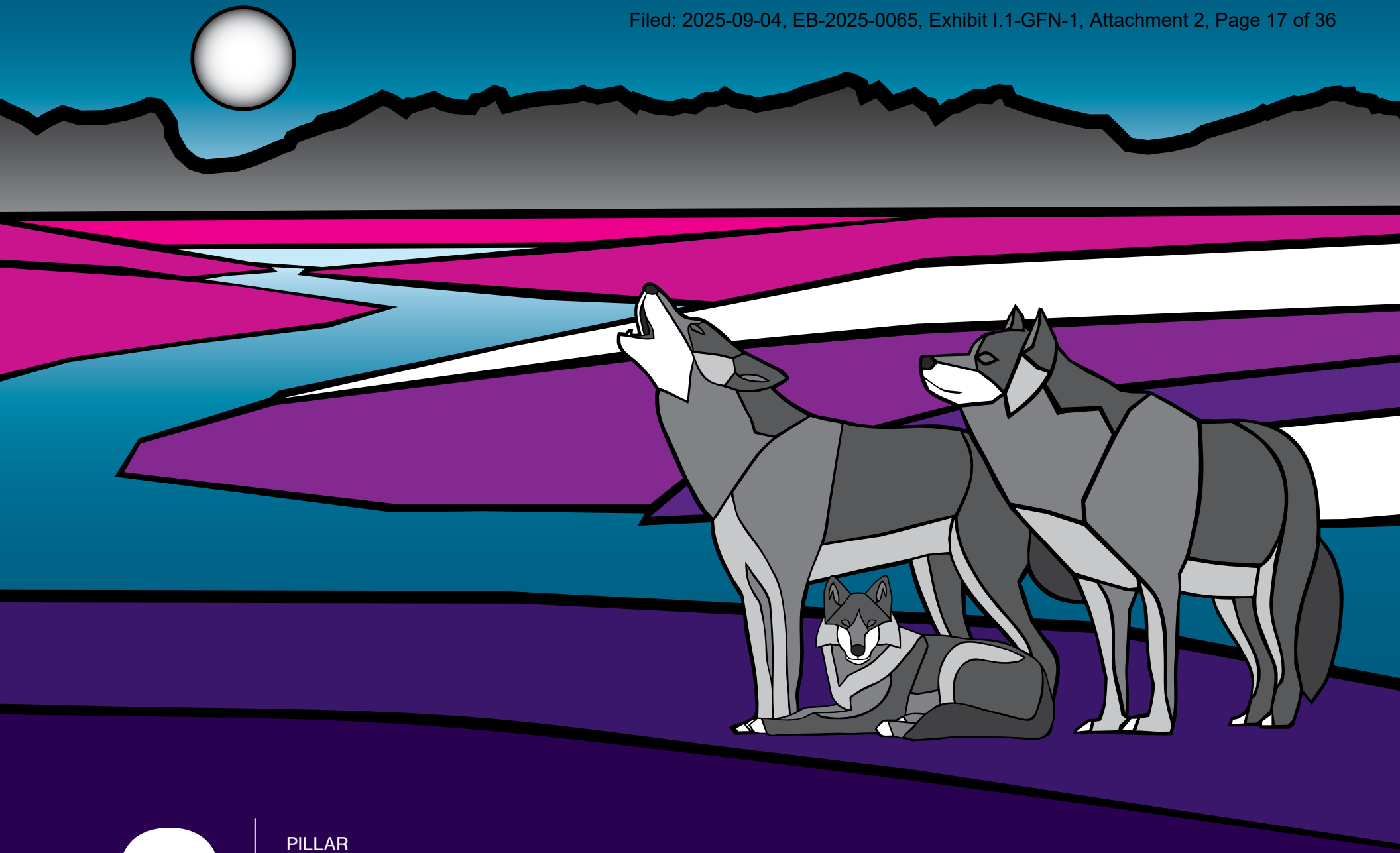
"The opportunity to engage in an immersive and enriching experience such as that provided by the Shingwauk Kinomaage Gamig is one that gives a broader understanding and appreciation of the history of Indigenous peoples in North America and the importance of this journey towards reconciliation," said Mike Moeller, Director of Enbridge's Great Lakes Region. "An emotional and powerful day of learning and reflection, the lessons and stories are ones we take to heart and lean on in our decision-making in both our professional and personal lives."

While the opportunity to visit the Shingwauk Kinomaage Gamig had a profound impact on those who attended, teams are also focused on incorporating and weaving cultural awareness education and opportunities into everyday routines.

The Great Lakes leadership team encourages participation in quarterly wisdom and knowledge circles and cultural sharing opportunities, ongoing engagement and dialogue with local Indigenous groups, and a "Respect Practice" guided by local Elders before commencing certain activities on Mother Earth.

As our journey towards reconciliation continues, it is guided, informed and furthered when our people, collectively and individually, pause to listen, learn and reflect. We are grateful to the Elders and knowledge holders of the Shingwauk Kinomaage Gamig for their time, energy and courage in sharing their personal stories and their traditional knowledge.





2

PILLAR

Community engagement and relationships

PILLAR 2

Community engagement and relationships

Enbridge understands meaningful engagement and respectful relationships are foundational to advancing reconciliation. We are committed to developing strategies, mechanisms and opportunities that support and nurture dialogue and engagement between Enbridge and Indigenous groups throughout the lifecycle of our projects and operations.

Commitment	Details	Goal	Timeline
Community engagement and relationships			
Support communities along our right-of-ways, including Indigenous communities, with community-strengthening initiatives.	• Our aim is to make sure there is at least C$80 million (US$57 million) cumulatively over 2022 – 2027 of overall community spend that supports Indigenous communities to enable them to work with Enbridge.	• Continue to invest at least C$80 million (US$57 million) in cumulative funding. • Provide annual updates on progress toward cumulative C$80-million (US$57-million) investment.	2022 – 2027
Formally establish our Indigenous Lifecycle or relationship-based engagement approach as the Enbridge's standard of practice for engaging with Indigenous groups.	• Building sustainable, respectful relationships and partnerships with Indigenous groups is fundamental to improved alignment of interests and outcomes for both Enbridge and Indigenous groups. • Connecting the Lifecycle guidelines as articulated in the Lifecycle Engagement Framework formally to our IRAP and our Indigenous Peoples Policy drives further internal alignment and consistent standards of engagement practice.	• Embed the Lifecycle Engagement Guidelines Framework as a corporate guideline and within the Indigenous Peoples Policy as part of our commitment to reconciliation.	2026

New commitment **Refreshed commitment**

2022 – 2024 progress and outcomes:

- C$41 million (US$29 million) of C$80 million (US$57 million) provided to date
- Updates are shared annually in the Sustainability Report

Achieved (see table on pages 6 and 7):

- Feedback mechanism established (indigenous@enbridge.com, 1-855-459-0710)

See our actions to date:

- 2023 Sustainability Report

Spotlight

The unique and impactful role of Tribal Liaisons

Enbridge is honored to consult, engage and collaborate with more than 300 Indigenous groups across Turtle Island. This ongoing connection is fundamental to creating important and meaningful relationships with Indigenous groups and imperative to advance reconciliation.

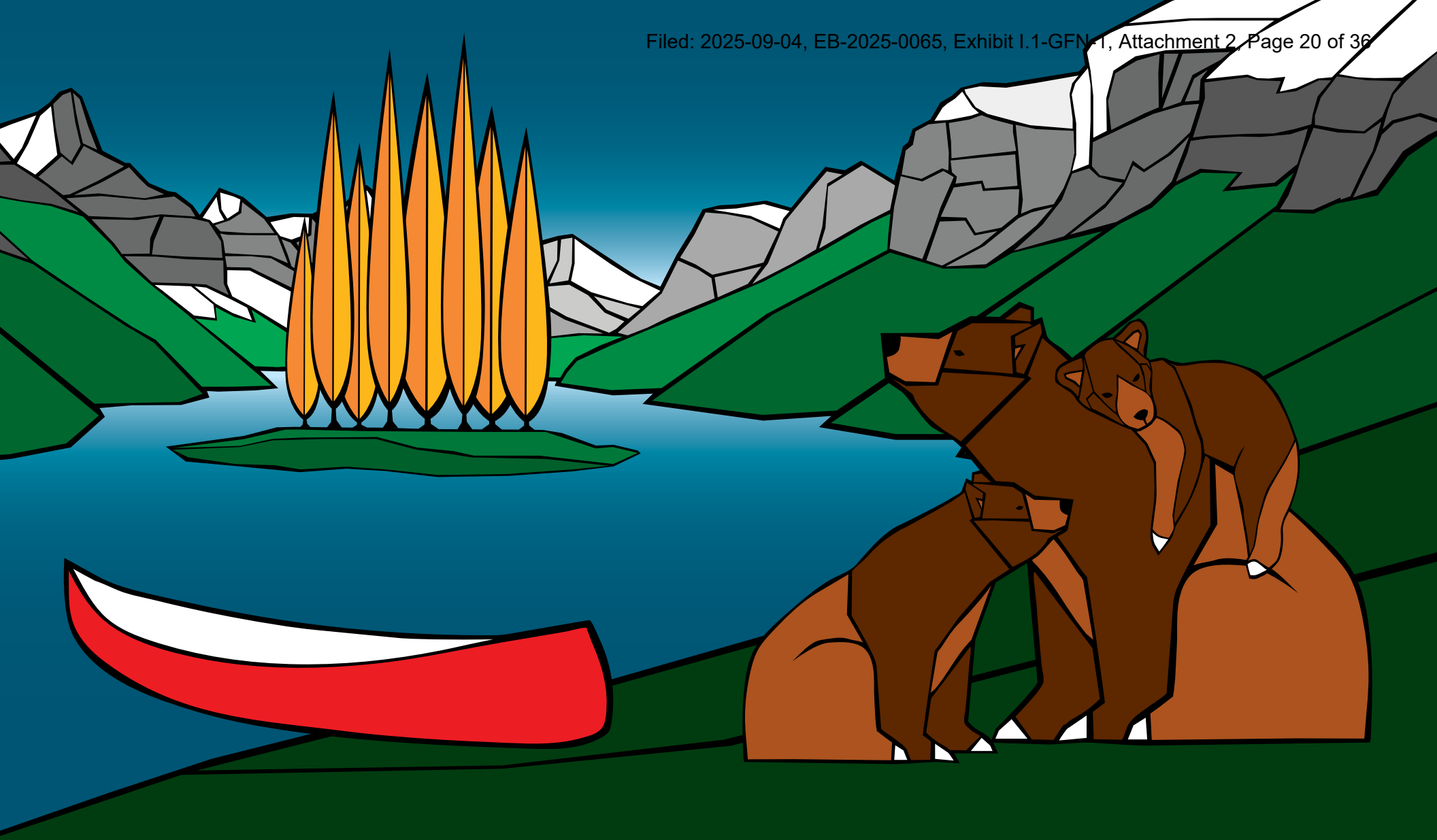
Tribal Liaisons play a unique role within Indigenous communities. Requiring a deep understanding and appreciation for the traditional communities in which they work and for the work that Enbridge undertakes, they are a liaison, a bridge, identifying opportunities for learning, engagement and connectedness.

Diane Pemberton Osceola (Wabegonaquay) is a proud member of the Leech Lake Band of Ojibwe and a Tribal Liaison for Enbridge. Born in White Earth, and currently residing on the Leech Lake reservation in Minnesota, she is a strong and spiritual Anishinaabe Equay (Ojibwe woman), mother, grandmother, great-grandmother, daughter, sister and auntie, as well as a tradesperson and respected businesswoman.

Diane joined Enbridge as a Tribal Liaison in 2019 and, through listening and learning, has been humbly and impactfully identifying important opportunities for connection, education and engagement since that time.

“Liaisons are a conduit for connecting, educating and collaborating with our communities and the people,” said Diane. “I am honored to have the opportunity to identify and support my people, and to enable and guide productive solutions to everyday needs within our community.”

With no two days the same, every day provides an opportunity for creating, maintaining or expanding connections. At the heart of the work of Tribal Liaisons in the U.S. are the relationships they build and nourish. Guided by the Seven Sacred Teachings including love, respect, honesty, courage/bravery, truth, wisdom, and humility, we are grateful and humbled by the work of these important community and team members.



PILLAR

3 Economic inclusion and partnerships

PILLAR 3

Economic inclusion and partnerships

Enbridge strives to create, engage in, and stimulate positive and mutually beneficial financial impacts, opportunities and potential partnerships with Indigenous groups and businesses.

Commitment	Details	Goal	Timeline
Indigenous financial partnerships			
Continue to explore and execute Indigenous commercial equity partnerships.	• Indigenous commercial equity partnerships provide an opportunity to better align interests with Indigenous groups and encourage economic inclusion and reconciliation. • Maintain an internal Indigenous Financial Partnerships Working Group to: – Maintain standards and criteria for commercial partnerships within the company's investment review processes that account for various regulatory, legal and socio-economic considerations. – Share best practices. • Maintain adequate resources to assess and potentially execute Indigenous commercial partnership opportunities. • Engage with Indigenous groups to seek feedback and assess alignment between Enbridge's processes, market opportunities and new opportunities for Indigenous commercial economic participation.	• Maintain an internal Indigenous Financial Partnerships Working Group. • Continue to implement processes and strategies internally to review assets and projects to consider Indigenous commercial equity participation and encourage early engagement with Indigenous groups. • Maintain appropriate dedicated positions and multidisciplinary teams to assess and execute prospective commercial partnership opportunities. • Commit to the development of two additional Indigenous commercial economic partnerships by the end of 2027.	2025 – 2027
Supplier capacity development			
Advance opportunities for Indigenous businesses to participate in Enbridge's supply chain.	• Develop and conduct information sessions to provide guidance and education to Indigenous businesses seeking participation in Enbridge's supply chain. • Continue to provide support for Indigenous businesses navigating Enbridge's procurement system. • Expand current Indigenous business contact mechanism to include options for feedback from Indigenous businesses.	• Develop and conduct at least 10 information sessions over three years. Expand on existing mechanism for Indigenous businesses and communicate enhancement to make Indigenous businesses aware of the mechanism.	2025 – 2027

New commitment **Refreshed commitment**

Commitment	Details	Goal	Timeline
Indigenous procurement			
Advance Indigenous procurement spending[6].	• The 2022 IRAP resulted in an articulated aspiration of an additional C$1 billion (US$714 million) of Indigenous procurement spend between 2023 and 2030. • Progress is reported on annually in our Sustainability Report.	• Execute and report on the progress towards the 2030 aspiration for an additional C$1 billion (US$714 million) of Indigenous procurement spend.	2030
Explore opportunities to remove contracting barriers and support Indigenous contractors.	• Review contracting payment mechanisms and processes to identify and remove barriers to increase participation and positive outcomes for Indigenous businesses.	• Where possible, remove contracting barriers and implement appropriate mechanisms to accelerate payments to Indigenous contractors.	2026

[6] Enbridge takes direction from the leadership of Indigenous groups on which Indigenous members, companies and partners are available for economic inclusion purposes. We also consider economic opportunities for any incorporated business with a combined Indigenous ownership/controlling interest greater than 50% and include the burdened cost of wages for all self-identified Indigenous workers.

2022 – 2024 progress and outcomes:

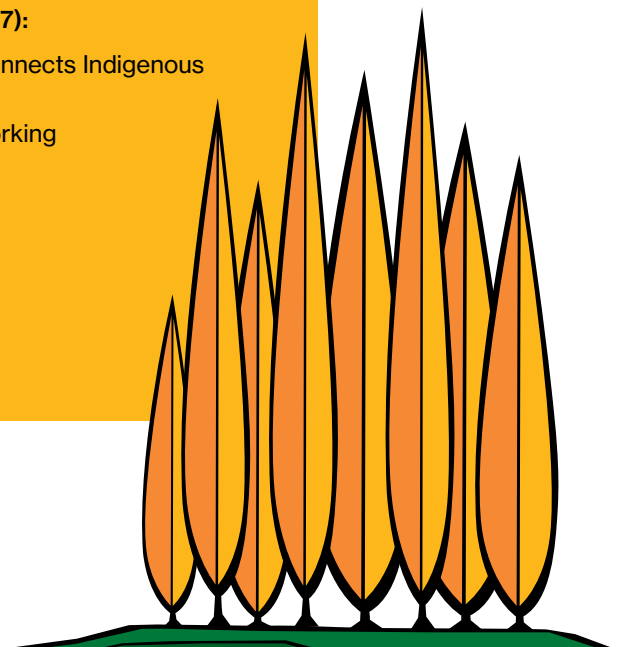
- Four new commercial partnerships established since 2022:
  - Plaza/Wabek Pipeline sale (North Dakota)
  - Wabamun Carbon Hub (Alberta)
  - Seven Stars Energy (Saskatchewan)
  - Athabasca Indigenous Investments Partnership (Alberta):
    > At the time, in 2023, Project Rocket was the largest energy-related Indigenous commercial partnership transaction in North America. It saw communities acquire an 11.57% interest in seven Enbridge-operated pipelines in northern Alberta for C$1.12 billion (US$800 million).
- Eight business information sessions and business summits completed
- Expanded current Indigenous Business contact mechanism (Indigenousbusiness@enbridge.com) to include options for feedback from Indigenous Business to Supply Chain Management Indigenous Engagement (SCM IE)
- In our 2022 IRAP, our aim was to spend an additional C$1 billion (US$714 million) by 2030:
  - Since 2023, we have spent C$757 million (US$514 million)
  - The total Indigenous spend to date is C$2.757 billion (US$1.97 billion)

Achieved (see table on pages 6 and 7):

- Established an email that directly connects Indigenous businesses to SCM IE
- Indigenous Financial Partnership working group established

See our actions to date:

- 2023 Sustainability Report



Spotlight

Plaza/Wabek Pipeline sale: MHA Nation and Enbridge

A precedent-setting sale welcomes the first Tribal shipper on Enbridge's mainline system and represents an investment in generational opportunities for one North Dakota Tribe.

With more than 17,000 enrolled members across nearly a million acres of land, the Mandan, Hidatsa and Arikara Nation (MHA Nation) of North Dakota offers a wide range of services to its people – from finance to child care, from housing to health care, from employment training to cybersecurity to Veterans affairs.

> Mark N. Fox, Chairman of the MHA Nation, left, and Enbridge's Mike Koby sign the sale agreement. Standing at rear are members of the MHA Nation's Tribal Business Council including, from left: Monica Mayer MD, MHA Nation Tribal Councilwoman; Robert White, MHA Nation Tribal Councilman; Bernie Fox, CEO of Thunder Butte Petroleum; and Fred Fox, MHA Nation Tribal Councilman.

The MHA Nation, also known as the Three Affiliated Tribes, also operates an energy division that includes oil production and processing. In June 2023, Enbridge and the MHA Nation announced that Thunder Butte Petroleum Services Inc., a wholly owned MHA Nation subsidiary, would purchase the Plaza/Wabek Pipeline from Enbridge for C$7 million (US$5 million), making MHA Nation the first Tribal shipper on the Enbridge system.

The Plaza/Wabek Pipeline is a six-inch-diameter oil pipeline traveling approximately 50 kilometers (31 miles) from a gathering system in the Plaza/Wabek fields of the Fort Berthold Reservation to Enbridge's Stanley Terminal in Stanley, ND. The line has a transport capacity of 15,000 barrels per day.

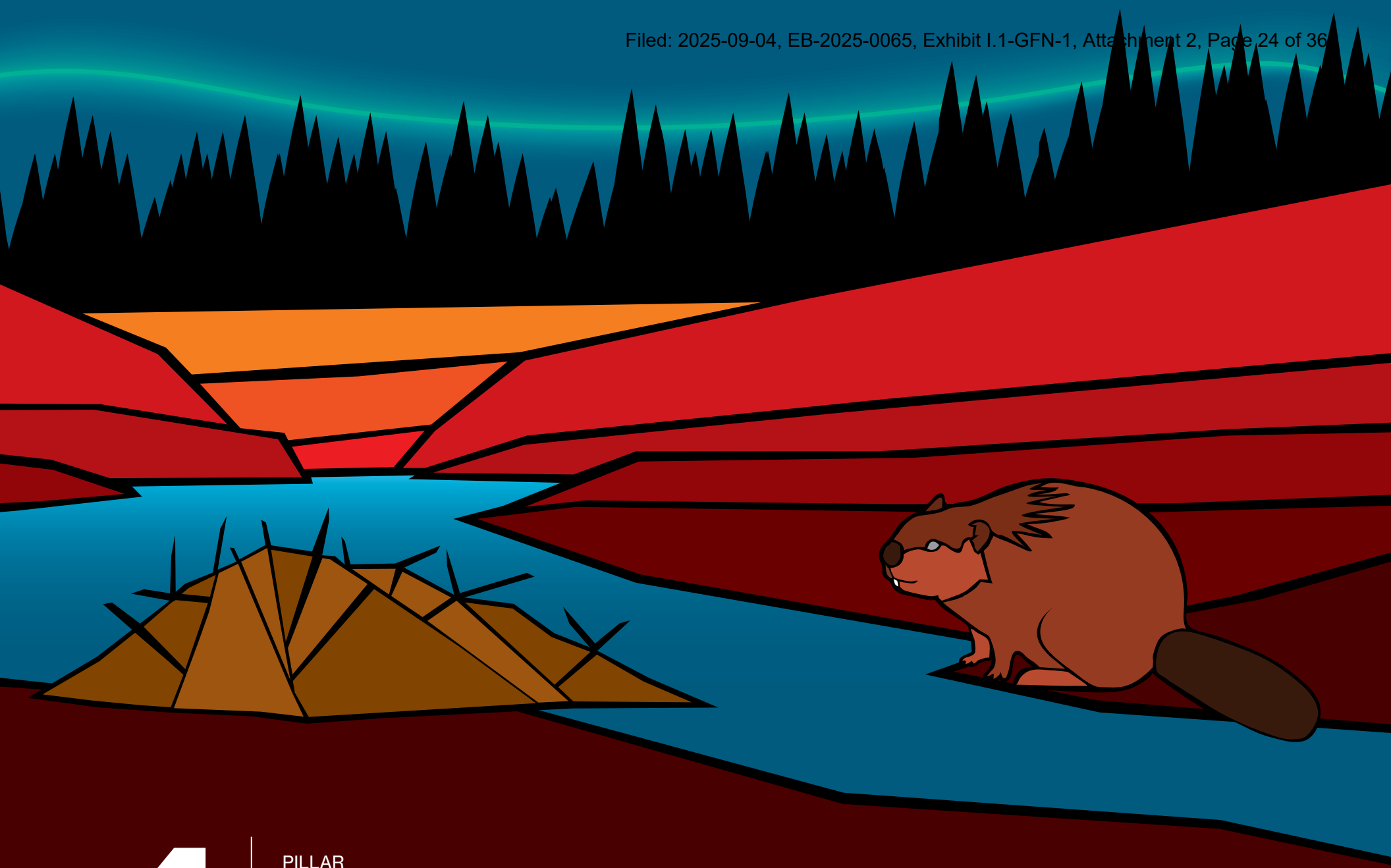
"Becoming one of the first Tribal shippers on the Enbridge system is a win-win situation. Creating an avenue of transmission to move our energy trust assets and resources to the marketplace will help further support various projects, programs and infrastructure, and increase our nation's standard of living," said Mark Fox, Tribal Chairman at MHA Nation. "Enbridge interacted with respect and professionalism throughout the process, and it has been a pleasure to work with them."

Respectful and transparent engagement regarding the long-term goals of both the MHA Nation and Enbridge allowed for productive negotiations, and ultimately for the sale to proceed. In that same spirit, as work continues to finalize the necessary agreements and build the infrastructure required for the projected 2025 in-service date, both parties remain committed to working collaboratively and in the spirit of partnership.

"It was an honor to spend time getting to know the history, culture and people of MHA Nation through our negotiations and discussions on the Plaza/Wabek pipeline sale." said Sam Munckhof-Swain, Enbridge's Director of Indigenous Economic Partnerships. "As they become the first Tribal shipper on Enbridge's mainline system and their crude resources are able to access crucial markets across North America, this creates new generational opportunities for MHA Nation as they invest in their people for future generations."

We are dedicated to exploring and pursuing Indigenous financial and equity partnerships in the regions where we operate. With the support of a dedicated internal Indigenous strategic partnerships team, Enbridge is focused on fostering new partnerships and opportunities with Indigenous groups.

Our commitments under IRAP Refresh Pillar 3 outline the near-term steps we are taking to generate positive, mutually beneficial financial impacts and to create meaningful opportunities and partnerships with Indigenous groups and businesses.



PILLAR

4 Environmental stewardship and safety

PILLAR 4

Environmental stewardship and safety

Enbridge recognizes the strong Indigenous connection to culture and the traditional importance of the land, air, animals and water. We are committed to environmental protection, collaborative stewardship and continued improvement of engagement on, and inclusion of, traditional and cultural knowledge in our plans, projects and operations.

Commitment	Details	Goal	Timeline
Indigenous inclusion and traditional knowledge			
Review and revise Enbridge's approach to Indigenous inclusion in environmental review processes.	• Proactively engage with Indigenous groups to share Enbridge's environmental processes and initiatives, and increase awareness for opportunities to partner with Indigenous organizations for environmental work.	• Provide information on Enbridge's environmental processes and initiatives to identified Indigenous groups. • Strengthen engagement to reflect Indigenous inclusion.	2025 – ongoing
Regionally advance opportunities for Indigenous inclusion in environmental field work.	• Regionally identify and advance opportunities for Indigenous participation in environmental field work. • Engage with Indigenous groups to identify where Traditional Environmental Knowledge (e.g. planning site and facility locations) can be included into land-based development.	• Increase Indigenous involvement in fieldwork. • Identify land-based opportunities considering inputs from Indigenous groups.	2025 – ongoing
Emergency preparedness and pipeline safety			
Continue to share emergency management materials and encourage increased Indigenous awareness in emergency response.	• Continue to engage and share emergency management materials with Indigenous groups. • Continue to generate awareness and provide opportunities for participation in emergency response exercises.	• Continue to share relevant emergency management materials to generate awareness and work with identified Indigenous groups to implement the "Best Practices for Notifications to Indigenous Nations and Communities" regarding Canada Energy Regulators (CER) Reportable Incidents.	2025 – ongoing
Continue to communicate with Indigenous groups regarding emergency and safety mechanisms and approaches.	• Continue to provide notifications to Indigenous groups at the same time as the regulator to ensure they are aware and engaged in the event of a release from our pipeline systems.	• Communicate with Indigenous groups in the event of a release from our pipeline systems.	Ongoing

New commitment Refreshed commitment

2022 – 2024 progress and outcomes

- Assessed current environmental approaches in each region
- Increased Indigenous inclusion in various stages of environmental review processes
- Increased opportunities for Indigenous participation in environmental field work, especially through engagement on projects
- Provided emergency management materials and opportunities to participate in emergency response exercises to Nation emergency coordinators, administrators and leadership
- Hosted tours of key Enbridge operational facilities, which provided an opportunity to share information and answer questions
- Incident communication protocols were developed with some communities near our assets
- 2023 Sustainability Report

Spotlight

Safe Community Grant—Frog Lake First Nation

Engagement and collaboration around safety as a core value creates opportunities for increased and improved community and regional emergency response, connection and security.

At Enbridge, safety is at the heart of what we do. For us, it's more than operational safety. It is also paramount that the communities in which we work and live are safe.

Since 2002, our Safe Community First Responder Program has helped support a wide variety of emergency response needs, from new firehoses, emergency management training, and the purchase of jaws-of-life for fire departments to automated external defibrillators, vehicles, and major financial support of air ambulance services.

Frog Lake First Nation (Frog Lake) is located in remote central Alberta, Canada, 200 kilometers (124 miles) east of Edmonton. Having adequate emergency management capacity within the community is important to the safety, security and peace of mind of its members. To that end, in 2022, Frog Lake began expanding its emergency management capacity, hiring a dedicated Emergency Management Director (EMD) and then applying for and receiving Enbridge Safe Community First Responder Program grants in 2022 and 2023 to contribute to the build of a new community fire hall.

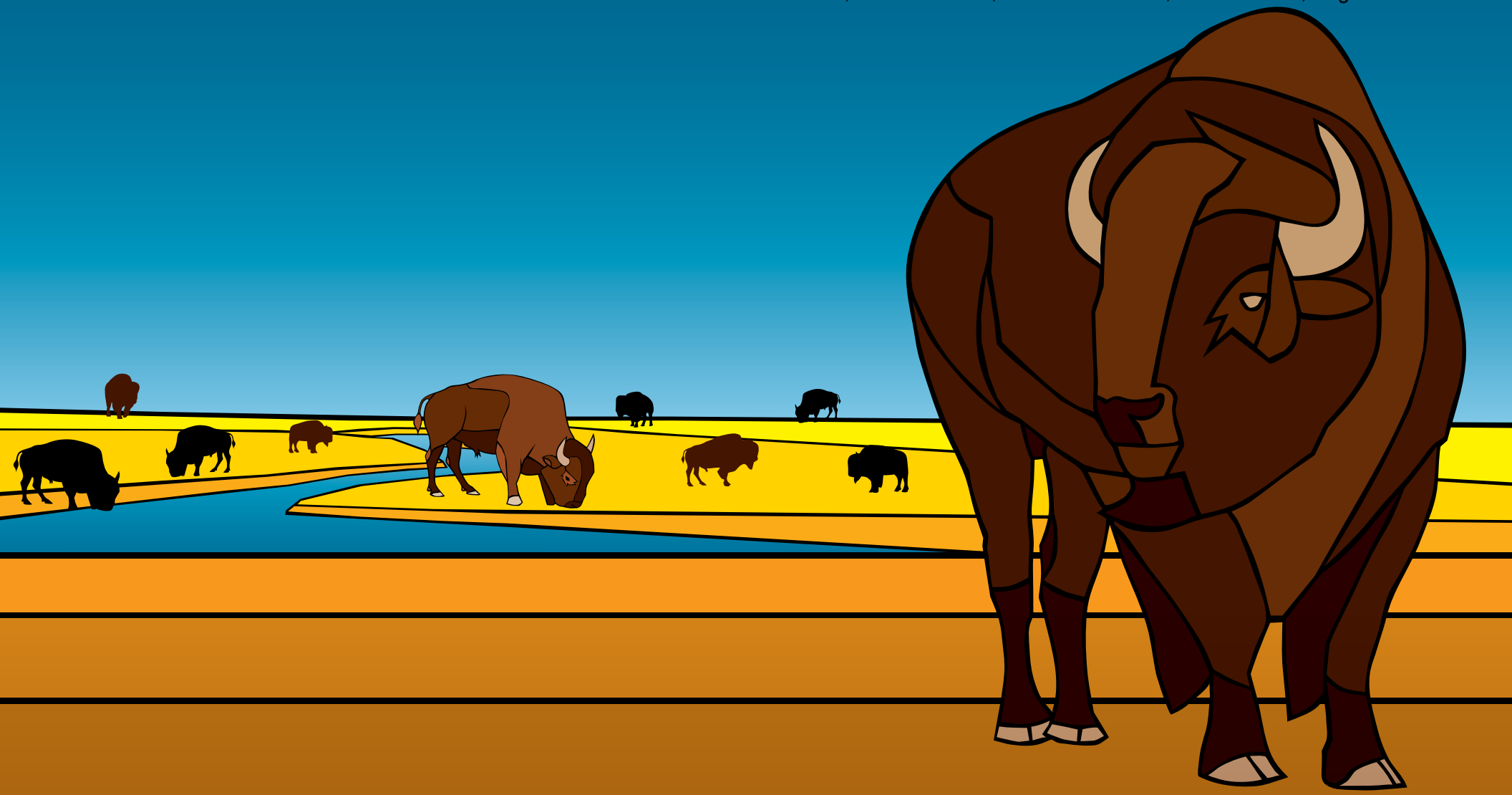
As part of ongoing efforts to continue to enhance emergency response and safety within the community, in summer 2023, Frog Lake identified the need for a reliable and dedicated vehicle for emergency management, response and security patrol in the community, and considered applying for an additional grant to contribute to its purchase.

Through ongoing engagement and dialogue with Enbridge's Community and Indigenous Engagement (CIE) advisor and field operations staff, a process commenced to identify an appropriate Enbridge fleet vehicle being cycled offline for donation to Frog Lake. In September 2024, Frog Lake received the keys to its dedicated emergency management truck.

"We sincerely thank Enbridge for their generous donation of a half-ton truck to our emergency department, which has significantly improved the efficiency and safety of our patrols," said Rocky Wade, Frog Lake EMD. "We deeply appreciate Enbridge's continued friendship and support, and we look forward to further collaboration on initiatives that enhance the safety of both Frog Lake and our neighboring rural communities."

"We are proud to support Frog Lake as they have proactively worked to enhance their capacity and resources for emergency management and response within the community, as well as their crucial role in the broader region," said Dallas Roberts, Enbridge CIE senior advisor. "This increased capacity strengthens vital regional connections, creating a network of support and collaboration between Indigenous and local communities in rural and remote areas of Alberta."

Frog Lake has participated, and continues to engage, in management response training, and with members of Enbridge's CIE and operations teams to identify important priorities for the community, including around our shared core value of safety.



5

PILLAR

Sustainability, reporting and energy transition

PILLAR 5

Sustainability, reporting and energy transition

Enbridge is committed to forming strategies and collaborative partnerships with Indigenous peoples focused on advancing the energy transition to a lower-carbon economy and transparently reporting on our progress against our commitments.

Commitment	Details	Goal	Timeline
Reporting			
Report and disclose progress on IRAP commitments in Sustainability Report.	• Increase transparency by addressing progress of IRAP commitments in annual Sustainability Report. • Explore opportunities to utilize existing platforms to share updates, information and progress directly with Indigenous groups.	• Disclose progress via annual Sustainability Report. • Develop IRAP progress dashboard for the Enbridge website.	Ongoing
Refresh IRAP commitments and goals every three years.	• Refresh IRAP commitments and goals every three years in conjunction with input from Indigenous groups, the Indigenous Advisory Group, employees and Executive Leadership Team.	• Publish updated IRAP commitments and goals every three years.	2025 – ongoing
Sustainability			
Facilitate a thought leader roundtable related to Indigenous inclusion and perspectives in sustainability strategy and policies.	• Identify key organizations/industry partners for inclusion in thought leader roundtable discussion. • Work with roundtable participants to identify relevant topics related to sustainability, climate change, Indigenous perspectives and reconciliation that further support action, identify pathways towards implementation and build capacity within Indigenous groups to support implementation. • Conduct roundtable(s) with participation from Indigenous groups and industry peers.	• Convene at least one thought leader roundtable in the U.S. • Consider the findings and Indigenous perspectives shared at the roundtable(s) when Enbridge sustainability strategies and policies are updated.	2025

New commitment **Refreshed commitment**

2022 – 2024 progress and outcomes

- The 2022 IRAP commitments were assessed in 2024 resulting in the 2025 IRAP Refresh
- Roundtable completed in November 2023
- 2023 Sustainability Report

Reconciliation journey milestone

2001

Enbridge introduces its first **Indigenous Peoples Policy,** which continues to govern our interactions and lays out key principles, such as respect for traditional ways and the land, heritage sites, the environment, and recognition of unique legal and constitutional rights.

2014 – 2019

The largest capital project in Enbridge's history provided a unique opportunity to evolve our Indigenous engagement practices, including improved Indigenous project agreements, monitoring and economic inclusion (C$1 billion (US$714 million) of Indigenous procurement and labor).

In 2017, we committed to expanding our **reporting** on the implementation of our Indigenous Peoples Policy, including the steps we are taking to integrate Indigenous rights and knowledge into our business across Turtle Island.

Also in 2017, we formalized a new, company-wide Indigenous **supply chain process** detailing our socio-economic requirements of contractors.

2018

From 2018 through to the present, our **sustainability reports** have provided an annual overview of our plans, commitments and outcomes concerning Indigenous inclusion.

In 2018, we shared an evaluation and continued to advance our engagement approach with Indigenous groups with the release of a **discussion paper**, *Indigenous Rights and Relationships in North American Energy Infrastructure*.

2019

We finalized our **Indigenous Lifecycle Engagement Framework**, which guides our engagement with Indigenous nations, governments and groups over the life of our assets through direct, regional and landscape-level engagement in areas such as environmental stewardship, cultural protection, training and Indigenous rights and interests.

2022

We updated our **Indigenous Peoples Policy**, which reiterates our commitment to seek the input and knowledge of Indigenous groups to identify and develop appropriate measures to avoid and/or mitigate the impacts of our projects and operations that may occur on their traditional lands.

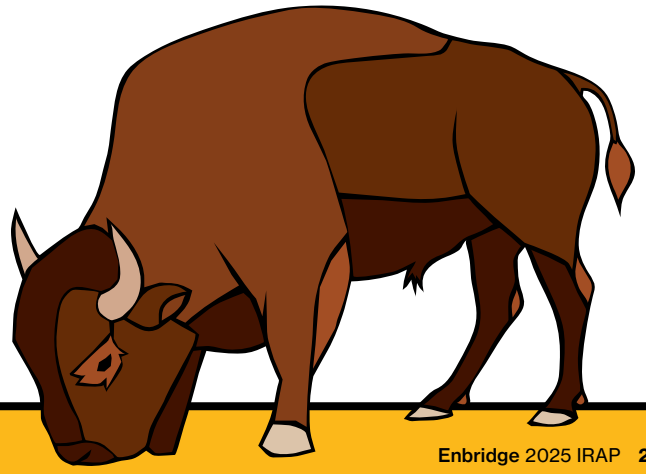
In February, we issued ***Continuing our Path to Reconciliation***, an update on our approach to Indigenous engagement in Canada and the U.S. and committing to developing a Reconciliation Action Plan.

In September, we released our first-ever **Indigenous Reconciliation Action Plan**. One of the first such plans to focus on reconciliation from a North American perspective.

Athabasca Indigenous Investments Partnership: In the fall of 2022, we concluded the largest energy-related Indigenous commercial partnership transaction in North America.

2025

We refreshed our commitments and goals and included an acknowledgment in a new **IRAP** with input from Indigenous groups, the Indigenous Advisory Group, employees and Executive Leadership Team.



6

PILLAR

Governance and leadership

PILLAR 6

Governance and leadership

Enbridge is committed to the creation and support of governance and leadership structures that focus on embedding and promoting accountability for Indigenous engagement and inclusion across the organization. We commit to leading by example and hold each other accountable for the commitments we make on our reconciliation pathway forward.

Commitment	Details	Goal	Timeline
Cultural Awareness			
Conduct Sharing or Talking Circles with Indigenous colleagues and Executive Leadership Team to provide opportunities for continued learning, education and support.	• Maintain and expand participation in Sharing or Talking Circles. Enbridge will look to provide financial support, where appropriate, to remove barriers and encourage participation.	• Conduct quarterly Sharing or Talking Circles which will include Executive Leadership Team participation at least once annually.	Ongoing

New commitment **Refreshed commitment**

2022 – 2024 progress and outcomes

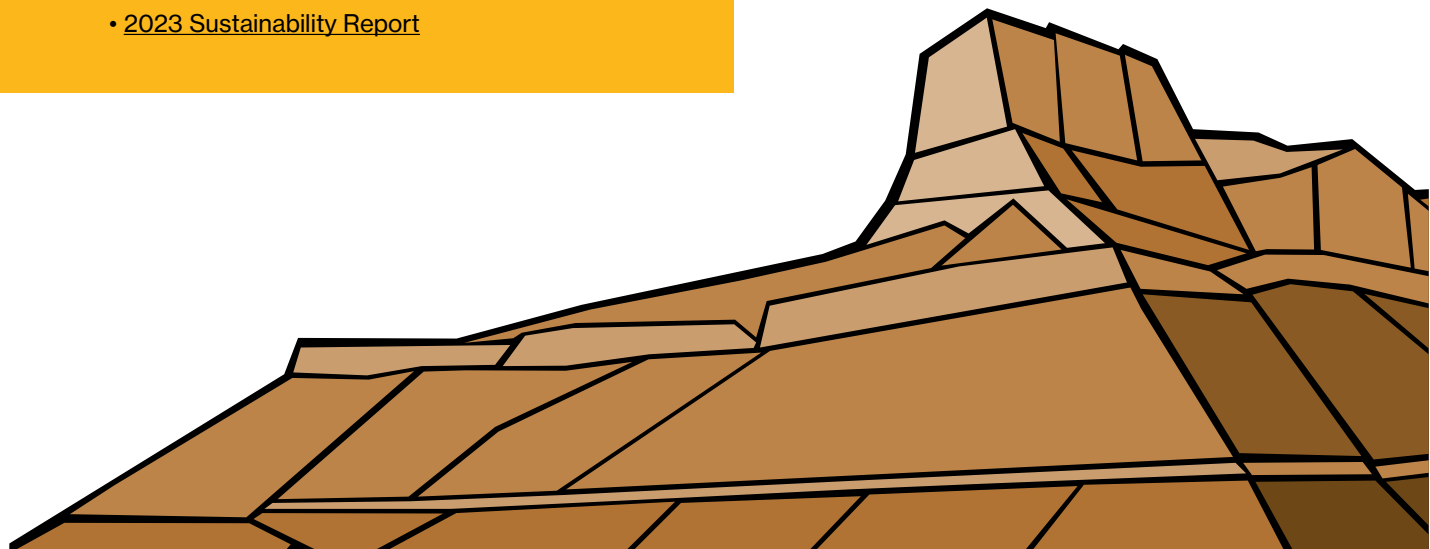
- Quarterly meetings held and will be maintained

Achieved (see table on pages 6 and 7):

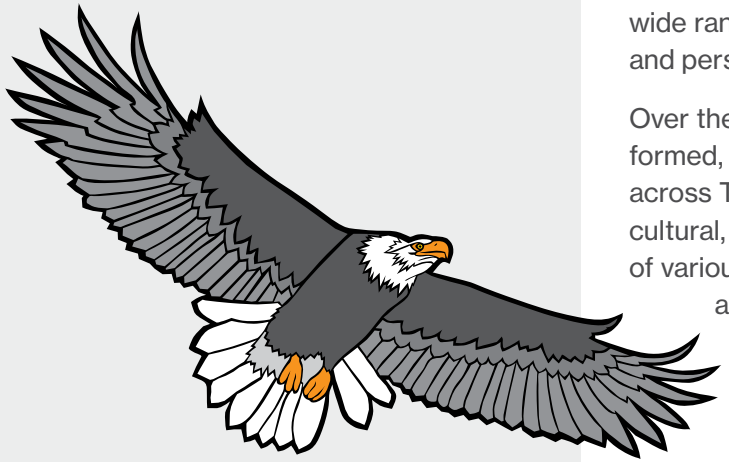
- IAG and terms of reference established in 2023; regular meetings during the year
- Achieved and ongoing:
  - Reconciliation SVP SteerCo., quarterly updates for the Executive Leadership Team sponsors
  - IRAP Core Working Group
  - IRAP Commitment leads for working groups

See our actions to date:

- 2023 Sustainability Report



A commitment to engagement, constructive dialogue and reflection, and the continued journey towards reconciliation.



Spotlight

Indigenous Advisory Group

As part of its commitments outlined in the 2022 IRAP, Enbridge pledged to establish an Indigenous Advisory Group (IAG) to provide advice and Indigenous and/or Tribal insight to executive management. The IAG was to be geographically diverse, representing a wide range of regions, Indigenous groups and perspectives.

Over the past two years, the IAG has been formed, consisting of seven members from across Turtle Island. The members are cultural, spiritual and Indigenous leaders of various ages, with diverse professional and personal backgrounds, as well as differing perspectives and worldviews. Together, they bring a holistic, lifecycle-focused approach to engagement, development and reconciliation.

The IAG meets with members of Enbridge's Senior Vice President Steering Committee – each of whom oversees various Enbridge business units – approximately four to six times per year. The first full year of meetings began in 2024, with sessions held both virtually and in person, led by an independent Indigenous facilitator. Additionally, the IAG engages annually with Enbridge's Board of Directors.

With documented terms of reference, the IAG's work focuses on reviewing, advising and engaging with Enbridge on key business challenges, IRAP commitments and transformative organizational initiatives. Through a shared commitment to open, transparent dialogue and a collective understanding of the ongoing journey toward reconciliation, these meetings offer important opportunities for reflection and constructive conversations.

> **Engagement with the IAG provides unique and invaluable insights into some of Enbridge's greatest opportunities and challenges – both as a company and as individuals. We are deeply grateful for the time and wisdom shared by the traditional knowledge holders, cultural leaders, and business professionals who make up our IAG. Their insights are helping to shape our path forward.**
>
> **– Lisa Barrett**, VP, Talent and Inclusion

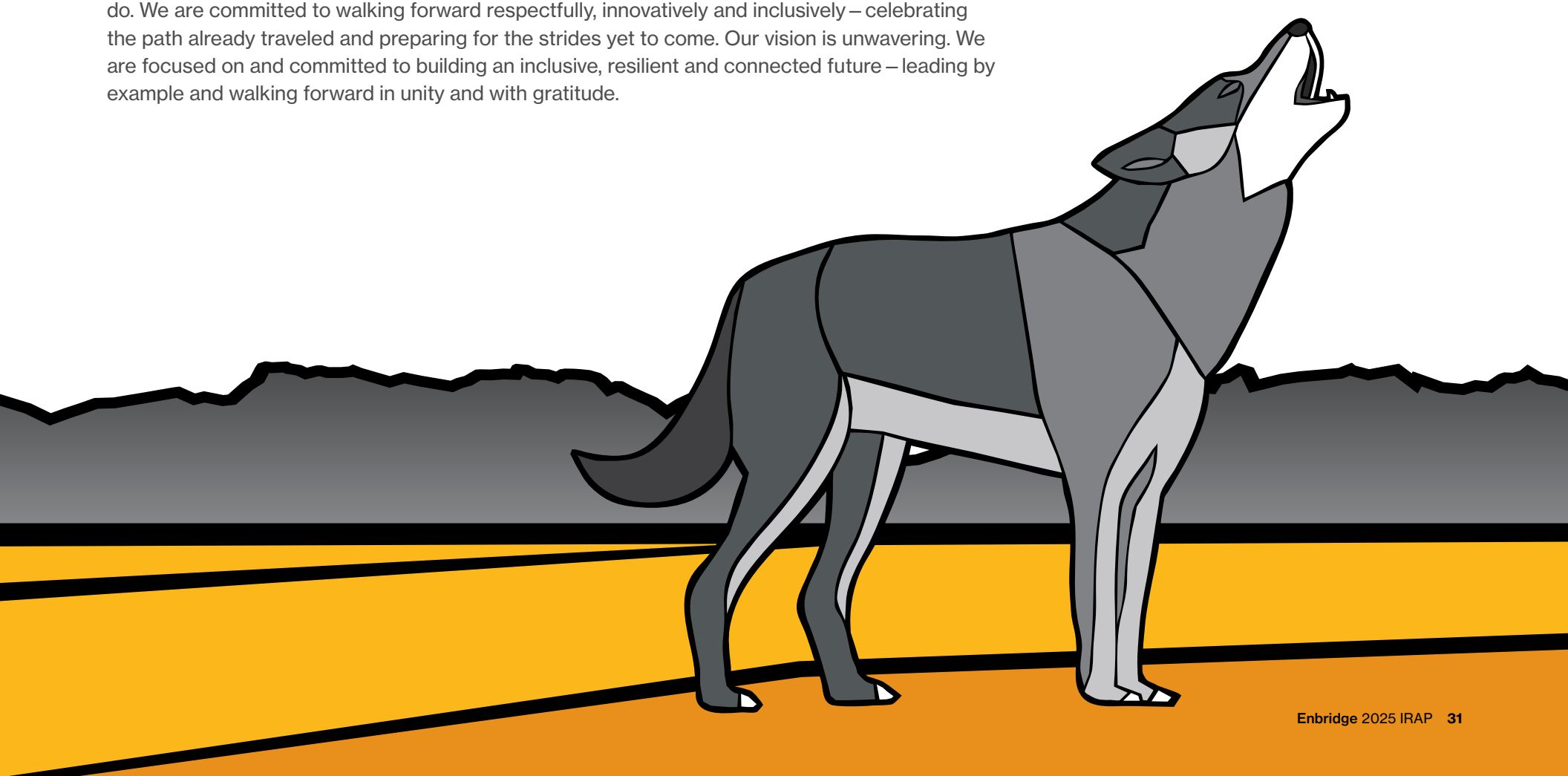
As Enbridge continues on its journey in the spirit of healing, reconciliation, and partnership, we are deeply appreciative of the time, dedication, and leadership of our IAG members. We are also grateful to the many Indigenous groups across Turtle Island with whom we engage regularly. As we move forward, we remain committed to this path with gratitude, respect, and a deep commitment to reconciliation.

The journey continues

Our commitment to this journey is resolute. We continue to strive to create and nurture sustainable, respectful and mutually beneficial relationships with Indigenous groups in areas in which we operate.

Since our inaugural IRAP was published, we have been fortunate to have many opportunities to listen and to learn from Indigenous people across Turtle Island. For each individual giving their time, sharing their deeply personal stories and imparting their knowledge, we are deeply grateful.

We are proud of the progress we have made over the past two years but there is more work to do. We are committed to walking forward respectfully, innovatively and inclusively – celebrating the path already traveled and preparing for the strides yet to come. Our vision is unwavering. We are focused on and committed to building an inclusive, resilient and connected future – leading by example and walking forward in unity and with gratitude.



About the animals

Puffin
An incredible social creature that is often used as a symbol of transformation (due to their ability to be a sea bird and a land-based bird). Not only celebrated for their plucky and joyful disposition, they are often thought to carry much wisdom and can offer much guidance.

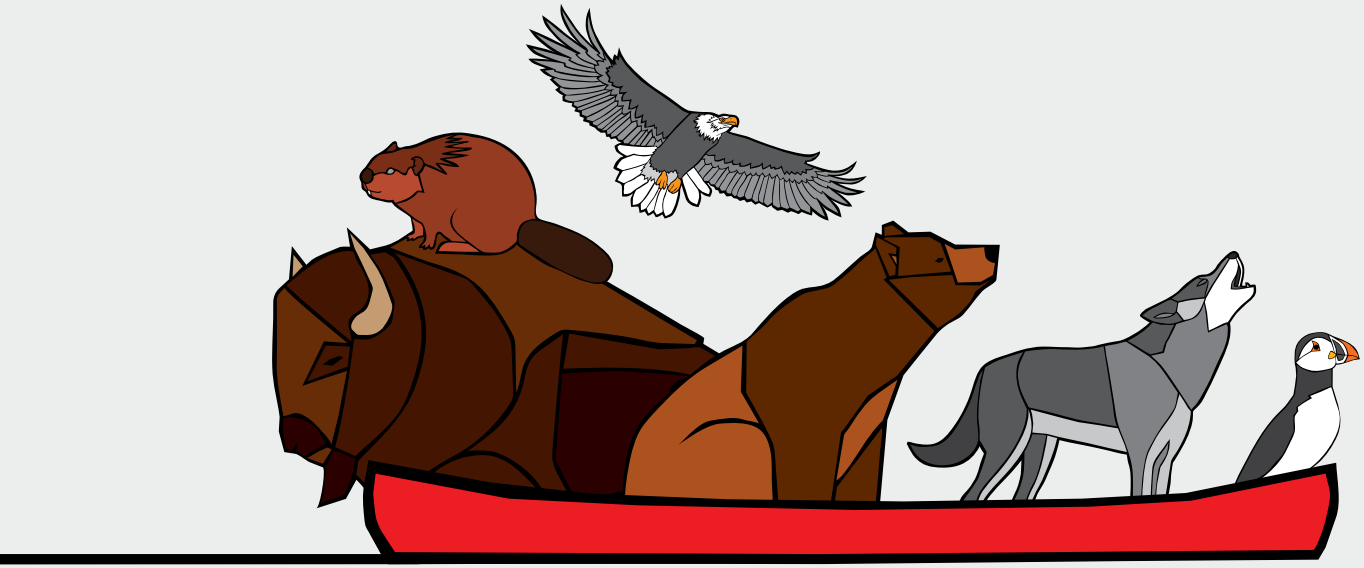
Wolf
Represents loyalty, strong family ties, good communication, understanding, education and seeker of higher intelligence. Of all land animals, the wolf is found all around the world and is considered to be a connector of all.

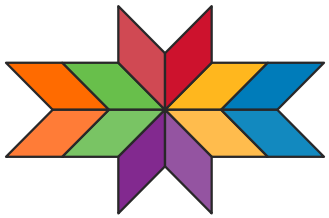
Bear
Represents authority, good medicine, courage and strength. The bear is believed to be a healer and protector (like a mother bear protects her young). This animal is a symbol for standing up for what is right and fighting for what is good and true.

Beaver
A symbol of stewardship and safety because he uses his natural gifts wisely for his survival. The beaver is also celebrated as an animal that alters their environment in an environmentally-friendly and sustainable way for the benefit of all their family.

Bison
Sustained a way of life for Indigenous peoples for centuries. The bison was used as a food source throughout the years, its hides used in teepees and clothing, and its bones fashioned into tools. This animal symbolizes protection, prosperity, courage, strength, abundance, gratitude and, most importantly, stability.

Eagle
A symbol of strength, authority and power. It rules the skies with grace and great intellect. As a source of inspiration and sometimes used as a guiding force, the eagle teaches individuals about the value of the high road and the unparalleled joys of true freedom.





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Calgary, Alberta, Canada T2P 3L8

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enbridge.com/indigenous

Enbridge Inc. Indigenous Peoples Policy

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August 2022

Enbridge Indigenous Peoples Policy

Purpose: Enbridge recognizes the diversity of Indigenous peoples[1] who live where we work and operate. We understand that certain laws and policies—in both Canada and the United States—have had destructive impacts on Indigenous cultures, languages, and the social and economic well-being of Indigenous peoples. Enbridge recognizes the importance of reconciliation between Indigenous peoples and broader society. We are committed to building positive and sustainable relationships with Indigenous peoples, based on trust and respect, and focused on finding common goals through open dialogue.

Enbridge believes: Companies can play a role in advancing reconciliation through meaningful engagement with and inclusion of Indigenous peoples and perspectives in their business activities.

Policy: As an energy infrastructure company whose operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous groups[2] across North America, Enbridge is deeply committed to advancing reconciliation with Indigenous peoples. Our mutual success depends on the ability to build long-term, respectful and constructive relationships with Indigenous groups near Enbridge's projects and operations throughout the lifecycle of our activities. To achieve this, Enbridge will govern itself by the following principles:

Respect for Indigenous rights and knowledge

- We recognize the importance of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) in the context of existing Canadian law, and the legal and constitutional obligations that governments in both Canada and the United States have to protect those rights.
- We recognize the legal and constitutional rights possessed by Indigenous peoples in Canada and in the Unites States, and the importance of the relationship between Indigenous peoples and their traditional lands and resources. We commit to working with Indigenous communities in a manner that recognizes and respects those legal and constitutional rights and the traditional lands and resources to which they apply, and we commit to ensuring that our projects and operations are carried out in an environmentally responsible manner.
- Consistent with Enbridge's respect for the rights of Indigenous peoples, we engage early and sincerely through processes that aim to achieve the support and agreement of Indigenous nations and governments for our projects and operations that may occur on their traditional lands.
- We seek the input and knowledge of Indigenous groups to identify and develop appropriate measures to avoid and/or mitigate the impacts of our projects and operations that may occur on their traditional lands.

[1] In Canada, Indigenous peoples has the meaning assigned by the definition *aboriginal peoples of Canada* in subsection 35(2) of the *Constitution Act*, 1982, which includes First Nations, Métis and Inuit Peoples. In the United States, Enbridge refers to Indigenous peoples as all descendants of people inhabiting land within the current exterior boundaries of the United States prior to the continent being inhabited by European settlers, including all U.S. federally recognized tribes.

[2] The collective term "Indigenous groups" is used in this Policy when referring to Enbridge's engagement with Indigenous nations, governments or groups in Canada, and/or Native American Tribes and Tribal associations in the United States about Enbridge's projects and operations. Enbridge has the utmost respect for the unique rights and individual names of Indigenous groups across North America. This collective term is used solely for the purpose of readability of the policy.

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Promoting equity and inclusion

- Recognizing the need to eliminate the significant socioeconomic barriers that continue to prevent Indigenous peoples from fully participating in the North American economy, Enbridge works with Indigenous peoples to ensure they have opportunities to be included in socioeconomic benefits resulting from our projects and operations. These may include partnerships and opportunities in training and education, employment, procurement, equity participation, business development and community development.
- We are committed to increasing Indigenous representation in Enbridge's workforce and supplier community.

Fostering awareness through education

- We are building—and will continue to ensure—a foundational understanding of the rights, history and cultures of Indigenous peoples through Indigenous awareness training for all Enbridge employees, with the aim of advancing reconciliation with Indigenous peoples

Enbridge will provide ongoing leadership and resources to ensure the effective implementation of the above principles, including the development of implementation strategies and specific action plans, and report its Indigenous reconciliation efforts—including engagement and inclusion outcomes—through its annual Sustainability Report.

This Policy is a shared responsibility involving Enbridge and its affiliates, employees and contractors, and we will conduct business in a manner that reflects the above principles. We will work with our contractors, joint venture partners and others to support consistency with this policy. Enbridge commits to periodically reviewing this policy to ensure it remains relevant and meets changing expectations.

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ENBRIDGE GAS INC.

Answer to Interrogatory from
Ginoogaming First Nation (GFN)

Interrogatory

Issue:

1

Reference:

- EB-2024-0067, Consultation Transcript, pages 22-23
- Enbridge Inc.'s Indigenous Reconciliation Action Plan
- Enbridge Inc.'s Indigenous Peoples Policy

Preamble:

At the Stakeholder Conference for EGI's 2024 Annual Update to its 5-Year Gas Supply Plan, EGI stated:

"The gas supply plan update does not have an impact on traditional lands or on Aboriginal and treaty rights, and, therefore, Enbridge Gas has not undertaken a consultation as it would in relation to an application for facilities that may have a potential impact on traditional lands or Aboriginal and treaty rights."

Question(s):

a) Does this remain EGI's position for the purposes of the current proceeding? If it does, please explain its rationale for the position that the GSP does not have an impact on traditional lands or on Aboriginal and treaty rights.

   If it does not remain EGI's position, please explain how EGI's position has changed.

   As part of your answer, please confirm whether EGI denies that EGI's operations in the traditional territories of First Nations have an ongoing impact on the lands and ecosystems, as well as the lives of community members, in those territories.

b) Assuming the above quotation remains EGI's position in this proceeding, please explain how the position is consistent with the principles of reconciliation. As part of your answer, please confirm the understanding (or definition) of reconciliation that EGI is using as the basis for its response.

c) Assuming the above quotation remains EGI's position in this proceeding, please explain how the position is consistent with the following statements:

- From Enbridge Inc.'s IPP, which states that "[c]ompanies can play a role in advancing reconciliation through meaningful engagement with and inclusion of Indigenous peoples and perspectives in their business activities" and that Enbridge will "seek the input and knowledge of Indigenous groups to identify and develop appropriate measures to avoid and/ or mitigate the impacts of [its] projects and operations that may occur on their traditional lands."

- From Enbridge Inc.'s IRAP, which states that "Enbridge understands meaningful engagement and respectful relationships are foundational to advancing reconciliation. [Enbridge is] committed to developing strategies, mechanisms and opportunities that support and nurture dialogue and engagement between Enbridge and Indigenous groups throughout the lifecycle of [its] projects and operations."

d) Does EGI agree that the GSP and subsequent annual updates would benefit from the inclusion of Indigenous consultation and perspectives throughout the process of developing these documents?

   If it does, please elaborate on how EGI believes this should take place.

   If it does not, please explain why not.

e) Does EGI agree that a requirement for EGI to engage with impacted First Nations on significant developments such as the energy transition would help to ensure that the concerns and perspectives of EGI's First Nations customers are identified? If not, please explain why not.

f) Does EGI agree that a requirement for EGI to engage with impacted First Nations on significant developments such as the energy transition would also increase the likelihood that any risks and opportunities are identified early, enabling EGI to take meaningful action when it is most cost-effective to do so? If not, please explain why not.

Response:

a) Enbridge Gas's position remains the same in the current proceeding. The gas supply plan focuses on the movement of the gas molecules using existing facilities. Hence, the gas supply plan does not have any impact on traditional lands or on Aboriginal and treaty rights. If new facilities were required, Enbridge Gas would consult with potentially affected Indigenous groups in relation to the potential adverse impacts such facilities may have on traditional lands or on Aboriginal and treaty rights as part of a Leave to Construct application, if required.

   Enbridge Gas acknowledges that its operations are on the traditional territories of many First Nations who benefit from receiving access to natural gas.

b) Enbridge Gas does not have a singular definition of reconciliation. Reconciliation is about listening and learning from the lived experiences of Indigenous peoples and taking this context and knowledge into account to continue to move forward with mutual respect and understanding. Enbridge Gas's reconciliation journey is laid out in the IRAP and IRAP Refresh, which guides our approach to Indigenous engagement, relationship-building and inclusion. We've worked hard to build and maintain respectful relationships, to maximize economic inclusion, and to meaningfully engage Indigenous groups over the full lifecycle of our facilities.

c) Please see response at Exhibit I.1-GFN-1, part f).

d) Enbridge Gas views the gas supply plan regulatory process as a way for Indigenous groups to participate in and provide feedback and comment on the gas supply plan. That said, should an Indigenous group express an interest in being engaged on the gas supply plan, Enbridge Gas will consider ways to do so on a go-forward basis outside of the regulatory process.

e-f) Enbridge Gas is currently engaging with Indigenous groups and the Indigenous Working Group (IWG) on the topic of energy transition to consider and address, as appropriate, any concerns raised. It is important to recognize that there may be varied perspectives on this issue and engagement doesn't dictate a particular outcome – there must be give and take on all sides and a balancing of societal interests.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ginoogaming First Nation (GFN)

Interrogatory

Issue:

1

Reference:

- GSP, pages 63-72
- Enbridge Inc.'s Indigenous Reconciliation Action Plan
- Enbridge Inc.'s Indigenous Peoples Policy
- Truth and Reconciliation Commission, Calls to Action

Preamble:

The GSP's section on public policy contains no references to First Nations, Indigenous peoples, or reconciliation.

Question(s):

a) What criteria did EGI use to determine the subjects it would address in section 6 of the GSP, "Achieving Public Policy"? Please include any references to OEB guidance, policy or decisions that informed the criteria that EGI employed.

b) How does EGI define reconciliation? Does it understand reconciliation to be the following, as set out on page 2 of the IRAP: "ensuring that our future is increasingly inclusive and respectful of Indigenous rights, values and heritage, and in recognizing their vital role and contributions in shaping a more inclusive society"?

c) Does EGI recognize reconciliation to be, among other things, a public policy goal?

d) What is EGI's rationale for not addressing reconciliation in the GSP, whether in its public policy sections or elsewhere?

e) What is EGI's rationale for not investigating or identifying the concerns, perspectives and/or interests of First Nations and/or its Indigenous customers in the GSP, whether in its public policy sections or elsewhere?

f) Does EGI agree that its approach to the procurement of its gas supply could provide opportunities to advance reconciliation, if designed with the intention to do so?

g) Further to the question immediately above, please provide specific comment as to whether the procurement of EGI's gas supply could have an impact on the following priorities from the IRAP, including any reasons why the GSP could not have a positive impact on these items (if designed with the intention to produce a positive impact):

- Establishing flexible work placements and opportunities for Indigenous people (page 10), and increase Indigenous representation in Enbridge's permanent workforce (page 10);
- Explore and execute Indigenous commercial equity partnerships (page 19);
- Advance opportunities for Indigenous business to participate in Enbridge's supply chain (page 19);
- Advance Indigenous procurement spending (page 20);
- Explore opportunities to remove contracting barriers and support Indigenous contractors (page 20).

h) Further to the question immediately above, please provide specific comment as to whether the procurement of EGI's gas supply (if designed with the intention to do so) could have an impact on the Truth and Reconciliation Commission's Call to Action #92 ("CTA #92"), which reads:

We call upon the corporate sector in Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operational activities involving Indigenous peoples and their lands and resources. This would include, but not be limited to, the following:

i. Commit to meaningful consultation, building respectful relationships, and obtaining the free, prior and informed consent of Indigenous peoples before proceeding with economic development projects.

ii. Ensure that Aboriginal peoples have equitable access to jobs, training, and education opportunities in the corporate sector, and that Aboriginal communities gain long-term sustainable benefits from economic development projects.

i) Does Enbridge Inc.'s "recognition" of CTA #92[1] apply equally to EGI? If it does not, please explain why not. If it does, please explain what "recognition" of CTA #92 means for EGI.

Response:

a) Enbridge Gas follows the guidance set out in the following two OEB decisions and guidance documents when determining the subjects to be included in Section 6 of the 5-Year Gas Supply Plan:

- Section 3.1.4 of the Framework for the Assessment of Distributor Gas Supply Plans[2].
- OEB Staff recommendation outlined in the OEB Staff Report to the Ontario Energy Board on the Review of 2024 Annual Update to Enbridge Gas Inc. Natural Gas Supply Plan[3].

Enbridge Gas determined that enacted or proposed climate or energy policies that may influence customer gas demand or supply type are relevant policies for the purpose of the 5-Year Gas Supply Plan.

b) Please see response at Exhibit I.1-GFN-2, part b).

c) Enbridge Gas recognizes the importance of reconciliation. It is not clear, though, that reconciliation is a "public policy" that directly applies to gas supply plans. With that being said, Enbridge Gas has publicly stated its commitment to building and maintaining positive relationships with Indigenous communities. Enbridge Gas has implemented various initiatives aimed at reconciliation, including partnerships, community engagement, and support for economic development and education programs for Indigenous peoples. The Company acknowledges the importance of reconciliation in its operations and strives to align its policies and practices with this goal.

d) The gas supply plan pertains to the movement of the natural gas commodity. Enbridge Gas does not always explicitly reference reconciliation in its plans, such as the gas supply plan; however, this does not mean that the Company is not guided by its IRAP. Enbridge Gas understands that reconciliation is a process that does not prescribe any particular substantive outcome.

[1] See IRAP at page 1. "Further, [the IRAP] is developed in recognition of the Truth and Reconciliation Commission's Call to Action #92…".
[2] EB-2017-0129, Report of the Ontario Energy Board, October 2018, p.11.
[3] EB-2024-0067, Report of the Ontario Energy Board, January 2025.

e) Enbridge Gas does not seek customer engagement on the development of its gas supply plan from any set of customers which was not limited to First Nations and/or Indigenous customers. Enbridge Gas prepares its gas supply plan ensuring it meets customers' gas supply requirements while complying with the OEB's Guiding Principles.

f-g) Enbridge Gas agrees that the approach to the procurement of gas supply could advance reconciliation. Indigenous suppliers of natural gas can bid into the RFP process provided that the required standards and criteria are met. No change is required to the existing RFP process to facilitate Indigenous participation. To the extent that implementation of IRAP priorities could be addressed through the procurement of natural gas, they could increase Indigenous participation and procurement spend.

h-i) Enbridge agrees that procurement of Enbridge Gas's gas supply (if designed with the intention to do so) could have an impact on CTA#92. Enbridge developed its IRAP in recognition of the CTA's call to Action #92. The commitments within the IRAP, including procurement, talent attraction and recruiting and cultural support programs, will support Enbridge working towards CTA #92. Enbridge's recognition of CTA #92 applies equally to Enbridge Gas.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ginoogaming First Nation (GFN)

Interrogatory

Issue:

1

Reference:

- GSP, page 66
- Ontario's Affordable Energy Future ("OAEF")[1]

Preamble:

The GSP's policy section includes extensive references to the document Ontario's Affordable Energy Future, but it does not include the many references to support for Indigenous people that the document contains.

Question(s):

a) Does EGI agree that the OAEF's statements concerning Indigenous participation in Ontario's energy sector, and in particular the OAEF's section entitled "Indigenous Leadership and Participation", remain a current statement of the Ontario Government's priorities for Indigenous engagement in the sector?

b) Does EGI agree, to the best of its knowledge, that the following policy positions, which are set out in the OAEF,[2] remain the position of the Ontario Government:

   - Early and meaningful engagement and consultation with Indigenous communities on energy planning and major energy projects is critical to building out our energy system;
   - Energy procurements need to incorporate the value of Indigenous leadership and participation by building on existing incentives and engagement requirements;

[1] Ontario's Affordable Energy Future: The Pressing Case for More Power | ontario.ca
[2] Ontario's Affordable Energy Future: The Pressing Case for More Power | ontario.ca , page 22.

- Indigenous representation is critical to ensuring there are Indigenous voices at the table on provincial energy matters.

In the event EGI does not agree, please elaborate on how it understands the Ontario Government's position to have evolved on these issues.

c) Please comment on the extent to which EGI believes its GSP could support the above priorities, if the GSP were designed with the intention to support them.

d) Please explain EGI's position on the extent to which EGI believes the OAEF's statements in support of increased Indigenous participation and leadership in Ontario's energy sector are relevant to the development of a gas supply plan in Ontario.

Response:

a-b) Enbridge Gas takes the statements in the OAEF and its Energy for Generations (or Integrated Energy Plan) at face value, noting that the IEP was issued more recently than the OAEF and it also contains a chapter on Indigenous Leadership and Partnership. Enbridge Gas cannot speak for the Government of Ontario regarding what aspects of the OAEF and the IEP govern in the case of any overlap between the two documents.

c-d) Enbridge Gas interprets the above noted OAEF priorities, specifically related to energy procurement, to be in the context of the Government of Ontario's energy procurement activities and not directed towards Enbridge Gas.

Enbridge Gas will continue to prepare its gas supply plan to meet customers' gas supply requirements while complying with the Guiding Principles outlined in the OEB's Gas Supply Plan Framework (Framework)[3].

[3] EB-2017-0129, Report of the Ontario Energy Board, October 2018.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

1

Reference:

[p.10]

Question(s):

Please provide a copy of any internal guides, protocols, references documents, that set out Enbridge's proposed gas supply (including both commodity and transportation) processes.

Response:

Please see Attachment 1 for Enbridge Gas's Gas Supply Procurement Policies and Practices manual, which prescribes the policies and practices that govern the procurement of natural gas commodity, transportation services and storage services by Enbridge Gas.

Enbridge Gas Inc.

Gas Supply Procurement Policies and Procedures

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July 23, 2021

July 23, 2021

Gas Supply Procurement Policies and Practices

1. Introduction

This manual prescribes the Policies and Practices that govern the procurement of gas supply by Enbridge Gas Inc. (the "Company" or "EGI "). In this context, gas supply includes the physical commodity, transportation and storage services. The definition of gas for the purpose of this Policy includes conventional or fossil-based natural gas by all production methods, as well as Renewable Natural Gas ("RNG") and hydrogen. In addition to these Policies and Practices, all procurement of gas supply is made in accordance with the Affiliate Relationships Code for Gas Utilities and the Record Keeping and the Natural Gas Reporting and Record Keeping Requirements ("RRR") of the OEB.

2. Objectives

EGI has the following four objectives for procuring gas supply for sale or delivery (i.e., load balancing) to its customers:

2.1 Provide Cost-Effective Reliable Supply Through a Diversified Portfolio

This objective is intended to achieve a market sensitive price, through the use of diversified tools to provide a reasonable cost of gas for EGI ratepayers in alignment with public policy. This means minimizing risks to security of supply while finding a balance between the use of contract pricing mechanisms, delivery and contractual terms, and supply basin diversification to achieve this goal.

2.2 Minimize Exposure to Counterparties in All Gas Supply Transactions

This objective is in place to recognize the need for prudent credit practices in gas supply procurement.

2.3 Ensure Fairness to All Counterparties in All Gas Supply Transactions

EGI ensures that all transactions are carried out with integrity with no preferential treatment shown towards any counterparty.

2.4 Operate Within Corporate Governance and Controls

Corporate Governance is an integral part of the Policy. The Gas Supply portfolio has oversight by the VP, Energy Services. All transactions are approved according to Authorized Transactions Limits and have appropriate internal controls in place.

3. Controls

There are five independent controls built into the Policy:

1) Corporate Governance through the VP, Energy Services review of the gas supply plan;
2) Transactions in the procurement plan approved per Authorized Transaction Limits within the Vice President Energy Services group

3) Segregation of the responsibilities between the front office (transactors), middle office (Risk, Contracts and Credit) and the Back office (accounting and administration) functions;
4) Internal audits of the transactions;
5) Exception reporting

3.1 Corporate Governance

VP Energy Services, at least annually, review and approve the Gas Supply Plan. In accordance with Authorized Transaction Limits, the presiding Vice President, has full authority to implement the plan including the purchase of gas incremental to the Gas Supply Plan that may be required. The Gas Supply Plan is used to establish the monthly procurement plan.

3.2 Procurement Plan Approval

The Gas Supply department develops the monthly procurement plan for transactions to be executed.

The presiding Vice President or Director, Gas Supply and the Manager, Gas Supply or their delegate, sign the monthly procurement plan as required per the Authorized Transaction Limits. This approval and the Authorized Transactor List provides all necessary authorizations for the transactors to execute the transactions in the procurement plan.

3.3 Segregation of Duties

Front Office

- Verifies credit limits before deal execution
- Executes trades and contracts in accordance with these Procedures
- Enters transactions into systems of record
- Monitors price exposures and develops strategies to manage identified price risks based on net open position reports
- Reviews transactions for accuracy

Middle Office

Risk Control:
- Monitors transaction capture and associated pricing information
- Distributes Translogs to Front Office where applicable
- Monitors and maintains Authorized Transactor List to daily transactions

Contracts:
- Prepares contractual documentation for physical and financial transactions
- Manages the confirmation process for Physical Commodity Transactions
- Arranges physical contracts with counterparties

Credit:
- Review of counterparties and associated credit requirements
- Establishing credit lines and credit support (if required)
- Monitors and reports on the Credit Risk associated with counterparties

Back Office

Invoicing:
- Verifies Counterparty invoices

Finance:
- Arranges transfer of funds to settle transactions
- Accounting for transactions and financial report distribution

3.4 Internal Audit of Transactions

Periodically, the Internal Audit department ("Audit") initiates and conducts an audit of transactions. The intent of the audit is to ensure the Policy is being followed. In the event that Audit discovers any discrepancies relating to transactions, settlements, etc. that could expose the Company to legal liability, the Director, Gas Supply is notified immediately.

3.5 Exception Reporting

The transactors adhere to the Policy as completely as possible in all circumstances. However, EGI recognizes that exceptions to the Policy may be required in certain market situations and such exceptions are approved per the Manager, Risk Control prior to commitment.

4. Credit

The credit guidelines apply to all gas supply transactions. The intent of the guidelines are to maintain prudent credit practices while balancing with the need to maintain ample alternatives for acquiring gas supplies.

Counterparty assessments are performed in conjunction with any transactions that present a financial risk to EGI if the supply had to be replaced due to counterparty default. Counterparty assessments follow industry best practices and consider information such as public rating agency information, counterparty financial information, and any other quantitative or qualitative information that may be available. If appropriate, unsecured credit limits are established to cover the transaction risk. In cases where a sufficient unsecured credit limit cannot be established, credit support is requested. Counterparty creditworthiness and relative financial risk are monitored on an on-going basis. Any concerns are discussed with Gas Supply and appropriate actions are undertaken to mitigate any associated risk.

5. Means of Procurement

EGI will procure each tranche of gas supply commodity under agreements reached with existing or new suppliers by the following means:

a) a bidding process involving a request for bids for the tranche of gas supply commodity;
b) a straight purchase; or
c) an electronic transaction using an electronic exchange or an electronic trading platform, or both, for which the Company has trading privileges.

EGI may procure a tranche of gas supply commodity by other means, however, for the following reasons:

a) to meet immediate security of supply, reliability of supply, or emergency situations;
b) to develop a business relationship with a particular supplier;
c) to accept a unique, unsolicited supply proposal from a particular supplier;
d) to accept an unsolicited offer for a tranche of gas supply for a period of one through five days when the price is lower than the current market price for the delivery point(s) specified in the offer;
e) to purchase gas from the Company's customers as part of direct purchase arrangements; or
f) to purchase gas produced in the Province of Ontario.

The Company will prepare and file annually, with the Ontario Energy Board's Chief Regulatory Auditor, a report on all transactions to procure gas supply commodity that do not comply with the foregoing. The report will provide the particulars of each such agreement, including the name of the supplier, and an explanation and justification for non-compliance.

5.1 Bidding Process

EGI will send a request for bids on a select tranche of gas supply commodity required by the Company. The following information will be included in each request for bids:

a) the purchaser (i.e., Enbridge Gas Inc.);
b) the delivery point(s) by pipeline;
c) the type of supply (i.e., firm or interruptible);
d) the term;
e) the bid deadline; and,
f) any other particulars.

The transactor will note the date and time of receipt on each bid except when such a notation already appears on the bid; for example, bids sent electronically. The Company, or will record the name of the suppliers or service providers from whom the Company received a bid.

In the event of a Blind RFP for Storage Capacity or Gas Supply Commodity, the Company will engage an RFP Manager and develop a matrix outlining the requirements for the service. The RFP Manager will be responsible for issuing the RFP, collecting the RFP responses and providing them to EGI in blind form.

The Company will evaluate all bids in a fair and consistent manner according to the following criteria:

- the lowest reasonable price having regard not only to the bid price *per se*, but also the specific service attributes, benefits or risks inherent in each bid made in accordance with the terms and conditions specified in the request for bids; and,
- whenever a supplier offers different terms and conditions in its bid, as an alternative to the Company specified terms and conditions, the lowest reasonable price having regard not only to the bid price *per* se, but also the specific service attributes, benefits and risks inherent in the alternative.

The Company will award the tranche of gas supply commodity to the bidder offering the lowest price unless there are offsetting risks in the bid, compared to another bid at a higher price, or offsetting service attributes or benefits in another bid at a higher price. In this event, the Company may award the tranche of gas supply commodity to the bidder offering a higher price.

In the event of a blind RFP, the third party agent will coordinate collection of the bids and ensure that the bidder's name and/or other identifying information is removed from the bid prior to the Company evaluating the bid.

5.2 Straight Purchases

EGI may procure gas supply commodity by means of a straight purchase from a supplier. This may include cases where liquidity, diversity or other market conditions make direct negotiations with a supplier more favorable than a bidding process.

6. Electronic Transactions

EGI may procure a tranche of gas supply commodity by means of transactions on one or more electronic exchange(s) or electronic trading platform(s), or both, for which the Company has trading privileges; for example, Intercontinental Exchange Inc. ("ICE") and Natural Gas Exchange Inc. ("NGX"). Some electronic exchanges and electronic trading platforms operate such that the identity of the prospective supplier is not disclosed until the transaction is complete. The Company will identify in the agreement entered into with an electronic exchange or an electronic trading platform a list of approved counterparties for its gas supply transactions.

Effective July 23, 2021

Jason Gillett

Jason Gillett, Director Gas Supply

Jim Redford, VP Energy Services

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

1

Question(s):

Please detail all gas supply planning process, methodologies, or approach changes since the OEB considered Enbridge's previous 5-Year Gas Supply Plan, that were not subject to explicit approval as part of EB-2022-0200, EB-2024-0111, or EB-2024-0064.

Response:

In addition to items related to gas supply that have been introduced in the three phases of the 2024 Rebasing Application[1], Enbridge Gas has made a number of changes to gas supply planning process, methodologies and approaches since the first 5-Year Gas Supply Plan[2]. These have been introduced and discussed in the Gas Supply Plan Annual Update filings over the past six years (including in the current filing). The changes can be summarized in the following categories:

1. Organizational and Structural Improvements

   Enbridge Gas refined its Gas Supply organizational structure by consolidating procurement responsibilities for gas commodity, storage, and transportation assets under a single team. This change was designed to improve information sharing, decision-making efficiency, and regulatory oversight. Additionally, responsibilities for non-OEB regulatory functions (such as monitoring upstream transportation regulations and managing reporting requirements) were also centralized within the Gas Supply team.

[1] EB-2022-0200/EB-2024-0111/EB-2025-0064.
[2] EB-2019-0137.

2. Blind RFP Process Enhancements

   Responding to concerns from the Ontario Energy Board (OEB) about potential bias in its blind Request for Proposal (RFP) process for storage services, Enbridge Gas undertook a third-party review by ScottMadden Management Consultants. Based on their recommendations, the Company implemented several key improvements:

   - Expanded criteria for selecting external RFP managers, emphasizing natural gas expertise.
   - Clearly defined roles and responsibilities between Enbridge Gas and the RFP manager.
   - Revised RFP documentation to improve clarity and reduce bidder follow-up questions.
   - Extended bidding periods to allow more time for submissions.
   - Empowered the external RFP manager to conduct initial bid evaluations and provide rankings.

3. Integration and Harmonization Efforts

   Following the 2019 amalgamation of Union Gas and Enbridge Gas Distribution, Enbridge Gas harmonized the gas supply function based on the following activities:

   - Aligned planning timelines and deliverables across rate zones.
   - Reduced resource requirements through consolidated input processes and standardized formats.
   - Launched a Gas Supply Plan Harmonization Project to unify methodologies across legacy systems. This project involved reviewing seven key planning categories with input from Finance, Regulatory, Engineering, and Operations departments: weather, customer growth, demand (average and design day), transportation, storage, and supply assumptions. The goal was to develop a single integrated planning model, pending OEB approvals through the 2024 Rebasing proceeding where necessary.

4. IT System Integration

   In support of the amalgamation of the two legacy utilities, one of the key integration requirements impacting Gas Supply was the integration of the IT

systems used for contracting, invoice management, and accounting for gas supply related procurement. Prior to the implementation of the project described below, Enbridge Gas had two distinct processes and systems for these functions for each of the legacy utilities.

In 2019, a project kicked off with the purpose of integrating underlying IT systems that support the gas supply purchasing and accounting functions for Enbridge Gas. This initiative was implemented in February 2022, and included an integrated solution to manage the contracting, invoicing and nominations of gas supply purchases, as well as the financial processes required for credit, risk management, and associated regulatory accounting.

5. Transportation Recommendation Documentation

   Enbridge Gas standardized its documentation of support for contracting decisions, through the use of a contract decision template. The recommendation documents are completed prior to executing new, or extending existing, transportation contracts. Enbridge Gas provided the Transportation Recommendation Documents supporting the recent contracting decisions in Appendix J for the 2025 Annual Update.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

1

Reference:

[p.64]

Question(s):

Please provide Enbridge's views on recent changes in both U.S. policy (including but not limited to trade policy) that may impact security of supply, and what, if any steps, Enbridge has or is considering taking

Response:

Please see response at Exhibit I.2-STAFF-10 and Exhibit I.1-CME-4 for discussion regarding the impacts of U.S. trade policy, security of supply, and related actions taken (or not) by Enbridge Gas.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

4.2 Annual Demand, General Service Market Risk Analysis, pg. 18

Preamble:

Enbridge Gas stated the general service annual demand would be affected by approximately 0.4% higher/lower if the real natural gas price is 10% higher/lower than forecast.

Enbridge Gas stated that the annual demand forecast considers the carbon levy within the forecast natural gas price used in forecasting non-residential average use. Without the carbon levy, the forecast natural gas price would have been 30-40% lower.

Question(s):

a) Please describe whether and how the removal of the federal carbon charge will necessitate any changes to Enbridge Gas's gas supply plan (i.e. adjustments to contract volumes, storage utilization or upstream transportation arrangements).

Response:

a) The removal of the federal carbon charge is not expected to have a material impact on Enbridge Gas's gas supply plan. Based on the above referenced impacts, Enbridge Gas expects the removal of the federal carbon charge to result in an increase in forecasted annual general service consumption/demand of 1.2% to 1.6%[1], which equates to 7 to 10 PJ for the 2024/25 gas year. Enbridge Gas has sufficient flexibility within its portfolio through purchases at Dawn to manage this level of demand increase.

[1] The impact of a decrease in forecast natural gas prices of 30% equates to a demand increase of 1.2% (0.4% x 3). The impact of a decrease in forecast natural gas prices of 40% equates to a demand increase of 1.6% (0.4% x 4).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

4.2 Annual Demand, Annual Demand Forecast, pg. 19

Preamble:

In explaining its annual demand forecast, Enbridge Gas noted that the general service market demand is forecast to decline on average by approximately 0.5%. By contrast, contract market demand is forecast to remain relatively stable, increasing slightly for the EGD and Union South rate zones due to customer growth.

Question(s):

a) Please confirm that the contract market demand forecast takes into account the ongoing trade issues between United States and Canada.

b) Did Enbridge Gas contact its contract customers after the recent announcement of tariffs by the United States to confirm whether the forecasted consumption or demand has changed? If not, does Enbridge Gas intend to contact some of its contract customers that are likely to be significantly impacted by the ongoing tariffs (auto production, steel and aluminum etc.) to confirm their natural gas demand? Please provide a detailed response.

Response:

a) Not confirmed. The contract market demand forecast does not take into account the ongoing trade issues between United States and Canada as the Contract Market demand forecast was developed prior to tariffs being announced.

Enbridge Gas will assess and incorporate any tariff-related impacts on demand as part of its annual demand forecast process, based on the trade policy at the time. These impacts, if any, will be reflected in the forecast used to prepare the gas supply plan and included in the next available Annual Update filing.

b) Enbridge Gas has held discussions with customers from various sectors likely to be affected by tariffs, including steel and automotive. Feedback from these discussions suggest that the implementation of tariffs has introduced uncertainty, making it challenging for customers to evaluate the impact on their operations and natural gas needs. If tariffs continue, Enbridge Gas will maintain regular communication with customers to monitor their natural gas requirements. Currently, Enbridge Gas has not identified any reduction in customer's firm demands.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

4.4 Design Day Demand, Design Day Demand Forecast Changes, pg. 24

Preamble:

Enbridge Gas stated that its design day demand forecast incorporates historical design day use per customer trends for existing general service customers, which reflects observed DSM consumption savings, process or behavioural changes and general service customer growth (including ET adjustments).

Question(s):

a) Please clarify what Enbridge Gas means by “process or behavioural changes”. Please explain how it is measured and observed and how Enbridge Gas incorporates it into the design day demand forecast.

Response:

a) Process or behavioural changes are any changes to customer gas consumption patterns. An example of a process change may include a residential, commercial, or industrial customer changing their gas fired equipment to more efficient equipment. Some examples of behavioural changes are modifications to heating requirements due to changes in building office hours or number of people in occupancy, work from home vs work from office, and set back thermostat usage.

   These changes to gas consumption patterns are observed in gas measured in volumetric flow through city gate stations. These volumetric flows are then used to calculate the design day demand, as detailed in Phase 1 of the 2024 Rebasing Application.[1]

[1] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

5. Portfolio Overview, Scarcity of Existing Pipeline Transportation Capacity, pg. 30

Preamble:

In its evidence, Enbridge Gas referenced the 2023 and 2024 annual updates where it noted that the scarcity of transportation capacity on the TCPL mainline had become a significant consideration when evaluating transportation alternatives. The scarcity of transportation capacity on the TCPL mainline continues to be a concern, and Enbridge Gas has observed that available capacity has become scarce on several other transportation paths as well.

Question(s):

a) Please outline the steps that Enbridge Gas has taken to address the shortage of transportation capacity on the TCPL mainline. Please provide a response under different durations: (1) short-term measures and (2) medium to long-term measures.

Response:

a) In the short to medium term, Enbridge Gas continues to participate in TCPL open seasons (for both existing and new capacity) annually (or when open seasons are released by TCPL) depending upon the nature of the capacity and services offered. As discussed in the 5-Year Gas Supply Plan,[1] Enbridge Gas assesses any TCPL capacity that becomes available relative to its forecasted needs, and has participated in annual open seasons since 2023, including the current ECOS and NCOS.[2] The Company has prioritized transportation contracts (including TCPL) that

[1] EB-2025-0065, pp.30-31.
[2] https://www.tccustomerexpress.com/assets/2025 ECOS Posting.pdf
https://www.tccustomerexpress.com/assets/2025 NCOS Posting.pdf

include renewal rights that can be exercised at its discretion, providing increased contracting flexibility while maintaining portfolio diversity and reliability.[3] In the longer-term, Enbridge Gas regularly communicates its needs to TCPL, seeking solutions including but not limited to commercial alternatives, operational alternatives, or construction of certain new transportation capacity, as appropriate.

Absent additional capacity (in either the short or long-term), depending upon the delivery area affected and the nature and magnitude of respective forecasted demands, the Company assesses remaining alternatives available to it consistent with its Gas Supply Procurement Policies and Practices (which are aligned with the OEB's Guiding Principles), including but not limited to alternative firm supply and transportation paths, incremental delivered supply (peaking) arrangements, and commercial alternatives (e.g., permanent assignment of existing capacity).

As discussed in the Company's 5-Year Gas Supply Plan[4],

> …absent readily available capacity (new or existing), competition for existing transportation capacity typically increases. On pipelines where Firm Transportation (FT) tolls are fixed, shippers compete for capacity by bidding for extended contract terms…Going forward, the scarcity of transportation capacity will impact Enbridge Gas's contracting decisions when transportation contracts come to the end of their term as the Company seeks to ensure that the Plan maintains a portfolio of secure and reliable gas supply.

Accordingly, Enbridge Gas's options to ensure there is adequate capacity for its needs on the TCPL Mainline are somewhat limited to exercising renewal rights on existing contracted capacity, bidding for sufficient contract terms in future TCPL open seasons (ECOS and NCOS) to be successful, supporting relevant new capacity projects, and commercial arrangements with existing TCPL shippers (e.g., permanent assignments of existing capacity).

[3] EB-2025-0065, p.31.
[4] Ibid, p.30.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

5.2 Transportation Portfolio Changes, pp. 36-44
Appendix A, Transportation Market Overview, pg. 9

Preamble:

Enbridge Gas stated that existing transportation capacity to Dawn and Enbridge Gas delivery areas has become increasingly scarce since Enbridge Gas filed its last 5-year Gas Supply Plan. Enbridge Gas stated that it has the potential to constrain its ability to ensure adequate supply deliveries to its system to meet the design demands of customers in the future.

For a number of Enbridge Gas's transportation portfolio changes, Enbridge Gas noted that transportation capacity is fully contracted and if Enbridge Gas were to reduce contract levels, it would be unlikely to be able to recontract in the foreseeable future.

Question(s):

a) Please explain how Enbridge Gas manages and assesses the risk associated with the potential inability to renew transportation contracts on fully contracted transportation pipelines.

b) Please explain how the scarcity of existing transportation capacity affects Enbridge Gas's decisions regarding the length of transportation contracts.

Response:

a) Enbridge Gas assesses market demand for, and the implied risk of, losing access to contracted firm transportation capacity upon contract term expiry by monitoring public information regarding the availability of capacity on each of the upstream pipeline systems within its portfolio.

To manage risk associated with the potential inability to renew contracts, Enbridge Gas strives to contract for firm transportation capacity that includes shipper renewal rights as opposed to interruptible or non-firm services that often do not include renewal rights.

Once a firm transportation service that includes renewal rights is contracted there is virtually no risk that the Company will be unable to renew that contract for transportation capacity going forward. Most (97%) of the Company's transportation capacity includes renewal rights.

b) As discussed in the 5-Year Gas Supply Plan, "On pipelines where Firm Transportation (FT) tolls are fixed (like the TCPL Mainline), shippers compete for capacity by bidding for extended contract terms."[1] Based on the results of TCPL open seasons in 2023, 2024 and 2025, to be awarded capacity to high-demand constrained delivery areas (e.g., Enbridge CDA, Enbridge EDA, Union EDA) the Company needs to bid for longer terms to be successful.

Given the competitive and confidential nature of the TCPL open season process and the scarcity of related transportation capacity, Enbridge Gas cannot be certain of what contract terms are necessary to be awarded capacity. However, by comparing contract reporting made available on TCE's website,[2] the Company can estimate certain contract terms that have been awarded in recent open seasons and by calculating a total bid value based on transportation tolls can determine what term would have been required for an alternate transportation path to match or exceed the value of such bids. The Company considers these estimates, as well as the timing of existing contract expirations, to inform the term of its future bids into TCPL open seasons (where sufficient short-term contract flexibility exists the Company can potentially bid for greater term).

Please also see response at Exhibit I.2-STAFF-5, part a), for additional discussion regarding transportation capacity scarcity.

[1] EB-2025-0065, p.30.
[2] https://www.tccustomerexpress.com/docs/ml_contracts/CDE-Report.xlsx

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

5.2 Transportation Portfolio Changes, Rationale for Vector Renewal, pg. 41

Preamble:

In its evidence, Enbridge Gas has explained that capacity on the Vector pipeline to Dawn provides a competitively priced, reliable and flexible transportation option that offers supply diversity at Chicago as well as access to additional supply along the Vector pipeline route, and also provides an important secondary benefit of maintaining Enbridge Gas's ability to serve the Sarnia Industrial Line. This capacity also provides the additional benefit of providing Enbridge Gas the option to deliver to Michigan storage.

Question(s):

a) Please explain what "the option to deliver to Michigan storage" means. Does it mean delivering to some third party or Enbridge Gas storing its own gas at the Michigan storage facility?

b) Has Enbridge Gas previously stored gas transported on the Vector pipeline in storage facilities at Michigan? If yes, please provide quantities, the number of occasions that gas was moved to Michigan storage in the past three years and the number of days that gas was stored on each occasion.

c) What has Enbridge Gas usually done with the natural gas that was stored in Michigan? Has it been sold to third parties in Michigan or moved to Ontario for distribution or storage at Dawn?

d) Why would Enbridge Gas store gas in Michigan as opposed to moving it to Dawn?

Response:

a) Enbridge Gas was referring to the option to contract for underground storage services in Michigan to store gas in inventory.

b-c) As part of the Company's gas supply storage portfolio, Enbridge Gas has not stored natural gas volumes transported on the Vector pipeline in Michigan storage facilities in the past three years. From 2013 to 2018, the Company held a firm storage service contract with Bluewater Gas Storage with a delivery and receipt point at Dawn.[1]

d) Enbridge Gas's preference is to transport natural gas supply volumes to Dawn for storage.

When combined with sufficient associated firm transportation capacity to Dawn, underground storage services in Michigan could supplement or replace similar services currently contracted at Dawn. Enbridge Gas will continue to monitor and consider Michigan storage services for future opportunities.

[1] Agreement term from April 1, 2013, until March 31, 2018, with a Maximum Storage Balance of 3,000,000 Dth.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

5.5 Commodity Portfolio, Table 10, pg. 50

Preamble:

Enbridge Gas provided its annual demand sources of supply at Table 10 for each rate zone over the forecast period 2024/25 to 2029/30.

Question(s):

a) What factors contribute to the declining supply from Dawn and WCSB observed over the forecast period, particularly in the EGD and Union South rate zones?

Response:

While completing this response, Enbridge Gas discovered an error in the 5-Year Gas Supply Plan, Table 10, which has been corrected. An updated version of Table 10 will be filed under separate cover. There are no other aspects of the Company's pre-filed evidence impacted by this error and its subsequent correction. Any interrogatory responses related to Table 10 have been answered using the correct figures.

In the updated 5-Year Gas Supply Plan, Table 10, EGD and Union rate zone annual WCSB supply (lines 6 and 18, respectively) is consistent over the forecast period, with the exception of the 2027/28 year, which increases due to the additional day February 29, 2028 (leap year).

Variations in EGD and Union South rate zone annual Dawn supply (lines 4 and 16, respectively) is attributable to corresponding variations in annual demand over the

forecast period. Enbridge Gas's gas supply plan expects to use upstream pipeline capacity to its fullest, with changes in annual supply needs impacting the volume of supply purchased at Dawn.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

5.6 Design Day Supply/Service Option Analysis, pp. 52-54
EB-2024-0067, 2024 Annual Update, 5.1 Design Day Analysis, pp. 50-52

Preamble:

OEB staff has reproduced below the supply/service option evaluation matrix for the Enbridge CDA and Enbridge EDA filed in Enbridge Gas's current five-year GSP vs. Enbridge Gas's 2024 annual update.

Enbridge CDA
5 Year GSP:

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟡	🟡	🟢	121.74	~3%	No (1)
Short-haul: D-P	🟢	🟡	🟡	38.79	<1%	No
Short-haul: Dawn	🟢	🟡	🟡	23.46	<1%	No
Short-haul: Niagara	🟡	🟡	🟡	28.30	<1%	No (2)
Third-Party	🔴	🔴	🟢	29.05	<1%	Unknown

2024 Annual Update:

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	🟢	🟡	🟢	32.22	<1%	No
Short-haul: D-P	🟢	🟡	🟡	9.35	<1%	No
Short-haul: Dawn	🟢	🟡	🟡	5.38	<1%	No
Short-haul: Niagara	🟡	🟡	🟡	6.59	<1%	No
Third Party	🟡	🔴	🟢	4.44	<1%	Unknown

Enbridge EDA
5 Year GSP:

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul				7.97	<1%	No
Short-haul: D-P				4.05	<1%	No
Short-haul: Niagara				3.75	<1%	No
Short-haul: Iroquois				2.70	<1%	No
Third-Party				2.02	<1%	Unknown

2024 Annual Update:

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul				12.99	<1%	No
Short-haul: D-P				6.22	<1%	No
Short-haul: Niagara				5.72	<1%	No
Short-haul: Iroquois				3.25	<1%	No
Third-Party				1.75	<1%	Unknown

Question(s):

a) For the Enbridge CDA, please explain the significant increase in costs for each option from Enbridge Gas's 2024 annual update.

b) For the Enbridge CDA, please explain why the reliability of the long-haul option has decreased from Enbridge Gas's 2024 annual update.

c) For the Enbridge EDA, please explain why the flexibility of the long-haul options has increased from Enbridge Gas's 2024 annual update.

d) Please describe any key changes to Enbridge Gas's supply/service options since the filing of its last five-year GSP with the OEB.

Response:

a) Enbridge Gas's Design Day Supply/Service Option Analysis calculates annual cost impacts based upon contracting for sufficient capacity/services for five years to resolve the full design day shortfall for each delivery area during the five-year forecast period.[1] As provided in Table 1, forecasted Enbridge CDA shortfall volumes within the 5-Year Gas Supply Plan have increased significantly compared to those filed as part of Enbridge Gas's 2024 Annual Update. As discussed in Section 5.2,

[1] EB-2025-0065, pp.50-51.

the increase in forecasted Enbridge CDA demand is a result of both demand growth and a change in the methodology to derive design day demands.[2] The increased costs observed is attributable to the increased shortfall forecasted.

Table 1
Enbridge CDA Supply Shortfall

Line No.	Particulars (TJ/d)	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
		(a)	(b)	(c)	(d)	(e)	(f)
1	EB-2025-0065 5-Year Gas Supply Plan		(252.9)	(281.0)	(309.1)	(310.9)	(309.5)
2	EB-2024-0067 2024 Annual Update	(63.3)	(54.8)	(65.8)	(77.0)	(87.9)	

b) The reliability of the long-haul option for the Enbridge CDA has declined in the current 5-Year Gas Supply Plan Design Day Supply/Service Option Analysis compared to Enbridge Gas's 2024 Annual Update due primarily to the increased Enbridge CDA shortfall forecasted, as discussed in part a) of this response. More specifically, accommodating an additional 200 TJ/d of demand in this delivery area via long-haul would significantly heighten the Company's need for diversions in the summer months to fill storage and maximize the utilization of contracted capacity. As long-haul diversions are not a firm service and are increasingly being curtailed, the overall reliability of this option is reduced.

c) The flexibility of the long-haul option for the Enbridge EDA has increased in the current 5-Year Gas Supply Plan Design Day Supply/Service Option Analysis compared to Enbridge Gas's 2024 Annual Update as Enbridge Gas adjusted this assessment to be more consistent with its assessment of the Union EDA which is located within close geographic proximity with similar access to upstream transportation and third-party options. By contrast, the diversity rankings for each delivery area remain distinct, as 44% of demand in the Enbridge EDA is already met through TCPL long-haul service compared to 4% in the Union EDA.

d) Since its last 5-Year Gas Supply Plan,[3] very few changes to available upstream natural gas pipeline infrastructure warranting consideration within the supply/service option analysis have occurred. Accordingly, Enbridge Gas has made limited adjustments to the supply and service options considered to be available to certain delivery areas, including for:

[2] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3.
[3] EB-2019-0137, Enbridge Gas Inc. 5-Year Gas Supply Plan.

- Dawn Vector to Courtright backhaul service, contracted with Vector Pipelines effective November 1, 2024;[4] and
- Third-Party Supply option paired with TransCanada capacity assignment for the Enbridge CDA, effective December 1, 2024.[5]

As discussed in Enbridge Gas's 5-Year Gas Supply Plan,[6]

> In both its 2023 and 2024 Annual Updates, Enbridge Gas noted that the scarcity of transportation capacity on the TCPL Mainline had become a significant consideration when evaluating transportation alternatives. The scarcity of transportation capacity on the TCPL mainline continues to be a concern, and Enbridge Gas has observed that available capacity has become scarce on several other transportation paths the Company actively contracts.

Accordingly, many of the options listed in the Supply/Service Option Analysis tables referenced are now fully subscribed and no longer readily available despite otherwise being viable options (i.e., should capacity/services become available). For further discussion regarding transportation capacity scarcity and the remaining options available to Enbridge Gas, please see response at Exhibit I.2-STAFF-5.

[4] EB-2024-0067, Enbridge Gas Inc. 2024 Annual Update, p.33.
[5] EB-2025-0065, p.35.
[6] Ibid, p.30.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

6.1 Global Policy Developments, United States Trade Policy, pg. 64

Preamble:

Enbridge Gas stated that Canadian origin natural gas imports into the U.S. from Canada fall within the USMCA exemption and are not subject to tariffs.
Enbridge Gas's gas supply plan uses U.S. located pipelines to transport and import gas originating in the U.S. to Canada. Enbridge Gas stated that should Canada impose retaliatory tariffs on U.S. origin natural gas imports, the costs of the plan could be impacted by the imposition of Canadian tariffs.
Enbridge Gas further stated that should the plan be impacted by tariffs in the future, it would record the incremental cost in the respective purchase gas variance account and seek recovery of the costs through future QRAMs.

Question(s):

a) What volume of gas currently transported through U.S. pipelines under Enbridge Gas's gas supply plan would be subject to any Canadian imposed tariffs? Please also identify it as percentage of total supply.

b) Please describe any alternative supply routes that Enbridge Gas has considered to mitigate any potential tariff-related cost increases.

c) Please describe further how Enbridge Gas would record and recover the incremental costs associated with tariffs through the purchase gas variance accounts.

d) What criteria will Enbridge Gas use to determine whether tariff-related cost impacts warrant an adjustment to the execution of the gas supply plan?

Response:

a) Of the 531,283 TJ of 2024/25 annual supplies, approximately 289,719 TJ/d could be subject to any Canadian imposed tariffs (approximately 55%).[1]

b) As discussed at length in the Company's 5-Year Gas Supply Plan, transportation capacity has become scarce on several transportation paths that the Company actively contracts including the TCPL Mainline, and GLGT.[2] Enbridge Gas's understanding is that transportation capacity is also scarce on viable alternative paths delivering Canadian produced natural gas supply into the U.S. that could be re-delivered into Canada (i.e., the Alliance Pipeline[3], and the Northern Border Pipeline[4]).[5] Therefore, absent readily available capacity (new or existing) there are no alternative transportation paths.

   Please also see response at Exhibit I.2-STAFF-5, part a), for explanation of the steps that Enbridge Gas has taken to address the shortage of transportation capacity on the TCPL Mainline and available alternatives to that capacity.

c) Incremental gas supply costs associated with tariffs would be included in calculation of actual gas supply commodity costs. Variances between actual gas supply commodity costs and forecasted gas supply commodity costs would be recorded in the existing Purchase Gas Variance Account of each rate zone and recovered through the gas cost adjustment (Rider C).

d) Incremental cost impacts to ratepayers will be the principal criterion used to determine whether adjustments to the execution of the gas supply plan are warranted going forward. Notwithstanding this criterion, as discussed in the response to part b) above, Enbridge Gas has limited alternatives available to it to avoid the impacts of tariffs (U.S. or Canadian).

   Importantly, tariffs have not applied to material volumes procured or shipped by Enbridge Gas to date. Until such time that U.S. tariffs on Canadian sourced natural gas volumes apply to volumes transiting the U.S. for re-delivery into Canada or Canada formally proposes and moves to implement tariffs on U.S. sourced natural gas volumes, it is not necessary to adjust the execution of the gas supply plan.

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[1] Exhibit I.1-CCC-12, part a).
[2] EB-2025-0065, pp.30-31 & Appendix A.
[3] https://www.pembina.com/operations/pipelines/alliance-pipeline
[4] https://www.tcenergy.com/operations/natural-gas/northern-border-pipeline/
[5] Please see response at Exhibit I.2-STAFF-9, part d), for further discussion regarding the availability (or not) of alternative supply/service options.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

6.1 Global Policy Developments, Ontario, pg. 66
Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7)

Preamble:

In June 2025, the Ontario government released its Integrated Energy Plan – "Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7".

Question(s):

a) How does Enbridge Gas intend to incorporate the objectives, priorities, and direction outlined in the Integrated Energy Plan into its current and future gas supply planning.

b) Please discuss whether the Integrated Energy Plan has any implications to the assumptions, supply/service options or contracting strategies in Enbridge Gas's five-year GSP. Please explain how Enbridge Gas plans to address these implications.

Response:

a) The Integrated Energy Plan (IEP) is a new policy document issued by the Government of Ontario more than a month after Enbridge Gas filed the current 5-Year Gas Supply Plan on May 1, 2025. Accordingly, Enbridge Gas is currently working to understand impacts to the Company, as well as any broader implications across the province.

   Enbridge Gas presumes that in response to the IEP the OEB may communicate any actions it intends to take as a result, such as to establish new rules and directives for natural gas utilities, market participants and energy service providers in the province or to initiate related working groups, committees, or proceedings.

Given the timing of the IEP's release, and that no related OEB communications have been received by natural gas utilities to date, Enbridge Gas does not have a definitive plan to incorporate the objectives, priorities, and direction outlined in the IEP into its future gas supply planning at this time. However, as the government's and the OEB's priorities and directions in relation to the IEP become clearer, the Company will incorporate them into future gas supply plans filed as part of its Annual Updates.

b) As noted in response at part a), Enbridge Gas is currently working to understand the implications and directions arising from the IEP that are not yet established. However, Enbridge Gas anticipates that IEP-related impacts to the Company's demand forecast may impact the annual gas supply plan (including but not limited to supply/service options and contracting), depending on their nature and magnitude. As stated in the 5-Year Gas Supply Plan[1]:

> The development of the comprehensive 5-Year GSP begins with the determination of annual and design day demand forecasts (as described in Section 4) that reflect external factors such as industrialization, energy transition, and weather fluctuations. Following the completion of the demand forecasts, Enbridge Gas identifies any Plan shortfalls based on its current portfolio of transportation and storage assets by delivery area, Enbridge Gas next evaluates and adjusts its transportation, storage, and commodity portfolio to ensure sufficient natural gas is available in each delivery area to meet the annual and design day demand forecasts.

As the government's and the OEB's priorities and directions in relation to the IEP become clearer, the Company will incorporate them into future gas supply plans filed as part of its Annual Updates, including impacts to supply/service options and contracting strategies.

[1] EB-2025-0065, p.4.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

6.2 Gas Supply Impacts on Avoided Facilities, pp. 66-68
2.1 Introduction, pp. 5-6

Preamble:

Enbridge Gas provided examples of Enbridge Gas transmission system infrastructure that has been avoided or reduced (i.e. in terms of scope) as a result of gas supply contracting.

Question(s):

a) Does Enbridge Gas incorporate consideration of potential facility benefits of this nature when making its gas supply decisions, or are these incremental impacts that Enbridge Gas would consider to be outside of its gas supply planning principles and practices regarding cost-effectiveness and reliability and security of supply? If the former, please describe how these benefits are taken into consideration.

Response:

a) Enbridge Gas's annual gas supply planning process inherently recognizes the benefits of avoided or reduced facilities in that it seeks to leverage available third-party alternative options to address capacity shortfalls identified, maximizing utilization of existing Company-owned facilities.

   Generally, when in-franchise customer demand growth is forecasted to result in capacity shortfalls relative to the current portfolio of transportation assets, the Company first evaluates and seeks to adjust its gas supply portfolio (e.g., by procuring additional available transportation capacity). If insufficient additional firm transportation capacity is readily available then the Company assesses remaining alternatives available to it, including but not limited to incremental delivered supply

(peaking) arrangements, and commercial alternatives. Consistent with the Company's gas supply planning principles and practices,[1] certain transportation assets are specifically maintained or added to diversify the gas supply portfolio, mitigating risk associated with supply interruption and price volatility and ensuring reliability and security of supply (e.g., PEPL and Vector capacity). Enbridge Gas recognizes certain transportation assets have historically been maintained within the Company's portfolio to also address operational constraints on Enbridge Gas's system(s) (e.g., Vector backhaul capacity in relation to the Sarnia market). To be clear, all of these steps occur(red) as part of the gas supply planning process and are guided by the Company's gas supply planning principles and practices.

If the gas supply planning process determines that there is forecast demand for which there are no viable gas supply alternatives (including commercial/third-party options), then the Company may take steps to commence development of a facility project, including consideration of a baseline facility project within the Company's Asset Management Plan (AMP), and related Integrated Resource Planning (IRP) assessment(s). As part of that subsequent process, the Company may evaluate additional supply-side alternatives, including but not limited to those previously considered for gas supply planning purposes, to reduce or avoid the need for such facilities but would do so distinctly as part of the IRP process (as IRP alternatives). Where novel operational constraints are forecasted to result in capacity shortfalls the Company now addresses them through the evaluation of both facility and non-facility (IRP) alternatives, not as part of the gas supply planning process. Development of baseline facility projects, asset management planning, and integrated resource planning are each distinct and significant processes managed by different departments in co-ordination across the organization that occur after the gas supply planning process.

[1] As discussed in the 5-Year Gas Supply Plan at pp.5-6 and Section 5.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

6.2 Gas Supply Impacts on Avoided Facilities, pg. 67

Preamble:

Enbridge Gas noted that it files an updated Asset Management Plan with the OEB, where it outlines all forecasted capital projects/expenditures, including future transmission system expansion projects.

Question(s):

a) Does the most recent version of Enbridge Gas's Asset Management Plan include any future transmission system expansion projects? If so, does Enbridge Gas expect that its approach to gas transportation arrangements and gas contracting described in this gas supply plan will have any impact (positive or negative) on the likely need for these expansion projects, and the future potential for supply-side alternatives to address these needs? Please describe as needed.

Response:

a) Yes, the 2025 to 2034 Asset Management Plan (AMP)[1] includes future transmission system projects.

   Gas supply transportation contracting will impact the timing of transmission projects because incremental firm deliveries to the Enbridge CDA will defer Dawn Parkway System project in-franchise requirements from what they would be absent the contracting. The upcoming AMP filing for the 2026 Addendum, scheduled to be filed in the fall of 2025, will reflect the impacts to these investments as a result of the forecasted contracts outlined in this gas supply plan. Please see response at

[1] EB-2020-0091.

Exhibit I.2-STAFF-12, for a description of how the Company's gas supply planning process inherently reduces or avoids (transportation) facilities and supports subsequent coordinated planning processes, positively impacting the need for facilities projects.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

6.3 Lower Carbon Energy in the Gas Supply Portfolio, Certified Natural Gas, pg. 71

Preamble:

Enbridge Gas stated that it procures certified natural gas as part of the gas supply commodity portfolio, however, does not pay a premium to include certified natural gas in the gas supply and currently does not have a strategy to actively increase procurement of certified gas.

Question(s):

Please explain why Enbridge Gas does not currently have a plan to increase procurement of certified gas.

Response:

Enbridge Gas continues to procure certified natural gas volumes in instances where those volumes are the most economic option available. However, Enbridge Gas has not focused its efforts on developing a strategy to actively increase the procurement of certified natural gas as stakeholders have not previously indicated common support for Enbridge Gas to pay a premium for certified natural gas volumes, and there is uncertainty related to Enbridge Gas's ability to consistently secure certified natural gas supplies absent a cost premium. Additionally, topic areas covered by certification programs differ between programs as does supplier performance as discussed in response at Exhibit I.2-ED-10, part b), which creates difficulty in establishing relevant performance metrics and procurement targets.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

8 Gas Supply Plan Execution, pg. 78
8.1 Procurement Process and Policy, pg. 79

Preamble:

Enbridge Gas stated that to enable such flexibility to adjust from the supply procurement strategy quickly, Enbridge Gas reserves a portion of the gas supply identified in the gas supply plan for short-term (e.g., prompt month) contracts whereas the remaining portion is contracted prior to the season via a variety of annual, and seasonal contracts. Enbridge Gas also stated that the gas supply for all rate zones is purchased using both fixed and indexed price contracts.

Question(s):

a) What proportion of the total gas supply portfolio does Enbridge Gas reserve for short-term contracts vs. contracted via annual and seasonal contracts?

b) Please describe the criteria and methodology Enbridge Gas uses to determine the appropriate portion of gas reserved for short-term contracts vs. that contracted via annual and seasonal contracts.

c) What proportion of the total gas supply portfolio does Enbridge Gas procure under fixed price contracts vs. indexed price contracts?

d) Please describe the criteria and methodology Enbridge Gas uses to determine the appropriate portion of gas procured under fixed price contracts vs. indexed price contracts.

Response:

a-b) Enbridge Gas's gas supply portfolio is structured to include:[1]

- Annual purchases, to secure base load quantities and ensure supply security;
- Seasonal purchases, to meet winter demand and provide seasonal reliability; and
- Monthly/short-term contracts to reflect market pricing throughout the year, provide flexibility in responding to market variability, weather fluctuations (demand variability), and operational constraints.

Please see Table 1 for a breakdown of the November 2023/24 gas year gas supply portfolio by contract term. The proportions set out in Table 1 reflect actual gas supply purchases, not actual volumes delivered (which may differ depending upon operational constraints and variable supplies nominated daily).

Table 1

2023/24 Gas Year Gas Supply Portfolio by Contract Term

Line No.	Term	Percentage of Portfolio
	(a)	(b)
1	Annual	31%
2	Seasonal	47%
3	Monthly/Short-Term	22%
4	Total	100%

Enbridge Gas reviews its contract term strategy for all supply points annually, following the completion of the Company's annual gas supply plan and ahead of the commencement of each gas year. This review seeks to maintain a well-balanced and diversified portfolio of annual, seasonal, and monthly/short-term purchases to ensure supply reliability, to manage exposure to market variability, and to preserve operational flexibility. Several key factors influence the selection of contract terms at each supply point:

- Market Liquidity: Supply points with low liquidity (i.e., number of counterparties, total volumes traded daily, number and type of daily transactions/trades, price transparency) may warrant entering into longer-term purchase contracts to ensure supply security and to mitigate

[1] All categories within Enbridge Gas's gas supply portfolio can contribute to storage injections, depending upon their specific timing, customer demands, and operating conditions.

procurement risk. Supply points with high liquidity enable Enbridge Gas to enter into shorter-term purchase contracts to ensure fair market value of gas supply and to provide increased operational flexibility.

- Market Variability: Supply points experiencing (current or historic) price or volume variability may warrant entering into a greater number of shorter-term purchase contracts to ensure fair market value of gas supply.

- Operational Flexibility: Maintaining a healthy proportion of shorter-term contracts at all supply points enables Enbridge Gas to adapt to dynamic market conditions, weather fluctuations, operational constraints, variation to forecast or market price variability. Accordingly, Enbridge Gas's contract term strategy is actively monitored and revisited monthly (at a minimum).

c-d) Enbridge Gas's gas supply portfolio is structured to include:

- Indexed priced gas supply purchases, to reduce exposure to market variability while achieving a fair market value of gas supply volumes procured; and
- Fixed priced gas supply purchases, to lock-in the price for certain gas supply volumes procured (often monthly/short-term purchase contracts).

Please see Table 2 for a breakdown of the November 2023/24 gas year gas supply portfolio by pricing mechanism (indexed vs. fixed purchases). The proportions set out in Table 2 reflect actual gas supply purchases, not actual volumes delivered (which may differ depending upon operational constraints and variable supplies nominated daily).

Table 2

2023/24 Gas Year Gas Supply Portfolio by Pricing Mechanism

Line No.	Pricing	Percentage of Portfolio
	(a)	(b)
1	Indexed	98%
2	Fixed	2%
3	Total	100%

The proportions set out in Table 2 change throughout the gas year as the Company's gas supply purchase strategy is actively monitored and revisited monthly (at a minimum).

Enbridge Gas actively mitigates price risk by procuring gas supply at different times throughout the year, at all accessible supply hubs, from a wide-variety of suppliers, using both indexed and fixed pricing mechanisms, resulting in a diverse and layered gas supply portfolio that is reflective of the overall market-value of natural gas. Enbridge Gas's gas supply portfolio only seeks to achieve the procurement of a fair market value for gas supply costs. Enbridge Gas does not speculate or take unnecessary risk in the pursuit of achieving lower than market value cost for supply.

Accordingly, Enbridge Gas's preference is to use indexed priced contracts for most gas supply purchases as they more closely reflect current market conditions and avoid the risk of locking in (or fixing) prices for natural gas deliveries in the future that may end up being higher than market rates at that future delivery date. Under some circumstances, Enbridge Gas uses fixed price contracts, such as during high demand periods when there is high market variability, or when transacting past the NYMEX settlement date in a particular month, to ensure firm supply and price certainty.

Currently, the North American natural gas market is projected to remain well supplied with commodity and be relatively stable. Therefore, there is currently limited benefit to making an increased proportion of fixed priced purchases. The fixed price purchases noted in Table 2 were entered into due to their timing, having transacted near or past the NYMEX settlement date in a particular month and the supply being needed for load balancing purposes during the winter season.[2]

[2] Once the price of NYMEX is determined for the upcoming month, suppliers can give a fixed price that encompasses NYMEX, a locational basis (e.g., Dawn), and the supplier's position into one number.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

11 Performance Measurement, pg. 85
Appendix E: 2023/2024 Performance Metrics

Preamble:

In response to the OEB staff recommendations regarding Enbridge Gas's 2024 annual update, Enbridge Gas has attributed a target or variance range to certain performance metrics.

"Reference Price" and "Instances when QRAM expected bill impacts exceed +/-25%" were not attributed a target or variance range.

Question(s):

a) Please provide further details on how Enbridge Gas determined the single-value targets and variance ranges assigned to the performance metrics. Please include any documents to support the calculations.

b) Please explain whether there are any consequences if Enbridge Gas fails to meet a performance metric.

c) Please explain further why Enbridge Gas does not consider it appropriate to attribute a target or variance range to the "Instances when QRAM expected bill impacts exceed +/-25%".

Response:

a) Enbridge Gas attributed single-value targets for performance metrics where the outcome of the gas supply plan is expected to achieve a single value goal. Enbridge Gas has established three single-value targets for performance metrics: "C", which

stands for compliant, assigned to performance metrics where the gas supply plan is expected to be compliant with the performance metric; “100%”, assigned to performance metrics where the gas supply plan is expected to achieve a 100% outcome; and “0”, assigned to performance metrics where the gas supply plan is expected to have zero instances of the performance metric. Where a performance metric has a single value goal and the actual results are different than the target, Enbridge Gas will provide an explanation on the factors contributing to the gas supply plan not achieving the goal.

Enbridge Gas attributed a variance range for performance metrics where the outcome of the gas supply plan is expected to fall within a statistically significant range of values based on historical performance. Where a performance metric has a variance range and the actual results are different than the variance range, Enbridge Gas will provide an explanation on the factors contributing to the gas supply plan outcomes falling outside of the range.

To determine the variance range, Enbridge Gas used five years of historical results to determine two standard deviations. The two standard deviations were applied to the five-year average to establish the variance range. Expressed as a formula:

Low End of Variance Range = 5-Year Average - 2 Standard Deviation
High End of Variance Range = 5-Year Average + 2 Standard Deviation

In the instance where it is not possible for the gas supply plan to deliver the calculated low end of variance range, the low end of variance range is set as 0 or 0%. In the instance where it is not possible for the gas supply plan to deliver the calculated high end of variance range, the high end of variance range is set at 100%.

Enbridge Gas will add additional years of historical data to the variance range calculation in future years as additional years of performance metric results are available.

Please see Attachment 1, for the variance target supporting calculations.

b) No, there are no consequences if Enbridge Gas fails to meet a performance metric target or if the result falls outside of the variance range.

c) Enbridge Gas has not attributed a target or variance range to the performance metric “Instances when QRAM expected bill impacts exceed +/-25%” because the bill impact of the QRAM process is largely driven by the market price for natural gas, which Enbridge Gas has no influence or input into.

2023/24 Performance Metrics Variance Range Supporting Calculations

Line No.	Measure	Historical Results					5-Year Historical Average	Two Standard Deviations (1)	Variance Range	
		2018/19	2019/20	2020/21	2021/22	2022/23			Low End	High End
		(a)	(b)	(c)	(d)	(e)	(f) = avg (a:e)	(g)	(h) = (f) - (g)	(i) = (f) + (g)
	Weather Variance									
1	HDD Variance - EGD CDA	6%	1%	(10%)	(1%)	(8%)	(2%)	13%	(16%)	11%
2	HDD Variance - EGD EDA	9%	2%	(10%)	2%	(9%)	(1%)	16%	(17%)	15%
3	HDD Variance - EGD Niagara	6%	0%	(10%)	0%	(8%)	(2%)	13%	(15%)	11%
4	HDD Variance - Union North	6%	2%	(10%)	1%	(7%)	(2%)	13%	(15%)	12%
5	HDD Variance - Union South	3%	(1%)	(10%)	0%	(8%)	(3%)	11%	(14%)	8%
	Price Effectiveness									
	Distribution of procurement supply terms:									
6	Less than one month	14%	3%	2%	5%	1%	5%	10%	0%	15%
7	Monthly	28%	27%	24%	18%	25%	24%	8%	17%	32%
8	Seasonal	25%	36%	37%	59%	41%	40%	25%	15%	64%
9	Annual or longer	32%	34%	37%	18%	33%	31%	15%	16%	46%
	Storage									
10	Percentage of actual storage target at November 1 compared to the plan	98%	98%	96%	100%	96%	98%	3%	94%	100%
	Diversity									
	Supply basin diversity									
11	Ontario/Dawn	36%	33%	29%	26%	25%	30%	9%	20%	39%
12	WCSB	19%	23%	25%	21%	26%	23%	6%	17%	29%
13	Appalachia	18%	15%	17%	20%	19%	18%	4%	14%	22%
14	Niagara Region	14%	16%	16%	18%	16%	16%	3%	13%	19%
15	Chicago	10%	9%	9%	10%	11%	10%	2%	8%	11%
16	U.S. Mid-Continent	2%	4%	4%	3%	4%	3%	2%	2%	5%
	Percentage of contracts with remaining terms of:									
17	1-5 years	23%	15%	43%	56%	43%	36%	33%	3%	69%
18	6-10 years	33%	44%	32%	33%	52%	39%	18%	21%	57%
19	> 10 years	44%	40%	25%	12%	5%	25%	34%	0%	59%
20	Total number of unique counterparties	56	58	56	55	55	56	2	54	58
21	Total number of firm receipt points	27	29	22	25	25	26	5	20	31
	Reliability									
22	Number of days of force majeure on upstream pipelines that reduced capacity	0	0	0	14	15	6	16	0	22
23	Number of days of failed delivery of supply (including force majeure)	61	74	82	113	161	98	80	18	178

Note:

(1) Calculated as two standard deviations of the five-years of historical results (columns (a) to (e)).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

2

Reference:

11 Performance Measurement, 2023/24 Performance Metrics Results, pg. 86
Appendix E: 2023/2024 Performance Metrics

Preamble:

The 2023/24 performance metric “Reliability” result for “Number of days of failed delivery of supply (including force majeure)” of 237 days fell above the calculated variance range of 18 – 178 days.

Question(s):

a) Please describe the primary causes that contributed to the elevated number of failed delivery days and how Enbridge Gas responded to the instances of failed delivery.

b) Please describe the changes and improvements Enbridge Gas is considering to reduce the number of failed delivery days in future planning years.

Response:

a) Pipeline maintenance impacting firm delivered supply was the primary cause of the number of failed delivery days reported. Most instances of failed supply delivery were only partial reductions, and on those days Enbridge Gas still received some volumes of gas supply. The impact of all failures during the 2023/24 gas year totaled approximately 4 PJ, which represents less than 1% of total annual gas supply. Pipeline maintenance related events of this nature are standard industry practice across North America and are key to proactive pipeline maintenance for ensuring the safe, reliable, and efficient delivery of natural gas.

Most instances of failed supply delivery reported occurred on the GLGT and NEXUS Pipeline systems:[1]

- Scheduled maintenance and integrity work on GLGT (Emerson Eastbound system) throughout 2024 (both summer and winter seasons) was the greatest contributor to the reported number of failed delivery days (168 days for a total of 1 PJ). GLGT maintenance is scheduled to continue into the winter of 2025/26.[2]
- Scheduled maintenance on NEXUS Pipeline mostly during the summer of 2024 was also a significant contributor to the reported number of failed delivery days (74 days for a total of 3 PJ). NEXUS maintenance is ongoing through the summer of 2025.[3]

As these pipelines are currently fully contracted, there is minimal unutilized capacity available to absorb the impacts of scheduled maintenance events. In all instances of failed deliveries, Enbridge Gas responded by reducing supply deliveries on the affected pipeline and increased storage withdrawals and/or procured additional replacement supply volumes at Dawn to compensate as necessary.

b) Pipeline shippers like Enbridge Gas typically have limited recourse in relation to the instances of failed delivery referenced. Failed deliveries on upstream pipeline systems are typically out of Enbridge Gas's control and often relate to required maintenance or force majeure events. Further, as discussed in response at Exhibit I.2-STAFF-6, upstream transportation capacity is increasingly scarce and there are limited economic alternatives available. However, as discussed in part a), firm storage capacity at Dawn and ready access to alternative supplies at the Dawn Hub enables the Company to adjust to supply shortfalls resulting from such events. Further, Enbridge Gas's diverse portfolio of transportation services (in terms of transportation path and contract term) reduces risk exposure to long-term variation in demand/supply, and short-term supply constraints and/or price spikes. Similarly, the Company's monthly procurement plans layer in a variety of annual, seasonal, and monthly purchases as well as certain short-term purchases to provide flexibility to adjust for variation to forecast or market volatility.

[1] The number of failed delivery days for GLGT and NEXUS provided are not additive as certain of them were common dates.
[2] https://tcplus.com/Great%20Lakes/Notice/PlannedServiceOutage
[3] https://infopost.enbridge.com/infopost/NXUSHome.asp?Pipe=NXUS

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue:

2

Reference:

[4.2. Annual Demand, pages 16 to 17]

"The base general service annual demand forecast is derived by multiplying the forecasted number of customers (unlocks) by their respective average use forecasts. The base forecast is then adjusted for future Demand Side Management (DSM) activity, and certain additional factors not captured through the forecasting methodology, to obtain the final total general service annual demand forecast."

Question(s):

a) Please provide the impact of future Demand Side Management (DSM) activities on Enbridge's 2025/2026 to 2029/2030 Annual Demand Forecast by year, by rate zone and by rate class (as shown in Table 1).

b) Please break down the response in (a) into residential, commercial and industrial sectors.

c) Please provide detailed explanation and assumptions of the forecast DSM impact provided in (a) and (b).

Response:

a-b) Please see Attachment 1 for the EGD rate zone and Attachment 2 for the Union rate zones. The DSM conservation values in these tables have been provided in a calendar year format.

c) The DSM forecast in Attachment 1 and 2 is based on 2023 OEB-approved targets[1] and escalated to 2025 using the OEB-approved Target Adjustment Methodology (TAM) assuming 100% target achievement and budget spend in preceding years. Years 2026 to 2030 use the same volumes as 2025 as there is no OEB-approved DSM Plan or TAM beyond 2025; those applications are in process. DSM volumes are assumed to be partially effective for the relative calendar year and the years following are cumulative DSM volumes, which is a sum of fully effective DSM volumes for the previous forecasting years and partially effective DSM volumes for the relative year. For example, 2026 volumes include partially effective 2026 DSM volumes and fully effective 2025 DSM volumes. Partially effective volumes account for the fact that DSM projects occur throughout the year, not all on January 1st.

[1] EB-2021-0002, OEB Decision and Order, November 15, 2022, Schedule C.

Table 1
Annual DSM Conservation in Demand Forecast EGD Rate Zones
Calendar Year

Line No.	Particulars (TJ)	2025	2026	2027	2028	2029	2030
		(a)	(b)	(c)	(d)	(e)	(f)
	EGD						
	General Service						
	Rate 1						
1	Residential	261	905	1,549	2,192	2,836	3,479
2	Commercial	-	-	-	-	-	-
3	Industrial	-	-	-	-	-	-
4	Rate 1 Total	261	905	1,549	2,192	2,836	3,479
	Rate 6						
5	Residential	-	-	-	-	-	-
6	Commercial	307	1,061	1,816	2,571	3,325	4,080
7	Industrial	118	409	699	990	1,280	1,571
8	Rate 6 Total	425	1,470	2,515	3,560	4,606	5,651
9	Total General Service	686	2,375	4,064	5,752	7,441	9,130
	Contract						
	Rate 100						
10	Residential	-	-	-	-	-	-
11	Commercial	1	2	4	5	7	9
12	Industrial	10	35	60	85	110	136
13	Rate 100 Total	11	37	64	91	117	144
	Rate 110						
14	Residential	-	-	-	-	-	-
15	Commercial	5	17	29	41	53	65
16	Industrial	95	328	562	796	1,029	1,263
17	Rate 110 Total	100	345	591	837	1,082	1,328
	Rate 115						
18	Residential	-	-	-	-	-	-
19	Commercial	1	3	4	6	8	10
20	Industrial	68	234	400	566	733	899
21	Rate 115 Total	68	236	404	572	740	909
	Rate 135						
22	Residential	-	-	-	-	-	-
23	Commercial	-	-	-	-	-	-
24	Industrial	47	161	276	390	505	619
25	Rate 135 Total	47	161	276	390	505	619
	Rate 145						
26	Residential	-	-	-	-	-	-
27	Commercial	0	1	1	1	2	2
28	Industrial	-	-	-	-	-	-
29	Rate 145 Total	0	1	1	1	2	2
	Rate 170						
30	Residential	-	-	-	-	-	-
31	Commercial	4	14	23	33	43	53
32	Industrial	12	43	74	105	135	166
33	Rate 170 Total	16	57	97	138	178	219
34	Total Contract	242	838	1,433	2,029	2,625	3,221
34	Total EGD	928	3,213	5,497	7,782	10,066	12,351

Table 1
Annual DSM Conservation in Demand Forecast Union Rate Zones
Calendar Year

Line No.	Particulars (TJ)	2025	2026	2027	2028	2029	2030
		(a)	(b)	(c)	(d)	(e)	(f)
	Union North						
	General Service						
	Rate 1						
1	Residential	24	83	142	202	261	320
2	Commercial	10	33	57	80	104	127
3	Industrial	0	0	1	1	1	1
4	Rate 1 Total	34	117	200	283	366	449
	Rate 10						
5	Residential	-	-	-	-	-	-
6	Commercial	10	36	62	87	113	139
7	Industrial	2	7	12	17	22	27
8	Rate 10 Total	12	43	74	104	135	165
9	Total General Service	46	160	273	387	500	614
	Contract						
	Rate 20						
10	Residential	-	-	-	-	-	-
11	Commercial	-	-	-	-	-	-
12	Industrial	25	86	147	208	269	330
13	Rate 20 Total	25	86	147	208	269	330
	Rate 100						
14	Residential	-	-	-	-	-	-
15	Commercial	-	-	-	-	-	-
16	Industrial	38	131	225	318	412	505
17	Rate 100 Total	38	131	225	318	412	505
18	Total Contract	63	217	372	526	680	835
19	Total Union North	109	377	645	913	1,181	1,449
	Union South						
	General Service						
	Rate M1						
20	Residential	161	557	954	1,350	1,747	2,143
21	Commercial	37	128	219	309	400	491
22	Industrial	5	17	29	41	52	64
23	Rate M1 Total	203	702	1,201	1,700	2,199	2,698
	Rate M2						
24	Residential	-	-	-	-	-	-
25	Commercial	62	216	369	523	676	830
26	Industrial	28	97	166	234	303	372
27	Rate M2 Total	90	313	535	757	980	1,202
28	Total General Service	293	1,014	1,736	2,457	3,179	3,900
	Contract						
	Rate M4						
29	Residential	-	-	-	-	-	-
30	Commercial	-	-	-	-	-	-
31	Industrial	241	835	1,429	2,024	2,618	3,212
32	Rate M4 Total	241	835	1,429	2,024	2,618	3,212
	Rate M5						
33	Residential	-	-	-	-	-	-
34	Commercial	-	-	-	-	-	-
35	Industrial	8	27	47	66	86	105
36	Rate M5 Total	8	27	47	66	86	105
	Rate M7						
37	Residential	-	-	-	-	-	-
38	Commercial	-	-	-	-	-	-
39	Industrial	198	687	1,176	1,664	2,153	2,641
40	Rate M7 Total	198	687	1,176	1,664	2,153	2,641
	Rate T1						
41	Residential	-	-	-	-	-	-
42	Commercial	3	9	16	22	29	36
43	Industrial	22	77	133	188	243	298
44	Rate T1 Total	25	87	148	210	272	333
	Rate T2						
45	Residential	-	-	-	-	-	-
46	Commercial	-	-	-	-	-	-
47	Industrial	115	400	684	968	1,252	1,537
48	Rate T2 Total	115	400	684	968	1,252	1,537
49	Total Contract	588	2,036	3,484	4,932	6,380	7,828
50	Total Union South	881	3,051	5,220	7,390	9,559	11,729

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue:

2

Reference:

1. [4.2. Annual Demand, page 17]
"The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system)."

2. [4.2. Annual Demand, pages 17 to 18]
"Major demand driver variables in the residential models include calendar month heating degree days, and vintage variables. While natural gas prices and certain other economic variables were included when developing the models, they were excluded from the final forecast as they were found not to be statistically significant in the residential models. Major demand driver variables in the non-residential models include calendar month heating degree days, employment, and real natural gas prices.

Finally, ET adjustments are applied to the base average use forecast."

Question(s):

a) Please provide the impact of energy transition (ET) adjustments on Enbridge's 2025/2026 to 2029/2030 Annual Demand Forecast by year and by rate zone (as shown in Table 1).

b) Please break down the response in (a) into residential, commercial and industrial sectors.

c) Please provide the impact of ET adjustments on Enbridge's 2025/2026 to 2029/2030 annual number of general service customers forecast by year and by rate zone.

d) Please break down the response in (c) into residential, commercial and industrial sectors.

e) Please provide detailed explanation and assumptions of the ET adjustments provided in (a), (b), (c) and (d).

f) Please provide the list of variables that were excluded from the final forecast as discussed in the reference #2 above.

Response:

a-e) Please see response at Exhibit I.2-PP-2.

f) The variables that were excluded from some of the models include, but are not limited to, nominal and real gas prices, employment, unemployment, and Gross Domestic Product (GDP). Only the variables that were statistically significant were included in the models.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue:

2

Reference:

[4.2 Annual Demand, footnote #25: EGI's Asset Management Plan (2025-2034) filed as EB- 2020-0091, November 8, 2024, Section 4.5]

"In 2024, EGI looked at energy transition signals, as described above, and created Energy Transition adjustments for the 2025 to 2034 forecasts for Toronto (Area 10) and Ontario-wide (excluding Toronto). EGI applied specific Energy Transition adjustments to the forecast related to the City of Toronto because the City of Toronto represents a significant portion of EGI's existing customers, continues to show new construction (residential and commercial) growth, has put forward specific energy transition policies (e.g., TransformTO, and the goal of net zero GHG emissions by 2040), and has taken material action in relation to those policies (e.g., Toronto Green Standard). EGI will continue to monitor how Ontario municipalities implement actionable energy transition initiatives and explore how and if regional Energy Transition adjustments can be further incorporated into EGI's forecasts"

Question(s):

As described in reference #1 above, EGI indicated that it will continue to monitor how Ontario municipalities (including Toronto and others) implement actionable energy transition initiatives and explore how to incorporate regional ET adjustments into its forecast. Has Enbridge incorporated any regional ET adjustments into the forecast in this 5-Year Gas Supply Plan? If yes, please list these Ontario regions, the associated assumptions and their impact on the forecast by year and by rate zone. If not, please explain why.

Response:

Yes, the Energy Transition Adjustments (the Adjustments) are incorporated into the demand forecast used for the development of the 5-Year Gas Supply Plan. The 2024 Adjustments incorporate regionally specific adjustments for the City of Toronto

(Area 10). Please see response at Exhibit I.2-PP-2 for the 2024 Adjustments applied to the forecast and the associated impacts.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue:

2

Reference:

[4.2 Annual Demand, page 19]

"As demonstrated in Table 1, annual demand is forecast to decline on average by approximately 0.4% over the six-year forecast period (2024/25 to 2029/30) driven primarily by declining general service demand and partially offset by increasing contract market demand. Over this period, general service market demand is forecast to decline on average by approximately 0.5% driven by declining average use, energy transition impacts, and DSM consumption savings."

Question(s):

As described in the reference above, the general service market demand is forecast to decline on average by approximately 0.5%. For each sector (i.e. residential, commercial and industrial), please list the top 5 factors and their associated contributions (values could be positive or negative) that result in this 0.5% declining trend.

Response:

Please see response at Exhibit I.2-CME-3.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, p. 27

Question(s):

Please provide a revised version of Table 5 that shows a more detailed breakout of in-franchise supply using the categories of supply discussed in Note 1.

Response:

Please see response at Exhibit I.5-EP-4.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, pp. 37-40
GSP, Appendix C, pp. 6-7
GSP, Appendix J, p. 11

Question(s):

a) (GSP, p. 38 and Appendix J, p. 11) To the extent that the peaking services have been procured through Enbridge Gas's regular annual peaking service RFP process, please further describe the peaking services that will be used to meet the 97.3 TJ/d design day demand shortfall in the Enbridge CDA. As part of the response, please provide the costs of the selected services and the different peaking service options considered.

b) (Appendix C, p. 6) Please provide the detailed calculations supporting the cost variances to base case. As part of the response, please explain which categories of costs are considered.

c) (Appendix C, p .7) Please further explain the storage utilization metric and show the calculation.

Response:

a) Peaking services are procured annually each fall (typically mid-October) via RFP to ensure competitive pricing for delivery areas that have a design day shortfall. For these services the contracted supply is callable over 10 days between December and March and delivered directly into the targeted delivery area. For winter 2024/25, there was no demand fee associated with the successful peaking service bid to the Enbridge CDA. As the service was not called, no cost was incurred. While peaking services are typically inexpensive or at no cost to contract on a demand basis, if called, they can be costly due to the commodity cost at the time they are called upon

(typically extreme winter weather events). Peaking services offered in the market are often tied to Iroquois pricing, which is historically volatile. Over the past 5 years, Iroquois has traded as high as $83.63 USD/MMBtu (winter 2022/23), during an extreme cold event, and $34.44 USD/MMbtu in the most recent winter 2024/25.

Please see response at Exhibit I.4-SEC-9, part b) Attachment 1, filed confidentially, for commodity transaction details for the 2024/25 gas year, including peaking volumes procured.

b) Please see Attachment 1. The cost variances between alternatives reflect the cost output for the entire gas supply plan of the optimization tool Enbridge Gas uses to prepare the gas supply plan, and is comprised of total commodity, transportation and storage (excluding the cost associated with 199.7 PJ of cost-based storage) costs.

c) Please see Attachment 2. The storage utilization figures represent what the increase in planned end of winter storage balance is on average over the five-year period compared to the base case. The higher the number in PJ, the less planned withdrawals from storage occur over the winter season.

Enbridge CDA - Alternative Cost Summary by Year

Line No.	Alternative Number	Particulars ($million)	2024/25	2025/26	2026/27	2027/28	2028/29	Total	Alternative Cost Variance to Base Case (1)	Alternative Cost Variance to Lowest Cost Alternative (Alt 1) (2)
			(a)	(b)	(c)	(d)	(e)	(f)=sum(a:e)	(g)	(h)
1	-	Base Case	1,717.5	1,914.7	1,977.2	1,977.3	1,963.3	9,550.0	-	N/A
	Long-haul									
2	1	2024 TCPL ECOS - Empress to Enbridge CDA	1,720.9	1,921.7	1,980.5	1,979.6	1,971.0	9,573.7	23.7	-
	Third-Party TCPL Assignment Scenarios									
3	2	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)	1,721.6	1,921.3	1,984.0	1,984.2	1,970.3	9,581.4	31.4	7.7
4	3	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 2)	1,723.5	1,922.2	1,985.1	1,985.2	1,971.3	9,587.3	37.3	13.6
5	4	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 3)	1,724.8	1,922.7	1,985.1	1,985.5	1,971.4	9,589.5	39.5	15.8
	Combination of Long-haul and Third-Party Assignment									
6	5	20,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus	1,720.9	1,920.9	1,982.8	1,982.6	1,969.9	9,577.1	27.1	3.4
7		64,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1) (1)								
8	6	40,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus	1,720.5	1,920.9	1,981.9	1,981.3	1,969.7	9,574.3	24.3	0.6
9		44,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1) (1)								

Notes:

(1) Calculated as the total cost of alternative (column (f)) less total cost of base case (line 1, column (f)).

(2) Calculated as the total cost of alternative (column (f)) less total cost of alternative 1 (line 2, column (f)).

Enbridge CDA - Storage Utilization by Year

Line No.	Alternative Number	Particulars (PJ)	2024/25	2025/26	2026/27	2027/28	2028/29	Average	Alternative Increase in End of Winter Storage Balance to Base Case (1)
			(a)	(b)	(c)	(d)	(e)	(f)=avg(a:e)	(g)
1	-	Base Case	14.0	13.6	13.5	14.0	14.8	14.0	-
2	1	2024 TCPL ECOS - Empress to Enbridge CDA	18.1	18.7	18.6	19.1	19.9	18.9	4.9
3	2	Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)	15.6	16.3	16.1	16.6	17.5	16.4	2.4
4	5	20,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus	16.2	16.9	16.7	17.2	18.0	17.0	3.0
5		64,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)							
6	6	40,000 GJ/d 2024 TCPL ECOS - Empress to Enbridge CDA, plus	16.8	17.4	17.3	17.8	18.6	17.6	3.6
7		44,457 GJ/d Third-Party TCPL Assignment - Niagara to Enbridge CDA (Scenario 1)							

Note:
(1) Calculated as the average end of winter storage balance (column (f)) less average end of winter storage balance of base case (line 1, column (f)).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, p. 41
EB-2023-0326, Decision and Order, p. 2
EB-2024-0067, GSP, Appendix K, p. 1

Question(s):

a) Please confirm that the 80,000 dth/day contract extension (effective November 1, 2022) that was at issue in EB-2023-0326 is the same contract that is planned for renewal effective November 1, 2025 as set out in the current Gas Supply Plan.

b) Please confirm that the 80,000 dth/day contract extension at issue in EB-2023-0326 had an average forecast cost premium of $0.09/GJ (or 2.4%) relative to Dawn supply.

c) Please confirm that the most recent previous renewal of a Vector contract (November 1, 2024) for 68,578 GJ/d had an average forecast cost premium of $0.10/GJ (or 1.9%) relative to Dawn supply.

d) Please confirm that the current renewal of the Vector contract (November 1, 2025) has an average forecast cost premium of $0.20/GJ (or 5%) relative to Dawn supply and the total forecast cost premium over the term of the contract is $18.6M.

Response:

a) Confirmed.

At issue in EB-2023-0326 was the prudence of Enbridge Gas's 2021 Vector contracting Decision which dealt with 3 contracts:

- Two contracts were for new capacity (20,000 Dth/d each) for a five-year term beginning November 1, 2021, and expiring October 31, 2026.
- The third contract was for renewal (and negotiated permanent toll reduction) of existing capacity (80,000 Dth/d) extending the term by three years beginning November 1, 2022, and expiring October 31, 2025.[1]

b-d) Confirmed.

Importantly, despite landed cost forecast premium of about $0.10 CAD/GJ for Vector gas supply relative to gas supply purchased at Dawn for the 2021/22 to 2023/24 gas years, the actual cost to ratepayers in those years was a discount to Dawn (ranging from $0.04 to $0.25 CAD/GJ). Please see response at Exhibit I.2-CCC-9 for updated actual Vector costs compared to the results of previously forecasted landed cost analyses. Please also see response at Exhibit I.2-CCC-7 for discussion of ICF's view of Chicago and Dawn futures pricing and current market indications.

Considering the system-wide gas supply benefits (reliability, flexibility, supply diversity) and operational benefits to Enbridge Gas's Sarnia market of Vector capacity, the forecasted cost premium referenced by CCC is relatively moderate especially considering the annual average customer impact of the same would amount to approximately $3.50 or 0.4% of an annual bill.

[1] EB-2023-0072, 2023 Annual Update, Appendix F, p.1.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, p. 41
EB-2024-0067, 2024 GSP, Stakeholder Conference Presentation, p. 39

Question(s):

Please provide a table similar to that shown on Slide 39 ("Sarnia Market on a Design Day") showing the most up-to-date design day demand and supply forecast. As part of the response, please show the design day position both with and without the November 1, 2025 Vector contract extension.

Response:

Please see Table 1 for the Sarnia Industrial Line (SIL) System design day demand and supply position with and without the October 31, 2025, Vector contract extension. On April 3, 2025, Enbridge Gas issued an Expression of Interest and Reverse Open Season for the SIL System which closed on May 12, 2025. Enbridge Gas received incremental firm demand requests above the demands listed in Table 1 and expects the supply surplus to be reduced as a result. Bidders in the area of interest did not request any firm or interruptible turnback or request interruptible services. Enbridge Gas is working with all bidders to finalize demands.

Enbridge Gas notes that the primary purpose of the Vector capacity is for gas supply diversity and reliability. A secondary benefit of the capacity is that it supports the SIL system firm design day needs without the need for additional facilities. This fact was recognized by the OEB in the 2021 Vector Contracting Decision[1]:

> The OEB also accepts Enbridge Gas's submission that the noted SIL benefits were a secondary, location specific consideration, whereas the 2021 Vector contracting decision was primarily based on system-wide gas supply need considerations.

[1] EB-2023-0326, OEB Decision and Order, March 5, 2024, p.12.

Accordingly, Enbridge Gas does not expect the SIL supply to match the demands shown in Table 1. The supply surplus is a result of the primary purpose of the Vector capacity which is for gas supply diversity and reliability.

Table 1
SIL System Winter Design Day Demand and Supply

Line No.	Particulars (TJ/d)	Demand/ Supply (a)	Contract Expiry Date (b)
	Demand		
1	Winter 2024/25 Firm Demand	616.8	
	Supply		
2	Enbridge Gas Facilities	95.4	
3	GLGT	21.1	Oct. 31, 2029
4	DTE/St. Clair	158.3	Oct. 31, 2033
5	Vector	84.4	Oct. 31, 2025
6	Vector	21.1	Oct. 31, 2026
7	Vector	21.1	Oct. 31, 2026
8	Vector	68.6	Oct. 31, 2027
9	Vector	116.0	Oct. 31, 2033
10	Vector Canada Backhaul	84.4	Oct. 31, 2027
11	Total Supply	670.4	
12	Supply Surplus/(Shortfall) with Vector Extension (line 11 – line 1)	53.6	
13	Supply Surplus/(Shortfall) without Vector Extension (line 12 – line 5)	(30.8)	

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, Appendix D, pp. 3, 42-45
EB-2024-0067, Appendix G, 34-36

Question(s):

Please provide a discussion of the differences in ICF's conclusions between its 2023 and 2024 Chicago Natural Gas Price Analysis reports. As part of the response, please advise whether recent actual day-ahead prices are now higher at Chicago than Dawn.

Response:

As referenced, ICF prepared analysis of Chicago natural gas prices for Enbridge Gas in 2023 and 2024, which were subsequently filed as part of the Company's 2024 Annual Update and this 5-Year Gas Supply Plan, respectively.

Both reports reaffirm the strategic value of sourcing gas supply from Chicago in terms of increased supply diversity and avoidance of potential price volatility at alternative natural gas market hubs. In ICF's view, Chicago will remain an attractive supply point, even if the futures risk premium does not decline as expected. Both reports endorse Enbridge Gas maintaining its existing Vector Pipeline capacity long-term and continuing to procure supply at Chicago. However, the 2024 report recognizes recent market volatility experienced at Chicago and basis risk between Chicago and Dawn.

Price Indicators

ICF's 2023 report noted a long-term pricing trend when comparing the price of natural gas at Chicago to Dawn wherein despite there being a risk premium in futures pricing for Chicago relative to Dawn, Chicago day-ahead natural gas prices typically traded at a discount to Dawn, with premiums only occurring during extreme cold-weather events when demand spikes upstream of Chicago.

While ICF's 2024 report reaffirmed its long-term pricing trend (of Chicago day-ahead prices trading at a discount to Dawn) it also highlighted a recent shift wherein Chicago prices traded at a premium to Dawn during the months of July and August of 2023 and 2024, driven by higher Midcontinent prices, marking a departure from historical norms.

ICF Market Forecasts – 2023 vs. 2024

ICF's Q3 2023 base case projected stable long-term demand at both Chicago and Dawn and forecasted that the risk premium in futures pricing for Chicago relative to Dawn would gradually decline, narrowing the Chicago-Dawn spread.

While ICF's Q3 2024 base case also forecasted that the risk premium in futures pricing for Chicago relative to Dawn would gradually decline, it recognized that then recent day-ahead and futures prices reflected a summer premium at Chicago. The observed day-ahead and futures prices were attributed to increased summer gas consumption and declining production in the Midcontinent region, which exerted upward pressure on Chicago prices. ICF's expectation was that Midcontinent production would subsequently recover, reinforcing ICF's longer-term view that Chicago day-ahead natural gas prices could be expected to continue to trade at a discount to Dawn.

Timeframe for Futures Price Realignment

ICF's 2023 report emphasized the potential for near-term realignment between day-ahead and futures prices at Chicago.

ICF's 2024 report emphasized the long-term expectation that the risk premium in futures pricing for Chicago relative to Dawn would gradually decline, in alignment with broader market fundamentals.

Current Market Condition Update

Please see Table 1 and Figures 1 and 2 for a comparison of seasonal average day ahead pricing at Chicago and Dawn up to August 21, 2025. It is evident in the Table and Figures that winter price spikes experienced at Chicago in the winter 2024/25 were moderate relative to the winters of 2022/23 and 2023/24. Similarly, winter 2024/25 and summer 2024/25 day-ahead prices have traded at a discount to Dawn on average. These observations appear to be consistent with ICF's conclusions regarding a realignment of market fundamentals leading to Chicago day-ahead prices trading at a discount to Dawn, and may indicate the beginning of a longer-term gradual decline in the risk premium in futures pricing for Chicago relative to Dawn.

Table 1

Chicago vs. Dawn Day Ahead Price Comparison (Seasonal Averages)

Line No.	Season	Chicago Premium/(Discount) to Dawn USD/MMBtu
1	Summer 2022	(0.014)
2	Winter 2022/23	0.021
3	Summer 2023	0.004
4	Winter 2023/24	0.006
5	Summer 2024	0.026
6	Winter 2024/25	(0.014)
7	Summer 2025 to Current	(0.018)

Figure 1: Chicago vs. Dawn Day-Ahead Price Graph *(including winter price volatility)*

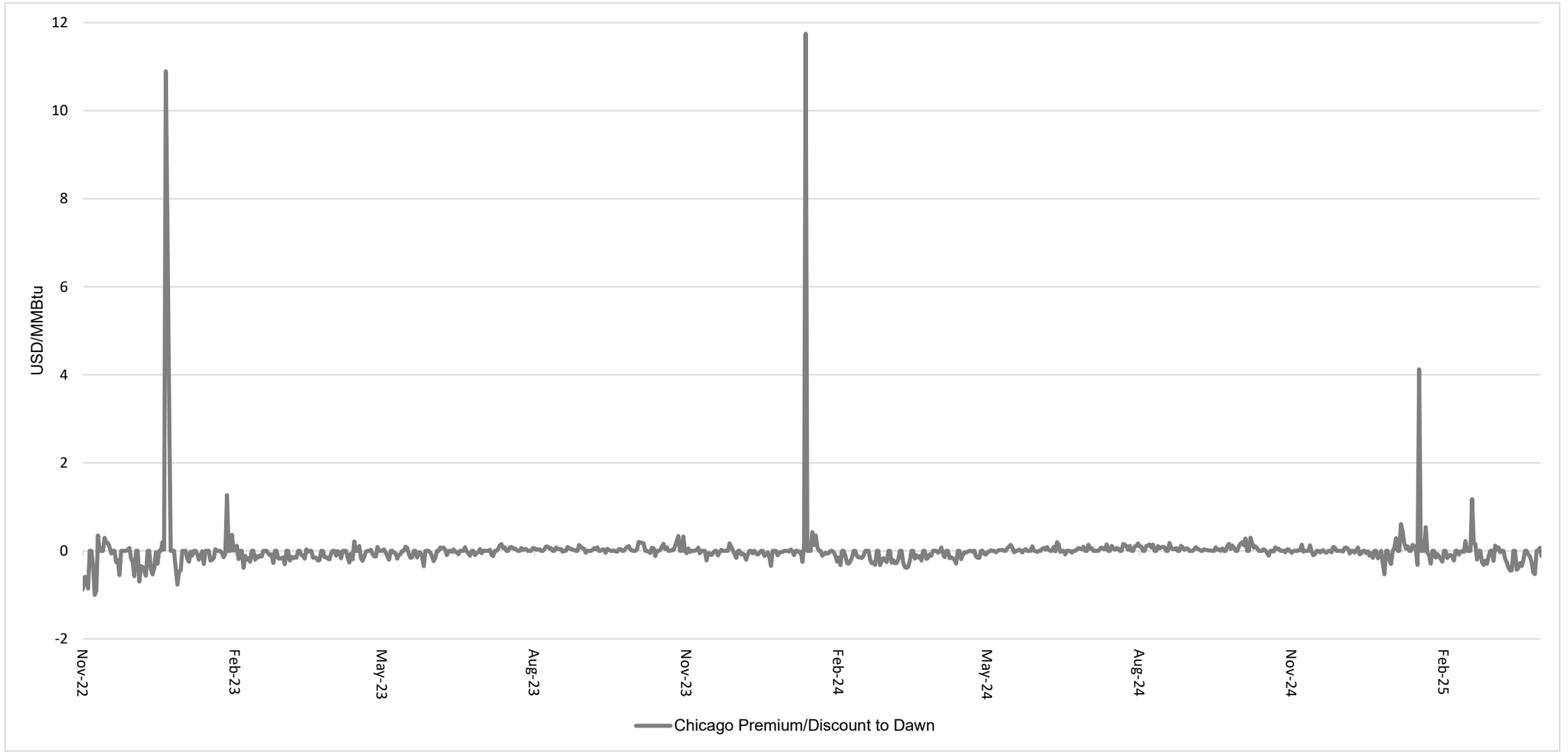
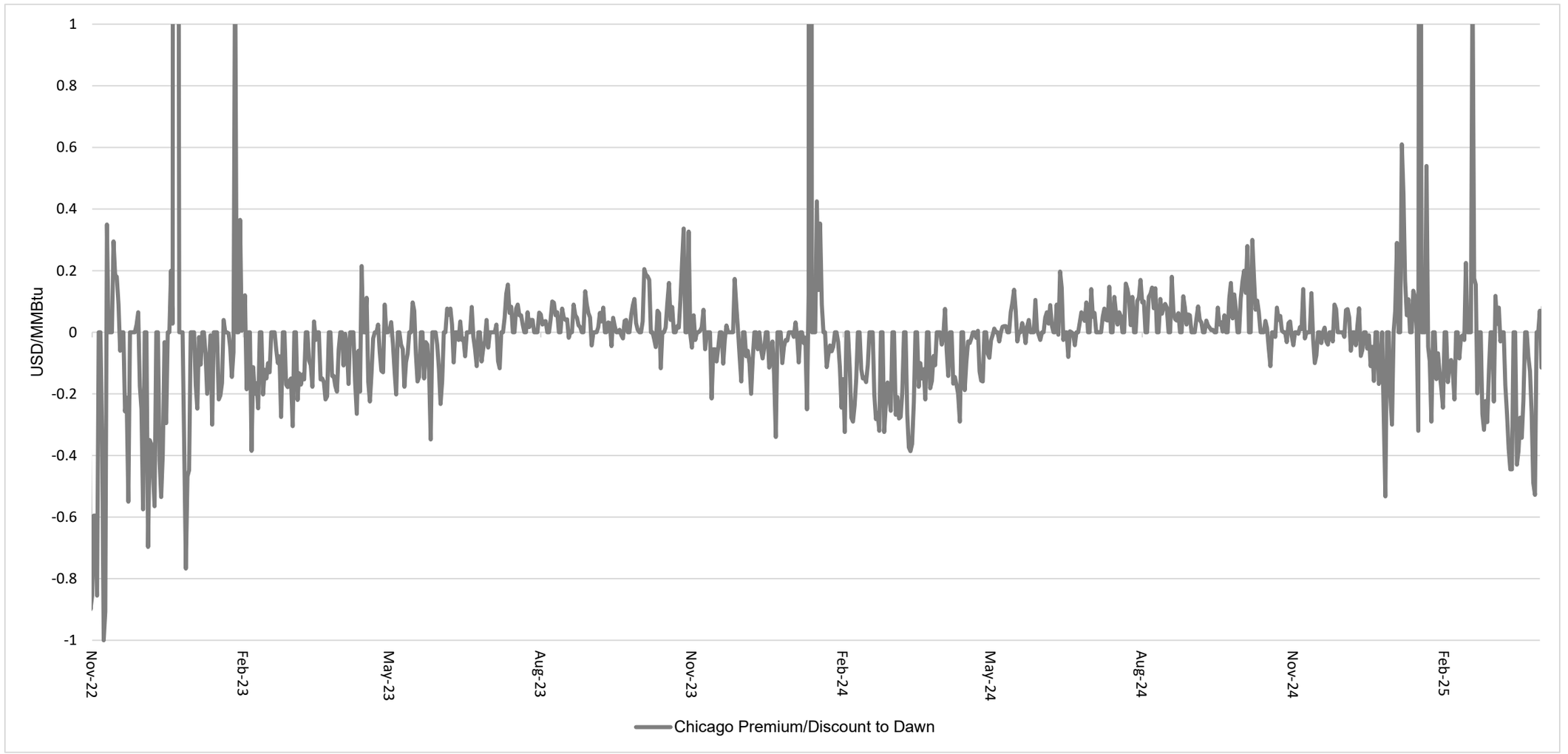


Figure 2: Chicago vs. Dawn Day-Ahead Price Graph *(excluding winter price volatility detail)*



ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, Appendix A, p. 11

Question(s):

a) Please discuss the potential implications, if any, on the overall cost of Enbridge Gas's existing Vector contracts resulting from the referenced FERC Section 5 review.

b) Please confirm that the Vector Pipeline is 60% owned by Enbridge Inc.

Response:

a) Please see response at Exhibit I.3-SEC-7.

b) Confirmed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

2

Reference:

GSP, Appendix I, p. 1

Question(s):

To the extent that it is possible to provide year-to-date information for the 2024/2025 gas year with respect to actual costs, please provide an update to Appendix I (including the landed cost analysis from the 2024 Gas Supply Plan update).

Response:

Please see Attachment 1 for an updated version of Appendix I, including Landed Costs completed in 2023 for the 2024 Gas Supply Plan Update and actual cost information up to July 31, 2025. As 2024/25 gas year actual costs are only partially known at this time, the related values presented in Attachment 1 are expected to differ from final year-end costs.

For explanation regarding the derivation of Appendix I please see response at Exhibit I.2-FRPO-38.

While completing this response, Enbridge Gas discovered an error in the calculation of Actual Vector Premium/(Discount) to Dawn for the 2022/23 and 2023/24 gas years within Appendix I. The actual costs for those gas years has been corrected in Attachment 1 by $0.01 CAD/GJ. An updated version of Appendix I will be filed under separate cover. There are no other aspects of the Company's pre-filed evidence impacted by this error and its subsequent correction.

Cost Effectiveness: Actual Premium/(Discount) Compared to Landed Cost Forecast

Line No.	Particulars ($CAD/GJ)	Gas Year 2021/22	2022/23	2023/24	2024/25
		(a)	(b)	(c)	(d)
	NYMEX				
1	Actual	8.01	4.16	2.93	4.45
	Landed Cost Analysis (1)				
2	2019	N/A	N/A	N/A	N/A
3	2020	3.68	3.68	3.68	N/A
4	2021	3.68	3.70	3.70	3.70
5	2022	N/A	3.78	3.78	3.78
6	2023	N/A	N/A	N/A	3.53
7	2024	N/A	N/A	N/A	N/A
	AECO Premium/(Discount) to Empress				
8	Actual	0.01	(0.48)	0.03	0.04
	Landed Cost Analysis (1)				
9	2019	N/A	N/A	N/A	N/A
10	2020	(0.02)	(0.02)	(0.02)	(0.02)
11	2021	N/A	N/A	N/A	N/A
12	2022	N/A	N/A	N/A	N/A
13	2023	N/A	N/A	N/A	0.00
14	2024	N/A	N/A	N/A	N/A
	GLGT Premium/(Discount) to Dawn				
15	Actual	(0.52)	0.14	(0.42)	(1.46)
	Landed Cost Analysis (1)				
16	2019	0.13	0.13	0.13	N/A
17	2020	0.18	0.18	0.18	N/A
18	2021	0.47	0.48	0.48	0.48
19	2022	N/A	N/A	N/A	N/A
20	2023	N/A	N/A	N/A	0.02
21	2024	N/A	N/A	N/A	N/A
	Niagara Premium/(Discount) to Dawn				
22	Actual	0.50	(1.32)	(0.62)	(0.53)
	Landed Cost Analysis (1)				
23	2019	N/A	N/A	N/A	N/A
24	2020	0.04	0.04	0.04	N/A
25	2021	0.03	0.04	0.04	0.04
26	2022	N/A	N/A	N/A	N/A
27	2023	N/A	N/A	N/A	(0.11)
28	2024	N/A	N/A	N/A	N/A
	Vector Premium/(Discount) to Dawn				
29	Actual	0.80	(0.26)	(0.05)	(0.18)
	Landed Cost Analysis (1)				
30	2019	N/A	N/A	N/A	N/A
31	2020	0.10	0.10	0.10	N/A
32	2021	0.09	0.10	0.10	0.10
33	2022	N/A	N/A	N/A	N/A
34	2023	N/A	N/A	N/A	0.10
35	2024	N/A	N/A	N/A	N/A
	Clarington Premium/(Discount) to Kensington				
36	Actual	(0.93)	(0.05)	(0.38)	(0.43)
	Landed Cost Analysis (1)				
37	2019	N/A	N/A	N/A	N/A
38	2020	0.02	N/A	N/A	N/A
39	2021	N/A	N/A	N/A	N/A
40	2022	N/A	(0.05)	(0.05)	N/A
41	2023	N/A	N/A	(0.18)	(0.18)
42	2024	N/A	N/A	N/A	N/A

Note:

(1) Where a landed cost analysis was prepared in a year, the premium/(discount) is shown in the table. If no landed cost analysis was prepared in a year, N/A is provided. The landed cost analysis prepared annually was used in support of the subsequent year's Gas Supply Plan filing.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Canadian Manufacturers & Exporters (CME)

Interrogatory

Issue:

2

Reference:

EB-2025—0065 Enbridge Gas 5-Year Gas Supply Plan, p. 17

Question(s):

At page 17, EGI stated that “The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system).”

(a) How does EGI apply an energy transition adjustment with respect to industrial, general service customers? If there are differences between the ET adjustment as between various sectors of general service customers, please show the differences and explain why those differences are justified.

(b) If the same ET adjustment is applied regardless of general service sector, please explain why EGI believes there is no difference in the energy transition impact as between sectors.

Response:

a-b) Enbridge Gas does not apply Energy Transition Adjustments (the Adjustments) to industrial general service customers. The industrial general service customer segment represents a very small proportion of the overall general service customer forecast, is a diverse and complex customer segment with varied natural gas end uses, and these customers are widely dispersed across Ontario. As such, application of the Adjustments would have an immaterial impact on the annual number of customers forecast and would be complex to determine. For these

reasons, Enbridge Gas does not apply the Adjustments to industrial customers at this time.

Enbridge Gas conducts an annual review of external signals and internal data to assess potential impacts on natural gas demand, reviews the Adjustments, and determines if changes are warranted to the Adjustments based on the foregoing. Please see Exhibit I.2-PP-2 for more information.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Canadian Manufacturers & Exporters (CME)

Interrogatory

Issue:

2

Reference:

EB-2025—0065 Enbridge Gas 5-Year Gas Supply Plan, p. 17

Question(s):

At page 17, EGI stated that natural gas prices were considered, but ultimately excluded from the final forecast, as they were not found to be statistically significant. Later in the paragraph, EGI stated that real natural gas prices was a major demand driver.

(a) How does EGI calculate real natural gas prices? Is it simply the commodity price adjusted for inflation?

(b) Depending on your answer to a) above, in a higher inflation environment where real prices stayed constant, but nominal prices outpaced wage growth, where nominal prices may become a more statistically significant factor?

Response:

a) Real natural gas price is the total cost Enbridge Gas customers pay for natural gas, which includes both gas costs and delivery costs[1], adjusted for inflation.

b) Yes, in a higher inflation environment where real prices stayed constant, but nominal prices outpace wage growth, it is possible for nominal prices to become a more statistically significant factor. As stated in Phase 1 of the 2024 Rebasing Application[2], Enbridge Gas evaluated various model specifications and driver variables, including but not limited to nominal gas prices, to identify the most suitable models. Variables were included in the model only when they were statistically significant and improved the model's results.

[1] Cost adjustment riders are excluded from the determination of real natural gas prices.
[2] EB-2022-0200, Exhibit 3, Tab 2, Schedule 5, page 5, paragraph 12.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Canadian Manufacturers & Exporters (CME)

Interrogatory

Issue:

2

Reference:

EB-2025—0065 Enbridge Gas 5-Year Gas Supply Plan, p. 19

Question(s):

EGI stated that general service market demand is forecast to decline by approximately .5% over the plan period, driven by declining average use, energy transition impacts, and DSM consumption savings.

(a) Please break out the total decline amongst the factors listed above.

(b) With respect to declining average use, is this factor the decline in average use separate from the other two factors (in other words, not including any decline in average use caused by the energy transition or DSM savings?) If so, please explain what factors are impacting declining average use apart from the energy transition and DSM savings.

Response:

a) Please see Table 1 for the associated contributions of the change that resulted in approximately 0.5% average decline in annual demand for the period of 2025 to 2030. The 0.5% decline in annual demand as shown in Table 1, line 12, column (e) is a result of a 0.7% decrease from energy transition (ET) and future DSM adjustments, partially offset by a 0.2% increase in the base forecast.

Table 1

2025-2030 Average Annual Demand Change Contributors (%)

Line No.	Particulars	Base Forecast	ET on Customers (Egress) (1)	Future DSM	ET on Average use (Toronto Green Standard) (2)	Final Forecast
		(a)	(b)	(c)	(d)	(e = a+b+c+d)
	Residential					
1	Average number of customers	0.90%	-0.25%	-	-	0.65%
2	Average use per customer	-0.33%	0.00%	-0.34%	-0.01%	-0.67%
3	Annual Demand	0.57%	-0.25%	-0.34%	-0.01%	-0.02%
	Commercial					
4	Average number of customers	-0.64%	-0.62%			-1.25%
5	Average use per customer	0.01%	-0.03%	-1.33%	-0.32%	-1.66%
6	Annual Demand	-0.62%	-0.64%	-1.31%	-0.32%	-2.89%
	Industrial					
7	Average number of customers	-1.35%	-	-	-	-1.35%
8	Average use per customer	1.28%	-	-1.12%	0.00%	0.16%
9	Annual Demand	-0.08%	-	-1.10%	0.00%	-1.18%
	Total EGI					
10	Average number of customers	0.84%	-0.25%	-	-	0.59%
11	Average use per customer	-0.62%	0.00%	-0.42%	-0.03%	-1.07%
12	Annual Demand	0.21%	-0.24%	-0.42%	-0.03%	-0.48%

Notes:

(1) No energy transition egress adjustment is applied to the Industrial sector. Please see Exhibit I.2-CME-1.

(2) Applicable only to the City of Toronto within the EGD Rate Zone.

b) With respect to drivers of declining average use in base residential and non-residential forecast, separate from the other two factors (energy transition and future DSM savings) please see Phase 1 of the 2024 Rebasing Application.[1]

[1] EB-2022-0200, Exhibit 3, Tab 2, Schedule 5, Section 3.2 and 4.2.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Canadian Manufacturers & Exporters (CME)

Interrogatory

Issue:

2

Reference:

EB-2025—0065 Enbridge Gas 5-Year Gas Supply Plan, Appendix A, p. 10 of 14

Question(s):

At page 10, EGI stated that “Currently, Enbridge Gas continues to experience strong demands from its customer base in Ontario, particularly during cold winter conditions like those experienced during the winter of 2024/25.

However, in response to an interrogatory in EB-2025-0064 (CME-12) EGI stated that the winter of 2024/2025 was warmer than forecast.

(a) Please confirm that EGI experienced lower demand than forecast during the winter of 2024/2025. If not confirmed, please explain why.

(b) Please confirm what impact, if any, less demand than forecast would have on EGI’s gas supply planning and analysis, if any.

Response:

a) Confirmed. While the overall winter season was slightly warmer than forecast, there were short periods of cold winter conditions during the season.

b) Please see response at Exhibit I.3-ED-3.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Tables 1, 4

Question(s):

(a) Please provide the historical and forecast consumption per customer from 2010 to 2045 (or as far out as possible) for residential, commercial, industrial, and power sector customers.

(b) Please provide a table showing the historical and forecast number of customers from 2010 to 2045 (or as far out as possible) for each customer type (residential, commercial, industrial, and power sector).

Response:

a-b) The gas supply plan is not modelled at the residential, commercial, industrial, and power sector level. Enbridge Gas's demand forecast, and gas supply plan modelling is prepared on a basis of a 10-year horizon, the 5-Year Gas Supply Plan is based on the first five years of the forecast period.

To be responsive, Enbridge Gas has provided the annual demand forecast for the 2025-2030 period covered by the gas supply plan. Please see Attachment 1, Table 1 for the historical (2019-2024) and forecast (2025-2030) average use per customer and average number of customers at the sector level (residential, commercial, industrial) for the general service market. Please see Attachment 1, Table 2 for the historical (2019-2024) and forecast (2025-2030) average usage by customer and average number of customers, separated by power and other for the contract market.

Table 1
General Service Average Use per Customer and Average Number of Customers

Line No.	Particulars	2019 Actual	2020 Actual	2021 Actual	2022 Actual	2023 Actual	2024 Actual	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	Average Use per Customer (m^3) (1)												
1	Residential	2,531	2,297	2,194	2,344	2,112	2,019	2,246	2,227	2,211	2,196	2,183	2,171
2	Commercial	24,482	21,816	20,516	22,462	21,206	20,331	22,307	22,094	21,906	21,727	21,517	21,331
3	Industrial	109,600	91,361	85,852	88,756	78,182	79,338	85,055	85,061	85,180	85,365	85,553	85,739
	Average Number of Customers												
4	Residential	3,424,068	3,463,393	3,501,048	3,537,833	3,582,986	3,621,237	3,655,942	3,689,687	3,718,866	3,743,181	3,762,175	3,776,252
5	Commercial	280,104	281,894	283,413	283,141	283,928	286,085	286,426	286,968	287,109	286,830	286,104	284,980
6	Industrial	10,996	10,985	10,960	11,070	10,976	10,898	10,498	10,378	10,250	10,112	9,966	9,810

Note:
(1) Actual average use (2019-2024) is unnormalized and forecast average use (2025-2030) is normalized to 2025 budget degree days.

Table 2
Average Demands per Contract Market Customer and Average Number of Customers

Line No.	Particulars (10^3m^3)	2019 Actual (a)	2020 Actual (b)	2021 Actual (c)	2022 Actual (d)	2023 Actual (e)	2024 Actual (f)	2025 Forecast (g)	2026 Forecast (h)	2027 Forecast (i)	2028 Forecast (j)	2029 Forecast (k)	2030 Forecast (l)
	Average Annual Demands per Customer (10^3m^3) (1)												
1	Power	11,159	10,295	11,560	11,345	11,639	11,140	11,372	11,372	11,372	11,372	11,372	11,372
2	Other	4,113	3,813	3,804	3,896	3,740	3,681	4,036	4,006	4,113	4,093	4,072	4,051
	Average Number of Customers (1)												
3	Power	14	14	14	14	14	14	14	14	14	14	14	14
4	Other	756	816	884	912	943	966	939	939	939	939	939	939
5	Total Contract Customer	770	830	898	926	957	980	953	953	953	953	953	953

Note:
(1) Customer count includes only Contract Market customers whose demands are included as part of the Gas Supply Plan annual demand forecast (excludes semi-unbundled and unbundled customers).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Figure 3, Tables 1, 4

Question(s):

(a) Please file a copy of all of Enbridge's long-range gas demand and gas consumption forecasts. Please include Enbridge's 20-year forecast.

(b) Please provide a table with the numbers underlying Figure 3. Please also provide those figures in m3 instead of PJ.

(c) Please provide a table comparing Enbridge's gas demand and consumption forecasts with the one in Figure 3.

Response:

a) Enbridge Gas does not generate a 20-year forecast but only a 10-year forecast. However, to inform this plan, the first five years of the 10-year forecast (from November 2024 to October 2030) are used as provided in Table 1.

b) Table 1 reflects volumes used to prepare Figure 3 in the 5-Year Gas Supply Plan.

Table 1
2025/26 Proportion of Customer Demand Volumes by Service Type

Line No.	Particulars	Annual Demand		% of Total
		TJ	10^3m^3	
	(a)	(b)	(c)	(d)
	General Service			
1	Sales Service	501,507	12,829,551	81%
2	Direct Purchase	115,465	2,953,823	19%
3	Total General Service	616,972	15,783,374	81%
	Contract			
4	Sales Service	10,859	277,804	7%
5	Direct Purchase	134,896	3,450,902	93%
6	Total Contract	145,755	3,728,706	19%
7	Total Annual Demand	762,727	19,512,080	100%

c) Table 1 reflects the annual demand forecast of consumption used to prepare the 5-Year Gas Supply Plan.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Tables 1, 2

Question(s):

(a) Please provide all demand forecasts for the 2024/25 to 2029/30 period that have been calculated in support of, or as part of Enbridge's capital planning, including the EGI Assessment Management Plan 2025-2034.

(b) Please compare and contrast any figures identified above with the demand forecasts outlined in the Gas Supply Plan.

Response:

a-b) The design day demand forecast used in the 2025 to 2034 Asset Management Plan (AMP)[1] and the submitted 5-Year Gas Supply Plan are consistent. Enbridge Gas declines to provide "all demand forecasts for the 2024/25 to 2029/30 period that have been calculated in support of, or as part of Enbridge's capital planning" as those demand forecasts are not relevant to the Issues List in this proceeding.

[1] EB-2020-0091.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Tables 1, 2, 3, 23, 26

Preamble:

Table 1 shows an average annual decrease in forecasted demand of .4% from 2024/25 to 2029/30. Table 2 shows a decrease in forecasted annual demand for sales service customers over the same six-year forecast period. By contrast, Table 4 asserts an increase in design day demand forecast over that period, resulting in related supply shortfalls.

Question(s):

(a) Please explain how forecasted design day demand increases over the forecast period while average annual demand decreases.

(b) Enbridge reported that actual unutilized capacity in 2022/23 and 2023/24, was higher than initial forecasts. This was attributed to warmer than normal weather. During the same period, planned HDD was higher than the actuals. How are these trends accounted for in the current analysis of forecasted design day demand?

Response:

a) Average annual demand is declining as customers become more efficient. This may be due to higher efficiency of gas burning equipment, adoption of time of use thermostats, building envelope improvements or process or behavioral changes. On design day, customers continue to consume high amounts of natural gas despite these improvements. As a result, the annual use is declining more significantly than design day use. On an annual basis, the decline in average use is outpacing the rate of customer growth. On design day, the rate of customer growth is outpacing the decline in design day demand.

b) Winter 2022/23 and Winter 2023/24 had higher actual unutilized capacity than initially forecast because these two winters were warmer on average than planned for. In a warmer than normal winter, actual HDD will be lower than planned HDD. This is a normal occurrence as each year may experience different temperatures, warmer or colder than the previous, and does not represent a trend. As an example, Winter 2024/25 was colder than the previous two winters.

   The design day demand is based on the HDDw from the coldest day observed since Winter 1993/94. The design day demand is developed based on actual consumption data from the most recent year. Design day is not expected to occur each year, however it has to be planned for, which will result in unutilized capacity if the design HDDw does not occur.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Section 5.1, pp 31-32

Preamble:

Enbridge identifies potential changes in transportation contract length due to market trends and anticipated contract expiries. Environmental Defence seeks to understand the proportion of short vs. long-term contracts used by Enbridge.

Question(s):

To the best of Enbridge's ability:

(a) Please provide a breakdown of Enbridge's current and planned transportation contracts based on contract length.

(b) Please provide a breakdown of Enbridge's current and planned gas supply contracts based on contract length.

Response:

a) Please see Attachment 1 for a breakdown by pipeline of Enbridge Gas's current transportation contracts based on contract expiry (length), as contained within the Company's 5-Year Gas Supply Plan. The Company does not forecast future transportation contracts.

b) Please see Attachment 2 for actual and proposed gas supply purchase volumes for the 2024/25 gas year, organized by purchase term and supply location, as of August 31, 2025. Please note that the figures set out in Attachment 2:

- Exclude variable supply contracts ranging from 0 to 19,000 GJ/d (as such volumes vary daily and are typically used to manage fuel and upstream operational constraints);
- Exclude third-party services such as peaking arrangements (as such services/volumes were not called upon in the 2024/25 gas year); and
- Categorize “Seasonal” purchases as those representing either full summer/winter seasons or two or more consecutive months in one of those seasons.

The Company’s annual procurement strategy, which is based on its annual gas supply plan, is actively monitored and re-assessed monthly, enabling Enbridge Gas to respond rapidly to changes in market conditions, operational needs, and customer demand. Please see response at Exhibit I.2-STAFF-15 for an explanation of how Enbridge Gas determines the appropriate portion of gas supply reserved for short-term contracts vs. that contracted via annual and seasonal contracts. For further detail on actual commodity purchases for the 2024/25 gas year, please see response at Exhibit I.4-SEC-9.

Summary of November 1, 2024 Upstream Transportation Contracts

Line No.	Upstream Pipeline	Service	Primary Receipt Point	Primary Delivery Point	Contract Quantity	Contract Units (1)	Contract Termination Date
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1	Centra Pipelines Minnesota Inc.	FT	Sprague	Baudette	5,197	MCF	31-Oct-2025
2	Centra Transmission Holdings Inc.	FT	Spruce	Union MDA	147	10^3m^3	31-Oct-2025
3	St. Clair Pipelines	FT	St. Clair/Intl Border	St. Clair/Intl Border	214,000	GJ	31-Oct-2025
4	St. Clair Pipelines	FT	Bluewater/Intl Border	Bluewater/Intl Border	127,000	GJ	31-Oct-2025
5	TransCanada	FT	Union Dawn	Enbridge CDA	4,818	GJ	31-Oct-2026
6	TransCanada	FT	Union Dawn	Enbridge CDA	145,000	GJ	31-Oct-2026
7	TransCanada	FT	Union Dawn	Enbridge EDA	114,000	GJ	31-Oct-2026
8	TransCanada	FT	Union Dawn	Iroquois	40,000	GJ	31-Oct-2026
9	TransCanada	FT	Union Parkway Belt	Enbridge CDA	572	GJ	31-Oct-2026
10	TransCanada	FT	Empress	Union EDA	1,089	GJ	31-Oct-2026
11	TransCanada	FT	Empress	Centrat MDA	4,522	GJ	31-Oct-2026
12	TransCanada	FT	Empress	Centrat MDA	1,043	GJ	31-Oct-2026
13	TransCanada	FT	Empress	Union NDA	4,056	GJ	31-Oct-2026
14	TransCanada	FT	Empress	Union SSMDA	2,700	GJ	31-Oct-2026
15	TransCanada	FT	Empress	Union SSMDA	12,800	GJ	31-Oct-2026
16	TransCanada	FT	Empress	Union SSMDA	6,143	GJ	31-Oct-2026
17	TransCanada	FT	Empress	Union WDA	39,880	GJ	31-Oct-2026
18	TransCanada	FT	Empress	Union WDA	11,527	GJ	31-Oct-2026
19	TransCanada	FT	Parkway	Union EDA	30,000	GJ	31-Oct-2026
20	TransCanada	FT	Parkway	Union EDA	5,000	GJ	31-Oct-2026
21	TransCanada	FT	Dawn	Union ECDA	8,000	GJ	31-Oct-2026
22	TransCanada	FT	Empress	Emerson 2	21,418	GJ	31-Oct-2026
23	TransCanada	FT	Empress	Union ECDA	3,000	GJ	31-Oct-2026
24	TransCanada	FT	Niagara	Kirkwall	21,101	GJ	31-Oct-2026
25	TransCanada	FT-SN	Union Parkway Belt	Victoria Square #2 CDA	85,000	GJ	31-Oct-2026
26	TransCanada	STS - Firm Injection	Parkway	Enbridge CDA	153,700	GJ	31-Oct-2026
27	TransCanada	STS - Firm Injection	Parkway	Enbridge CDA	92,822	GJ	31-Oct-2026
28	TransCanada	STS - Firm Injection	Parkway	Enbridge CDA	37,370	GJ	31-Oct-2026
29	TransCanada	STS - Firm Injection	Parkway/Kirkwall	Enbridge EDA	35,089	GJ	31-Oct-2026
30	TransCanada	STS - Firm Injection	Parkway	Enbridge EDA	35,806	GJ	31-Oct-2026
31	TransCanada	STS - Firm Injection	Parkway	Enbridge EDA	9,716	GJ	31-Oct-2026
32	TransCanada	STS - Firm Injection	Union EDA	Parkway	5,000	GJ	31-Oct-2026
33	TransCanada	STS - Firm Injection	Union NDA	Parkway	49,100	GJ	31-Oct-2026
34	TransCanada	STS - Firm Injection	Union WDA	Parkway	3,150	GJ	31-Oct-2026
35	TransCanada	STS - Firm Withdrawl	Parkway	Enbridge CDA	153,700	GJ	31-Oct-2026
36	TransCanada	STS - Firm Withdrawl	Parkway	Enbridge CDA	92,822	GJ	31-Oct-2026
37	TransCanada	STS - Firm Withdrawl	Parkway	Enbridge CDA	37,370	GJ	31-Oct-2026
38	TransCanada	STS - Firm Withdrawl	Parkway/Kirkwall	Enbridge EDA	35,089	GJ	31-Oct-2026
39	TransCanada	STS - Firm Withdrawl	Parkway	Enbridge EDA	35,806	GJ	31-Oct-2026
40	TransCanada	STS - Firm Withdrawl	Parkway	Enbridge EDA	9,716	GJ	31-Oct-2026
41	TransCanada	STS - Firm Withdrawl	Parkway	Union EDA	26,351	GJ	31-Oct-2026
42	TransCanada	STS - Firm Withdrawl	Parkway	Union NCDA	13,704	GJ	31-Oct-2026
43	TransCanada	STS - Firm Withdrawl	Parkway	Union NDA	48,375	GJ	31-Oct-2026
44	TransCanada	STS - Firm Withdrawl	Dawn	Union SSMDA	35,022	GJ	31-Oct-2026
45	TransCanada	STS - Firm Withdrawl	Parkway	Union WDA	31,420	GJ	31-Oct-2026
46	Vector	FT	Chicago	Cdn/US Interconnect	20,000	DTH	31-Oct-2026
47	Vector	FT	Cdn/US Interconnect	Dawn (Union)	21,101	GJ	31-Oct-2026
48	Vector	FT	Chicago	Cdn/US Interconnect	20,000	DTH	31-Oct-2026
49	Vector	FT	Cdn/US Interconnect	Dawn (Union)	21,101	GJ	31-Oct-2026
50	NOVA	FT	NIT	Empress	50,000	GJ	31-Oct-2027
51	PEPL	FT	Panhandle Field Zone	Ojibway (Union)	35,000	DTH	31-Oct-2027
52	PEPL	FT	Panhandle Field Zone	Ojibway (Union)	22,000	DTH	31-Oct-2027
53	TransCanada	FT	Union Parkway Belt	Enbridge CDA		GJ	31-Oct-2027
54	TransCanada	FT	Empress	Union EDA	4,000	GJ	31-Oct-2027
55	TransCanada	FT	Empress	Union WDA	3,396	GJ	31-Oct-2027
56	TransCanada	FT	Empress	Union NCDA	1,412	GJ	31-Oct-2026
57	Vector	FT	Alliance	St. Clair	65,000	DTH	31-Oct-2027
58	Vector	FT	St. Clair	Dawn	68,579	GJ	31-Oct-2027
59	Vector	FT	Dawn-Vector	Courtright	84,404	GJ	31-Oct-2027
60	NOVA	FT	NIT	Empress	75,000	GJ	31-Oct-2028
61	Vector	FT	Chicago	Cdn/US Interconnect	80,000	DTH	31-Oct-2028
62	Vector	FT	Cdn/US Interconnect	Dawn (Union)	84,404	GJ	31-Oct-2028
63	Great Lakes	FT	Emerson	St. Clair	20,000	DTH	31-Oct-2029
64	Great Lakes	FT	St. Clair	Union SWDA	21,101	GJ	31-Oct-2029
65	TransCanada	FT	Chippawa	Enbridge Parkway CDA	123,441	GJ	31-Oct-2030
66	TransCanada	FT	Empress	Enbridge CDA	34,457	GJ	31-Oct-2030
67	TransCanada	FT	Niagara Falls	Enbridge Parkway CDA	76,559	GJ	31-Oct-2030
68	TransCanada	FT	North Bay Junction	Enbridge CDA	5,000	GJ	31-Dec-2030
69	TransCanada	FT	North Bay Junction	Enbridge EDA	163,044	GJ	31-Dec-2030
70	TransCanada	FT	North Bay Junction	Enbridge EDA	70,000	GJ	31-Dec-2030
71	TransCanada	FT	North Bay Junction	Enbridge EDA	26,956	GJ	31-Dec-2030
72	TransCanada	FT (LTFP)	Empress	North Bay Junction	163,044	GJ	31-Dec-2030
73	TransCanada	FT (LTFP)	Empress	North Bay Junction	70,000	GJ	31-Dec-2030
74	TransCanada	FT (LTFP)	Empress	North Bay Junction	5,000	GJ	31-Dec-2030
75	TransCanada	FT (LTFP)	Empress	North Bay Junction	26,956	GJ	31-Dec-2030
76	TransCanada	FT	Union Parkway Belt	Enbridge EDA	170,000	GJ	31-Oct-2031
77	TransCanada	FT	Parkway	Union EDA	75,000	GJ	31-Oct-2031
78	TransCanada	FT	Parkway	Union EDA	181	GJ	31-Oct-2031
79	TransCanada	FT	Parkway	Union EDA	9,105	GJ	31-Oct-2031
80	TransCanada	FT	Parkway	Union NCDA	661	GJ	31-Oct-2031
81	TransCanada	FT	Parkway	Union NCDA	439	GJ	31-Oct-2031
82	TransCanada	FT	Parkway	Union NDA	10,000	GJ	31-Oct-2031
83	TransCanada	FT	Parkway	Union NDA	67,000	GJ	31-Oct-2031
84	TransCanada	FT	Parkway	Union NDA	24,000	GJ	31-Oct-2031
85	TransCanada	FT	Parkway	Union NDA	9,000	GJ	31-Oct-2031
86	TransCanada	FT	Parkway	Union NDA	10,401	GJ	31-Oct-2031
87	TransCanada	FT	Parkway	Union NDA	6,228	GJ	31-Oct-2031
88	TransCanada	FT (EMB)	Parkway	Union EDA	25,000	GJ	31-Oct-2031
89	TransCanada	FT	Union Parkway Belt	Enbridge CDA	40,093	GJ	31-Oct-2032
90	TransCanada	FT	Union Parkway Belt	Enbridge CDA	70,000	GJ	31-Oct-2032
91	TransCanada	FT	Union Parkway Belt	Enbridge CDA	15,000	GJ	31-Oct-2032
92	TransCanada	FT	Union Parkway Belt	Enbridge CDA	8,375	GJ	31-Oct-2032
93	TransCanada	FT	Union Parkway Belt	Enbridge CDA	24,484	GJ	31-Oct-2032
94	TransCanada	FT	Union Parkway Belt	Enbridge EDA	6,000	GJ	31-Oct-2032
95	TransCanada	FT	Union Parkway Belt	Enbridge EDA	13,114	GJ	31-Oct-2032
96	TransCanada	FT	Parkway	Union EDA	5,000	GJ	31-Oct-2032
97	TransCanada	FT	Parkway	Union NCDA	887	GJ	31-Oct-2032
98	TransCanada	FT	Parkway	Union NCDA	2,000	GJ	31-Oct-2032
99	TransCanada	FT	Kirkwall	Union CDA	135,000	GJ	31-Oct-2032
100	NEXUS	FT	Kensington	Milford Junction	55,000	DTH	31-Oct-2033
101	NEXUS	FT	Clarington	Milford Junction	55,000	DTH	31-Oct-2033
102	NEXUS	FT	Kensington	St. Clair (Union)	150,000	DTH	31-Oct-2033
103	TransCanada	FT	Parkway	Union EDA	9,128	GJ	31-Oct-2033
104	TransCanada	FT	Parkway	Union NCDA	6,912	GJ	31-Oct-2033
105	TransCanada	FT	Parkway	Union NCDA	884	GJ	31-Oct-2033
106	Vector	FT	Milford Junction	St. Clair	110,000	DTH	31-Oct-2033
107	Vector	FT	St. Clair	Dawn	116,056	GJ	31-Oct-2033
108	TransCanada	FT	Union Parkway Belt	Enbridge CDA	75,000	GJ	31-Oct-2034
109	TransCanada	FT	Union Parkway Belt	Enbridge CDA	100,000	GJ	31-Oct-2036
110	TransCanada	FT	Union Parkway Belt	Enbridge EDA	25,000	GJ	31-Oct-2036

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Purchase Term	Pipeline/ Location	Contracted Volume (GJ)
	(a)	(b)	(c)
1	< 1 Month	CLARINGTON	245,746
2	< 1 Month	DAWN	16,494,798
3	Monthly	AECO	9,100,000
4	Monthly	CLARINGTON	8,524,513
5	Monthly	DAWN	51,714,602
6	Monthly	NIAGARA	9,198,100
7	Monthly	PEPL	14,264,647
8	Monthly	TCPL	21,822,747
9	Monthly	VECTOR	19,770,712
10	Seasonal	AECO	18,250,000
11	Seasonal	CLARINGTON	12,323,130
12	Seasonal	DAWN	31,979,050
13	Seasonal	KENSINGTON	27,916,092
14	Seasonal	NIAGARA	22,076,661
15	Seasonal	PEPL	4,540,570
16	Seasonal	TCPL	47,876,000
17	Seasonal	VECTOR	45,729,168
18	Annual	AECO	18,250,000
19	Annual	CHIPPAWA	45,055,965
20	Annual	CLARINGTON	25,801,485
21	Annual	KENSINGTON	27,149,430
22	Annual	NIAGARA	17,714,545
23	Annual	TCPL	18,250,000

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Table 22

Preamble:

Enbridge identifies a link between the Gas Supply Plan and future leave to construct applications. The following questions are intended to explore the connection, if any, between gas supply planning and capital development.

Question(s):

(a) Please identify any infrastructure investments that are likely to flow from the gas supply plan over the next ten years. For any that have been identified, please list the cost and provide a supply/demand excess/shortfall table.

(b) Is Enbridge expecting to propose any upgrades to the Dawn-Parkway system that it would apply for between now and 2035?

(c) Please provide a table showing any Dawn-Parkway expansion projects that Enbridge is currently planning within its capital planning horizon. Please include columns for forecast cost, application date, in-service date, and capacity.

(d) If the design day demand forecasts set out in the Plan were flat or decreasing, could any projects in Enbridge's latest AMP be deferred? If yes, please indicate which and explain why for each

(e) Are there any projects in Enbridge's AMP that could be addressed through different gas supply options instead of infrastructure investments? If yes, please indicate which and identify each.

Response:

a-c) Enbridge Gas currently has no infrastructure investment plans resulting directly and solely from needs identified within the 5-Year Gas Supply Plan. Instead, the most recent 2025 to 2034 Asset Management Plan (AMP)[1] forecasts projects based on potential future customer demands (forecasted at that time) and integrity needs to provide an indication of facility projects that could satisfy those needs, if they are ultimately realized. The precise timing and magnitude of customer/integrity needs is dynamic in nature, changing from year to year due to a wide variety of factors including but not limited to natural gas market fundamentals, industrialization, government policy, broader economic conditions, energy transition, and operating conditions. The timing and scope of projects identified in the Company's AMP is often adjusted as a result.

There are currently two Dawn-Parkway Expansion Projects included in the AMP, one in 2028 (Kirkwall-Hamilton NPS 48), and one in 2030 (Dawn Enniskillen NPS 48). The forecasted costs and in-service dates of these projects are described in Investment Summary Reports found on pages 42 and 43 of Appendix A to the AMP. As explained above, the ultimate timing, need (including the nature of customer demands driving that need, be they in-franchise or ex-franchise), and scope of those projects is yet to be determined. However, the information set out within the AMP represents the Company's best estimate of a facility project(s) that could satisfy the needs previously identified. Further, until a project need (be it customer demand, integrity, or a combination of these) is formally established (e.g., through new capacity open season, or formal request for capacity) the Company does not take any further steps to formally commence project development. As previously stated, none of the demands contemplated within the Company's 5-Year Gas Supply Plan have resulted in a formal request for additional transportation service capacity at this time (Dawn Parkway System or other).

Please see response at Exhibit I.2-STAFF-12 for a discussion on how Enbridge Gas's annual gas supply planning process seeks to leverage available third-party alternative options to address capacity shortfalls identified, and maximizing utilization of existing Company-owned facilities.

d-e) These questions are not relevant to the Issues List in this proceeding. The Company's current AMP is not in scope for this case. To the extent that Enbridge Gas later seeks leave to construct approval for projects in the AMP, then parties may at that time raise questions about the impacts of gas supply options on the subject project.

[1] EB-2020-0091, Enbridge Gas Asset Management Plan, 2025-2034, November 8, 2024.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Section 6.1, p. 64

Preamble:

Enbridge identifies current trade disputes with the United States as an important global policy development, with potential impacts on gas supply planning. The following questions are aimed at understanding the proportion of current and planned gas supply that is procured from the United States.

Question(s):

(a) Please provide a break-out of the percentage of gas supply between 2023-24 and 2029-30 that was/is planned to be extracted in the U.S., Alberta, Saskatchewan, and B.C. Please also provide the figures in m3. Please make estimates and assumptions as needed.

(b) Please provide a break-out of the percentage of gas supply between 2023-24 and 2029-30 that was/is planned to enter Ontario from the United States. Please also provide the figures in m3. Please make estimates and assumptions as needed.

Response:

a) Please see Table 1 for the U.S. and Alberta supply as included in the respective gas supply plan annual demand sources of supply[1]. Enbridge Gas does not purchase gas in Saskatchewan or B.C and therefore these locations have been omitted from the tables below. U.S. supply is comprised of total gas sourced at Appalachia, Chicago, Niagara and U.S. Mid-Continent supply sources. Alberta supply is comprised of total gas sourced from the Western Canada Sedimentary Basin supply source.

Table 1

U.S. and Alberta Planned Supply Purchases

Line No.	Particulars	Supply Source (TJ)		Supply Source (10^3m^3)		Supply Source (%)	
		U.S.	Alberta	U.S.	Alberta	U.S.	Alberta
		(a)	(b)	(c)	(d)	(e)	(f)
1	2023/24	275,850	108,592	7,042,387	2,772,321	52%	21%
2	2024/25	289,719	120,083	7,396,462	3,065,680	55%	23%
3	2025/26	293,174	119,879	7,484,667	3,060,486	56%	23%
4	2026/27	296,629	119,879	7,572,867	3,060,486	56%	23%
5	2027/28	297,801	120,201	7,602,795	3,068,712	57%	23%
6	2028/29	296,731	119,879	7,575,459	3,060,486	57%	23%
7	2029/30	296,331	119,879	7,565,248	3,060,486	57%	23%

b) Please see Table 2. In addition to the U.S. supply provided in Table 1, total supply transported through U.S. also includes gas sourced in Alberta and transported on GLGT to Dawn and on TCPL/CTHI/CPMI to the Union MDA and Union SSMDA.

[1] 2023/24 data is from the 2024 Annual Update (EB-2024-0067, Table 5). For years 2024/25 and beyond, figures are from the corrected 5-Year Gas Supply Plan (Table 10).

Table 2

Percentage of Total Supply Transported Through U.S.

Line No.	Particulars	% (a)
1	2023/24	55%
2	2024/25	57%
3	2025/26	58%
4	2026/27	59%
5	2027/28	60%
6	2028/29	60%
7	2029/30	60%

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Appendix A, Market Outlook, pp. 9-13

Preamble:

Enbridge indicates that capacity on the TCPL mainline is scarce. Environmental Defence seeks to examine where capacity bottlenecks are arising.

Question(s):

(a) Approximately 5-10 years ago, there was considerable capacity on the TC mainline. Please discuss what has changed and when that changed.

(b) Please provide a table showing for each year in the past 15 years (i) the available capacity for TC mainline deliveries to Ontario and (ii) the supply on the TC mainline contracted for Ontario deliveries.

(c) Is the lack of capacity for the TC mainline to bring gas into Ontario due to increased deliveries in Ontario or increased deliveries upstream of Ontario?

(d) What, if any capacity would be available on the segments of the TC mainline in Ontario assuming there was capacity on the segments of TC leading to the Ontario border. This question is intended to explore the degree to which the TC mainline limits are due to upstream bottlenecks.

(e) What quantity and percent of the gas purchased at or arriving at Dawn at some point flows through the TCPL mainline before passing into the United States via other routes, including the Northern Border Pipeline and Great Lakes Gas Transmission on the way to Dawn?

(f) Could contracts for delivery of gas at Dawn that originates from the WCSB and travels through the TC mainline and then via US pipelines for delivery at Dawn be switched to delivery via the TC mainline via long-haul? Please explain.

(g) Please provide a forecast of the capacity for incremental TC mainline deliveries to Ontario for each year in the gas supply plan term.

(h) If capacity were to come available on the TC mainline during the Plan term, would Enbridge contract for that supply (e.g. to avoid the potential for a Dawn-Parkway expansion to be needed). Please explain why or why not.

Response:

a-d), f), g)

Enbridge Gas does not have access to TransCanada Mainline (Mainline) system planning and capacity information and therefore cannot provide detail on constraints, availability of future capacity or forecast information. Enbridge Gas provides the following comments in an attempt to be responsive.

Over the past 5-10 years, flows on the Mainline have increased significantly and tolls have decreased to historical lows. Incremental contracting over this period has been driven by long-term, discounted services (Long-Term Fixed Price or LTFP) and discretionary services[1] that have increased revenues and contributed to rate riders that have reduced tolls. In addition, significant incremental contracting to export points on the Western Mainline (Emerson) and the Trans-Quebec Maritimes Pipeline (East Hereford)[2] has expanded capacity in these areas. Significant expansion in Ontario to serve domestic demands occurred in the 2015-2017 period, when Eastern shippers moved supply from Empress to Dawn, driven by enhanced diversity of supply, gas costs savings, enhanced liquidity at Dawn[3] and the risk of reliance on significant delivered services and peaking services[4]. In 2019, additional expansion occurred at the Maple Compression Station that added capacity to this constrained

[1] The National Energy Board's (now Canada Energy Regulator) RH-003-2011 decision granted TransCanada approval to set prices for its interruptible and short-term firm transportation services for purposes of maximizing total system revenues.
[2] July 5, 2024, Mainline Existing Capacity Open Season offered 315 TJ/d of incremental capacity on the Western Mainline, starting November 1, 2024.
East Hereford has added 0.34 Bcf/d of incremental capacity over the 2020-2024 period (June 1, 2025 1.20 Bcf/d less 0.86 Bcf/d on October 1, 2021, as per the CER's Pipeline Profile)
[3] Union Gas Brantford-Kirkwall/Parkway D Project (EB-2013-0074), OEB Decision and Order, January 30, 2014, p.22
[4] Enbridge Gas Distribution GTA Project (EB-2012-0451), OEB Decision and Order, January 30, 2014, p.38

area in Ontario[5]. Significant operational issues and maintenance activities on Great Lakes Gas Transmission[6] (which links Empress to demand markets in Canada and the United States) have also contributed to increased pressure on Mainline capacity.

A summary of current capacity available on the Mainline can be found at the following link:
https://www.tccustomerexpress.com/2861.html

Further information on Mainline and Trans-Quebec Maritimes history and capacity can be found at the Canada Energy Regulator's Mainline Profile website:
Canada Energy Regulator - TransCanada Mainline - Pipeline Profile
Canada Energy Regulatory - Trans Quebec Maritimes - Pipeline Profile

e) Enbridge Gas cannot answer this question on the basis that it does not track this information.

h) Enbridge Gas will evaluate all future open seasons relevant to meet demand requirements against other options available at the time, if any, and may contract based on the decision at that time.

[5] CER Application - Station 130 C5 Compressor Station Unit Addition
[6] Great Lakes Gas Transmission - Maintenance Reporting

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

2

Reference:

Section 6.3, p. 71

Preamble:

Certified Natural Gas ("CNG") made up roughly 4.5% of the total gas supply in 2023/24. Enbridge asserts that there are no plans to increase investments in CNG.

Question(s):

(a) Please confirm whether Enbridge plans to maintain the current level of CNG supply as part of its portfolio in the next six years

(b) Please provide a table listing the CNG certification options and the climate change criteria for each (e.g. GHG intensity).

(c) Please provide a table showing (i) the upstream emissions from non-CNG gas on average (tonnes CO_2e/m^3) and (ii) the maximum upstream emissions from CNG to qualify for each of the CNG certification schemes (tonnes CO_2e/m^3). We are attempting to get a concrete understanding of the environmental benefits of CNG certification options.

(d) For each of the CNG options, please express the cost as dollars per tonne of avoided CO_2e, with the comparator being the average embedded CO_2e emissions from gas. The difference will presumably arise due to avoided CO_2e arising from extraction and leaks.

(e) If Enbridge is procuring gas and has the option of choosing between gas certified under different certification labels, how will Enbridge choose between them when cost is not a factor?

(f) Over the past five years, has Enbridge referred to certified natural gas, sustainable natural gas, responsible natural gas, or other synonyms in its promotional materials? If yes, please provide a copy of said materials.

(g) Does Enbridge intend to refer to certified natural gas, sustainable natural gas, responsible natural gas, or other synonyms in its promotional materials (e.g. as being relevant to social or environmental responsibility)?

(h) Would Enbridge commit to refrain from citing CNG in its promotional materials?

(i) If Enbridge will not commit to (h), would it commit to only discuss CNG in promotional materials while also making reference to its limitations in equally large text (e.g. the lack of attributable GHG emissions reductions)?

Response:

a & e)

While Enbridge Gas procures certified natural gas as part of the gas supply commodity portfolio, the Company does not actively seek to procure such supply.[1] The Company accepts bids from suppliers offering certified natural gas volumes as part of its normal RFP processes and procures such volumes only when they are an economic option. As such, Enbridge Gas does not plan for procurement of a specified level of certified natural gas.

From a gas supply procurement perspective, Enbridge Gas has no strategic preference regarding certification labels.

b) A comparison of natural gas certification programs was conducted by ERM International Group Limited in 2023,[2] with a comparison of topic areas provided in Table 1 on page 5. Enbridge Gas notes that each program has unique and specific grading or scoring systems and while each program includes methane and GHG emissions as topic areas, the inclusion of methane or GHG intensity performance is voluntary under some programs (e.g. Project Canary).

[1] EB-2025-0065, p.71.
[2] ERM International Group Limited. 2023. Comparison of Natural Gas Certification Programs. Case Study

c) Certified natural gas volumes procured by Enbridge Gas to date have had Equitable Origin[3] and/or MiQ[4] certifications. The MiQ certification program has established six performance grades (A to F) which include a maximum methane intensity that natural gas producers must achieve to become certified. The Equitable Origin certification program prescribes a list of practices required for certification but does not provide explicit values for methane or GHG intensity performance.

d) Table 1 provides the methane intensity percentage (and equivalent units) for each MiQ certified grade. The "non-certified" methane intensity shown in Table 1 was derived by MiQ and Highwood in 2023 for natural gas producing basins located in the United States, which includes greater than 80 percent of US natural gas. To date, all of Enbridge Gas certified natural gas purchases have been MiQ certified[5] with approximately 98 percent of purchases achieving Grades B or A.

Table 1
Methane Intensity Percentage

Type of Natural Gas	Grade/ Reference	Methane Intensity (%)	Methane Intensity gCH_4/mmbtu (gCO_2e/MJ)
Non-certified	2021 US benchmark	1.0 average 0.49 min 4.68 max	175.4 (4.6) average 85.9 (2.3) min 820.8 (21.7) max
Certified	MiQ Grade A	0.05	8.8 (0.2)
	MiQ Grade B	0.1	17.5 (0.5)
	MiQ Grade C	0.2	35.1 (0.9)
	MiQ Grade D	0.5	87.7 (2.3)
	MIQ Grade E	1.0	175.4 (4.6)
	MiQ Grade F	2.0	350.8 (9.3)

Since Enbridge Gas's purchases of certified natural gas have not incurred a premium cost, the dollar per tonne CO_2e cost to reduce emissions is considered to be zero.

f) Yes, on one occasion Enbridge Gas referred to "*responsible natural gas*" over the past five years in its promotional materials (a press release):

[3] Equitable Origin. 2021. EO100TM Technical Supplement, EO100.1: Onshore Natural Gas and Light Oil Production. EO100 TechnicalSupplement Onshore Natural Gas and Light Oil Production - Version 2.0_Revised2024.docx
[4] MiQ. 2022. MiQ Standard for Methane Emissions Performance for Natural Gas Operations, Main Document – Onshore Production v1.0.0 miq.org/document/miq-standard-onshore/
[5] As discussed in the November 10, 2022, press release included in part f), Enbridge Gas purchased certified natural gas supply from EQT in 2022/2023 that was both MiQ and Equitable Origin certified.

1. Press Release, November 10, 2022 –
   Enbridge Gas partners with EQT Corporation to purchase and deliver responsibly sourced natural gas - Nov 10, 2022

g– i) No, Enbridge Gas has no immediate plans to include references to certified natural gas, sustainable natural gas, or responsible natural gas (or any synonyms of these) within its promotional materials. Despite this, Enbridge Gas does not commit to refrain from ever citing certified natural gas in any future promotional materials. However, should Enbridge Gas refer to certified natural gas in future promotional materials it may consider including some description of its associated benefits and limitations, as it deems appropriate and at its sole discretion.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.56, Tables 15 & 16 and
EB-2024-0067 Revised Transcript Stakeholder Conference, p.131-133

Preamble:

In past GSP Update proceedings, we have recommended that the quantification of service options provides data that allows a more fulsome comparison. We request the following information to allow the Board to consider additional data which may be of assistance.

Question(s):

Please show each step of the derivation to arrive at the Average Cost/Customer Impact for Options shown to the Union EDA.

Response:

Please see Attachment 1 for the detailed derivation of the Average Cost/Customer Impact associated with the referenced Union EDA supply/service options.

Union EDA Option Analysis Bill Impact Estimate

Heat Value 39.02

Line No.	Particulars (1)	Allocated Costs Commodity $(000) (a)	Allocated Costs Transportation $(000) (b)	Allocated Costs Total $(000) (c) = (a+b)	Volumes Sales Service (TJ) (d)	Volumes Sales Service & BT (TJ) (e)	Typical Residential Customer Impact Total Unit Rate ($/GJ) (f) = (a/d)+(b/e)	Total Unit Rate (cents/m^3) (g) = (f)* HV	Annual Bill Impact ($) (h) = (g)*2200/100	April 2025 QRAM Total Bill ($) (2) (i)	Bill Impact (%) (j) = (h/i)
	Union North East										
	Union EDA										
1	TC: Long-haul	140	1,024	1,164	30,775	41,449	0.029	0.1142	2.51	1,211.33	0.2%
2	TC: Short-haul via Dawn to Parkway	108	395	502	30,775	41,449	0.013	0.0508	1.12	1,211.33	0.1%
3	TC: Short-haul via Niagara	84	443	527	30,775	41,449	0.013	0.0524	1.15	1,211.33	0.1%
4	TC: Short-haul via Iroquois	232	162	394	30,775	41,449	0.011	0.0446	0.98	1,211.33	0.1%
5	Third Party	239	44	284	30,775	41,449	0.009	0.0345	0.76	1,211.33	0.1%

Notes:

(1) Bill impacts are for typical sales service residential customers consuming 2,200 m^3 annually. Estimated annual bill impacts are derived based on Union North East sales service volumes for the respective period.

(2) Bill impacts are based on Enbridge Gas's April 2025 QRAM (EB-2025-0078), excluding temporary price adjustments.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.56, Tables 15 & 16 and
EB-2024-0067 Revised Transcript Stakeholder Conference, p.131-133

Preamble:

In past GSP Update proceedings, we have recommended that the quantification of service options provides data that allows a more fulsome comparison. We request the following information to allow the Board to consider additional data which may be of assistance.

Question(s):

Please confirm that, to some degree, each of the options will require load balancing (e.g., storage, gas purchases, intra-Ontario transport, etc.) to ensure service through the winter months.

Response:

Enbridge Gas's load balancing needs are dynamic and unique for each delivery area and each season, depending on a variety of factors that are out of the Company's control, such as weather, customer consumption, and operating conditions. Certain supply/service options referenced may require load balancing to ensure service through the winter months depending upon the specific delivery area.

- TCPL Long-haul Transportation Capacity from Empress to Delivery Area –

  Enbridge Gas would plan to procure and transport gas supply year-round (100% load factor) on long-haul transportation capacity from Empress. To manage excess supply on any day, load balancing features such as diversion rights (to divert unneeded gas supply to Parkway, Dawn or another delivery area), and Storage Transportation Service (STS) injection/withdrawal rights would be used. Dawn storage is required as part of the gas supply portfolio to benefit from these load balancing features.

- TCPL Short-haul Transportation Capacity from Dawn/Parkway to Delivery Area –

  Enbridge Gas would plan to use incremental short-haul transportation capacity from Dawn/Parkway as load balancing capacity to meet design day demand. Gas supply would be procured at Dawn, upstream of Dawn, or withdrawn from Dawn storage, and transported to the delivery area on the short-haul transportation capacity.

- TCPL Short-haul Transportation Capacity from Niagara/Iroquois to Delivery Area –

  Enbridge Gas may plan to procure and transport gas supply year-round (100% load factor) on short-haul transportation capacity from Niagara or Iroquois. In that case, load balancing features such as diversion rights (to divert excess gas supply to Parkway or Dawn) and Dawn storage would be used. If Enbridge Gas did not flow supply year-round, the incremental short-haul transportation capacity would be used as load balancing capacity and gas supply would only be procured at Niagara/Iroquois as needed and transported to the delivery area.

- Third-Party Services (Peaking or Delivered Services to Delivery Area) –

  Third-party services provide short-term (10-day) optional service for the immediate delivery of the gas commodity to the delivery area. As a result, third-party peaking or delivered supply services are a load balancing service with no additional load balancing services needed.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.56, Tables 15 & 16 and
EB-2024-0067 Revised Transcript Stakeholder Conference, p.131-133

Preamble:

In past GSP Update proceedings, we have recommended that the quantification of service options provides data that allows a more fulsome comparison. We request the following information to allow the Board to consider additional data which may be of assistance.

Question(s):

In an Excel spreadsheet, please fill in the following table to break out the components of the annual bill impact in 2024 for customers in the CDA when the full annual unit costs of gas supply are considered. To ensure clarity, while storage may be recovered in delivery rates, please include it in this table.

Option	Provider	Unit Cost of Delivery to Ontario (Gas/Transport)	Load Balancing Transport (Ontario)	Seasonal Load Balancing (Storage/Purchases)	Total Annualized Gas Supply Cost
		($/GJ)	($/GJ)	($/GJ)	($/GJ)

Response:

Enbridge Gas does not believe the information sought by FRPO in the format requested for each of the supply/service options provides a comparable assessment of the alternatives.

Please see response at Exhibit I.1-FRPO-1 parts a) and b), for an explanation as to the nature of and details regarding the quantification of costs assessed as part of the annual cost (design day demand) and landed cost (annual average demand) analyses discussed in that Section of evidence, neither of which include load balancing costs (as those costs are dynamic and distinct for each delivery area and supply/service option, as described in response at Exhibit I.2-FRPO-3) or storage costs (as those costs are not variable). Accordingly, Enbridge Gas has not completed the Load Balancing Transport (Ontario), Seasonal Load Balancing (Storage/Purchases), and Total Annualized Gas Supply Cost columns as requested. The Unit Cost of Delivery to Ontario (Gas/Transport) unit rates requested can be found in response at Exhibit I.1-FRPO-1, Attachments 1 to 4, and in Attachment 1 to this response (for the Enbridge CDA).

As discussed in Appendix C of the Company's 5-Year Gas Supply Plan, Enbridge Gas includes an assessment of incremental load balancing impacts supporting incremental contracting decisions as part of its holistic analysis of supply/service options where a capacity shortfall has been identified and alternative supply/service options are actually available (e.g., the 2024/25 Enbridge CDA Shortfall). The approach in Appendix C includes a complete gas supply plan analysis of portfolio impacts to transportation, storage and commodity changes for each of the alternatives evaluated. Although storage costs are not impacted by incremental transportation contracting, the analysis in Appendix C includes consideration of changes in storage utilization for each of the alternatives evaluated.

Enbridge CDA Design Day Supply Option Analysis

Route	Point of Supply	Supply Cost $US/mmBtu	Unitized Demand Charge $US/mmBtu	Commodity Charge $US/mmBtu	Fuel Charge $US/mmBtu
TCPL: Long-haul	Empress	$ 10.23	$ 0.77	$ -	$ 0.43
TCPL: Short-haul via Dawn to Parkway	Dawn	$ 8.13	$ 0.19	$ 0.00	$ 0.06
TCPL: Short-haul direct from Dawn	Dawn	$ 8.13	$ 0.08	$ 0.00	$ 0.04
TCPL: Short-haul via Niagara	Niagara	$ 6.39	$ 0.14	$ -	$ 0.02
Third-Party	Iroquois	$ 17.63	$ 0.67	$ 0.08	
Foreign Exchange	$1 US =	1.3504 CDN		From Bank of Canada Closing Rate October 1, 2024	

		2024/25	2025/26	2026/27	2027/28	2028/29	Average Cost $US M/yr	Average Cost $CAD M/yr
Number of days		365	365	365	365	366		
Design Day Shortfall (GJ/d)		252,888	280,975	309,101	310,905	309,456		
TCPL: Long-haul	Demand - yr	71.4	79.3	87.2	87.7	87.6	82.64	105.77
	Supply - 4 days	10.3	11.5	12.6	12.7	12.7		
	Variable - 4 days	0.4	0.5	0.5	0.5	0.5		
		10.8	12.0	13.2	13.3	13.2	12.48	15.97
							95.12	121.74
TCPL: Short-haul via Dawn to Parkway	Demand - yr	17.9	19.9	21.9	22.0	21.9	20.71	26.51
	Supply - 4 days	8.2	9.1	10.0	10.1	10.1		
	Variable - 4 days	0.1	0.1	0.1	0.1	0.1		
		8.3	9.2	10.1	10.2	10.1	9.59	12.28
							30.30	38.79
TCPL: Short-haul direct from Dawn	Demand - yr	7.6	8.4	9.2	9.3	9.3	8.76	11.21
	Supply - 4 days	8.2	9.1	10.0	10.1	10.1		
	Variable - 4 days	0.0	0.1	0.1	0.1	0.1		
		8.3	9.2	10.1	10.2	10.1	9.57	12.25
							18.33	23.46
TCPL: Short-haul via Niagara	Demand - yr	12.6	14.0	15.4	15.5	15.5	14.61	18.70
	Supply - 4 days	6.5	7.2	7.9	7.9	7.9		
	Variable - 4 days	0.0	0.0	0.0	0.0	0.0		
		6.5	7.2	7.9	8.0	7.9	7.51	9.61
							22.11	28.30
Third-Party	Demand - 10 days	1.7	1.9	2.1	2.1	2.1	1.97	2.52
	Supply - 4 days	17.8	19.8	21.8	21.9	21.8		
	Variable - 4 days	0.1	0.1	0.1	0.1	0.1		
		17.9	19.9	21.9	22.0	21.9	20.72	26.52
							22.69	29.05

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.56, Tables 15 & 16 and
EB-2024-0067 Revised Transcript Stakeholder Conference, p.131-133

Preamble:

In past GSP Update proceedings, we have recommended that the quantification of service options provides data that allows a more fulsome comparison. We request the following information to allow the Board to consider additional data which may be of assistance.

Question(s):

Please provide the same determination of unit costs of Gas Supply for the:

a) EGD EDA
b) UNION NDA
c) UNION WDA

Response:

Please see response at Exhibit I.2-FRPO-4.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.5

Preamble:

EGI evidence states: ***Reliability and security of supply*** *– Characteristics of supply/service option reliability and security evaluated by Enbridge Gas include, but are not limited to: liquidity, nomination performance, delivery performance, transportation distance, service quality, system connectivity, and the* ***magnitude of existing third-party services*** *(e.g., peaking and delivered services) in the Company's portfolio.* ***(emphasis added)***

We would like to understand EGI's criteria of the magnitude of existing third-party services

Question(s):

Please provide an explanation of the magnitude of existing services.

a) Please describe the criteria that the company uses and how it applies in the effort to establish reliability and security of supply.

Response:

By "magnitude of existing third-party services" Enbridge Gas was referring to commercial services contracted in lieu of firm transportation capacity[1]. In such instances, there is increased risk of failure to deliver relative to firm transportation capacity, and while certain commercial assurances can be negotiated to financially

[1] Commercial services may not be supported by firm transportation capacity contracts held by the counterparty providing the service(s).

(partially) offset this risk, the Company may still be at risk of experiencing a system outage during peak winter weather conditions if supply is not delivered (as such risk is highest during extreme winter weather events). An example of such services referenced in the 5-Year Gas Supply Plan is peaking services, the nature and/or magnitude of which are also detailed in Tables 10 and 25 of Enbridge Gas's evidence and discussed in responses at Exhibit I.5-EP-2, Exhibit I.2-CCC-4 part a), Exhibit I.2-FRPO-26 part b), and Exhibit I.4-SEC-9 Attachment 1. As stated in the Company's 5-Year Gas Supply Plan,[2]

> Peaking supply arrangements source gas from third-party suppliers for firm delivery directly to Enbridge Gas's distribution system a few days per year (typically a maximum of 10 days) during the winter season, avoiding incremental transportation capacity. Peaking supplies trade at a premium to conventional supply, recognizing the magnitude of daily supply contracted and the likelihood that they are called upon during peak winter conditions (i.e., when market prices are typically highest).

a) As stated in the 5-Year Gas Supply Plan,

> Enbridge Gas's preferred planning strategy is to meet design day shortfalls using third party (peaking) services up to a maximum limit of 2% of design day demand for each delivery area. Once peaking services have been contracted to the preferred maximum by delivery area, Enbridge Gas will look to other alternatives to meet design day shortfall.[3]
> …
> Enbridge Gas uses 2% as a guideline for the amount of peaking services held within the portfolio of any delivery area to limit risk in the event that peaking services fail to deliver. In the event of a failure, Enbridge Gas expects to be able to manage the supply shortfall within the parameters of its firm transportation contracts, which accommodates up to 2% consumption above deliveries in a delivery area on a discretionary basis before incurring penalties.[4]

For these reasons, seeking to limit long-term reliance on peaking services based on the extent to which the Company can leverage alternative firm transportation services (e.g., TCPL Limited Balancing Agreement thresholds of 2% per delivery area) to avoid the impacts of a third-party service provider failing to deliver contracted supply is consistent with Enbridge Gas's gas supply planning principles and the OEB's Guiding Principles (i.e., reliability and security of supply).

[2] EB-2025-0065, Appendix B, p.3.
[3] EB-2025-0065, p.28.
[4] EB-2025-0065, p.10.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.16-18 including Footnotes 23 & 25

Preamble:

EGI evidence states: *The annual demand forecast underpinning the Plan was developed using the same methodologies as those utilized to establish the Company's OEB-approved annual demand forecast for the 2024 Rebasing proceeding.*

We would like to understand EGI's approach to developing its demand forecast

Question(s):

For the purposes of presenting this 5-year Gas Supply Plan:

a) Are the annual demand forecasts the same amounts as were filed at the outset of EB-2022-0200 or just the same methodologies? Please explain fully.
b) Please provide the monthly demand forecast underpinning the Gas Supply Plan.
    i) Please provide the monthly demand forecast arising from adjustments associated with Phase One Settlement proposal.
    ii) Using the monthly demand forecast in i), please provide the adjustments that arise from the ET adjustments noted in footnote 25 on page 17 and to the base average use forecast noted on page 18.

Response:

a) The annual demand forecast underpinning the gas supply plan used the same methodologies as filed in Phase 1 of the 2024 Rebasing Application[1]. The forecast was updated with the most recent actual data available up to 2023. Consequently, the amounts differ from those filed in Phase 1 of the 2024 Rebasing Application.

b) Please see Attachment 1.

i) Any applicable and relevant adjustments from the 2024 Rebasing Phase 1 Settlement Agreement[2] were already considered within the forecast of this gas supply plan.

ii) Please see response at Exhibit I.2-PP-2. Please note that the Energy Transition Adjustments are created at an annual level rather than monthly.

[1] EB-2022-0200.
[2] EB-2022-0200, Settlement Agreement, August 17, 2023.

Monthly Demand Forecast - 2024/25

Line No.	Particulars (TJ)	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Total 2024/25
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	41,180	61,462	71,581	62,574	54,460	31,681	16,794	8,202	6,882	6,986	8,581	23,117	393,499
2	Contract	6,664	6,664	6,664	6,664	6,664	6,664	6,664	6,664	6,664	6,664	6,664	6,664	79,968
3	Total EGD	47,844	68,126	78,245	69,238	61,124	38,345	23,458	14,866	13,546	13,650	15,245	29,781	473,467
	Union North West													
4	General Service	1,527	2,040	2,594	2,212	1,836	1,367	611	255	272	241	277	813	14,045
5	Contract	208	245	359	366	190	150	105	191	154	126	181	231	2,507
6	Total Union North West	1,735	2,286	2,952	2,579	2,026	1,517	716	446	425	367	458	1,044	16,552
	Union North East													
7	General Service	4,205	5,818	6,695	5,900	5,089	3,169	1,590	762	743	772	853	2,075	37,671
8	Contract	365	374	433	393	406	334	285	225	208	235	233	287	3,778
9	Total Union North East	4,570	6,192	7,128	6,293	5,495	3,502	1,875	987	951	1,007	1,087	2,363	41,449
	Union South													
10	General Service	18,874	25,207	29,421	27,370	23,177	15,148	7,200	4,668	4,370	4,427	4,657	9,240	173,757
11	Contract	5,778	5,390	6,931	6,379	6,679	5,070	4,488	3,673	3,286	3,556	4,271	5,148	60,646
12	Total Union South	24,652	30,597	36,351	33,749	29,856	20,217	11,688	8,341	7,655	7,983	8,927	14,387	234,403
13	Total Demand Forecast	78,801	107,201	124,676	111,859	98,502	63,581	37,737	24,639	22,579	23,006	25,717	47,575	765,871

Monthly Demand Forecast - 2025/26

Line No.	Particulars (TJ)	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Total 2025/26
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	40,961	61,111	71,165	62,216	54,155	31,523	16,733	8,197	6,888	6,991	8,574	23,015	391,530
2	Contract	6,576	6,576	6,576	6,576	6,576	6,576	6,576	6,576	6,576	6,576	6,576	6,576	78,910
3	Total EGD	47,536	67,687	77,741	68,792	60,731	38,099	23,309	14,773	13,463	13,567	15,150	29,591	470,440
	Union North West													
4	General Service	1,526	2,042	2,599	2,216	1,839	1,366	606	249	266	235	272	809	14,025
5	Contract	208	245	359	366	190	150	105	191	154	126	181	231	2,505
6	Total Union North West	1,735	2,287	2,958	2,582	2,028	1,515	711	440	419	361	453	1,040	16,530
	Union North East													
7	General Service	4,201	5,820	6,708	5,908	5,093	3,164	1,577	744	727	754	836	2,065	37,599
8	Contract	365	374	432	392	405	333	284	225	208	235	233	287	3,772
9	Total Union North East	4,566	6,193	7,141	6,301	5,498	3,498	1,861	970	934	989	1,069	2,352	41,371
	Union South													
10	General Service	18,908	25,274	29,517	27,446	23,229	15,155	7,163	4,617	4,318	4,376	4,606	9,211	173,820
11	Contract	5,828	5,434	6,908	6,358	6,657	5,046	4,463	3,649	3,276	3,547	4,262	5,139	60,567
12	Total Union South	24,735	30,708	36,426	33,804	29,886	20,201	11,626	8,266	7,594	7,923	8,867	14,350	234,386
13	Total Demand Forecast	78,572	106,875	124,265	111,479	98,143	63,313	37,507	24,449	22,411	22,840	25,539	47,333	762,727

Monthly Demand Forecast - 2026/27

Line No.	Particulars (TJ)	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Total 2026/27
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	40,813	61,004	71,078	62,111	54,034	31,357	16,537	7,984	6,671	6,775	8,362	22,831	389,558
2	Contract	6,817	6,817	6,817	6,817	6,817	6,817	6,817	6,817	6,817	6,817	6,817	6,817	81,809
3	Total EGD	47,631	67,821	77,895	68,929	60,851	38,174	23,355	14,801	13,489	13,592	15,179	29,649	471,367
	Union North West													
4	General Service	1,527	2,045	2,603	2,218	1,839	1,363	601	243	260	230	266	805	14,000
5	Contract	208	245	358	366	189	149	105	191	154	126	181	231	2,504
6	Total Union North West	1,735	2,290	2,961	2,584	2,029	1,513	706	434	413	356	447	1,036	16,504
	Union North East													
7	General Service	4,200	5,827	6,715	5,911	5,093	3,158	1,564	728	710	737	820	2,054	37,516
8	Contract	364	373	432	392	405	332	283	225	207	234	232	286	3,767
9	Total Union North East	4,565	6,200	7,147	6,303	5,497	3,491	1,847	952	917	971	1,052	2,340	41,283
	Union South													
10	General Service	18,933	25,338	29,585	27,502	23,265	15,155	7,126	4,570	4,270	4,329	4,559	9,181	173,814
11	Contract	5,820	5,427	6,997	6,437	6,743	5,128	4,548	3,731	3,362	3,632	4,343	5,225	61,393
12	Total Union South	24,753	30,765	36,582	33,939	30,008	20,283	11,675	8,301	7,632	7,961	8,902	14,406	235,207
13	Total Demand Forecast	78,683	107,076	124,586	111,755	98,386	63,461	37,583	24,489	22,451	22,881	25,580	47,431	764,361

Monthly Demand Forecast - 2027/28

Line No.	Particulars (TJ)	Nov-27	Dec-27	Jan-28	Feb-28	Mar-28	Apr-28	May-28	Jun-28	Jul-28	Aug-28	Sep-28	Oct-28	Total 2027/28
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	40,569	60,633	70,646	61,735	53,708	31,172	16,445	7,945	6,642	6,745	8,321	22,699	387,260
2	Contract	6,768	6,768	6,768	6,768	6,768	6,768	6,768	6,768	6,768	6,768	6,768	6,768	81,214
3	Total EGD	47,336	67,401	77,414	68,503	60,476	37,940	23,213	14,713	13,410	13,513	15,088	29,467	468,474
	Union North West													
4	General Service	1,526	2,047	2,606	2,220	1,838	1,360	596	237	254	224	261	800	13,969
5	Contract	208	245	358	366	189	149	104	191	154	126	181	231	2,502
6	Total Union North West	1,734	2,292	2,964	2,586	2,027	1,509	701	428	407	350	441	1,031	16,471
	Union North East													
7	General Service	4,198	5,830	6,722	5,914	5,087	3,149	1,550	711	693	720	803	2,041	37,416
8	Contract	364	373	431	391	404	332	282	225	207	234	232	286	3,761
9	Total Union North East	4,562	6,203	7,153	6,305	5,491	3,480	1,832	935	900	954	1,035	2,326	41,177
	Union South													
10	General Service	18,946	25,384	29,653	27,557	23,277	15,140	7,083	4,520	4,219	4,279	4,508	9,143	173,710
11	Contract	5,903	5,513	6,987	6,426	6,733	5,118	4,538	3,720	3,351	3,622	4,333	5,214	61,458
12	Total Union South	24,849	30,897	36,640	33,983	30,010	20,258	11,621	8,240	7,570	7,901	8,841	14,357	235,168
13	Total Demand Forecast	78,481	106,794	124,172	111,377	98,003	63,187	37,367	24,317	22,287	22,718	25,406	47,182	761,290

Monthly Demand Forecast - 2028/29

Line No.	Particulars (TJ)	Nov-28	Dec-28	Jan-29	Feb-29	Mar-29	Apr-29	May-29	Jun-29	Jul-29	Aug-29	Sep-29	Oct-29	Total 2028/29
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	40,242	60,146	70,080	61,241	53,278	30,922	16,313	7,882	6,590	6,694	8,254	22,517	384,159
2	Contract	6,718	6,718	6,718	6,718	6,718	6,718	6,718	6,718	6,718	6,718	6,718	6,718	80,618
3	Total EGD	46,960	66,864	76,798	67,959	59,996	37,640	23,031	14,600	13,308	13,412	14,973	29,235	464,777
	Union North West													
4	General Service	1,523	2,044	2,604	2,217	1,835	1,354	591	232	248	219	255	795	13,915
5	Contract	208	245	358	365	189	149	104	191	154	126	181	231	2,500
6	Total Union North West	1,730	2,289	2,962	2,583	2,024	1,503	695	423	401	345	436	1,026	16,415
	Union North East													
7	General Service	4,185	5,820	6,714	5,904	5,076	3,136	1,534	694	676	703	786	2,026	37,255
8	Contract	364	373	431	391	403	331	282	224	207	234	232	285	3,756
9	Total Union North East	4,549	6,193	7,145	6,295	5,479	3,467	1,816	918	883	936	1,018	2,311	41,010
	Union South													
10	General Service	18,921	25,379	29,659	27,554	23,264	15,109	7,034	4,466	4,164	4,226	4,454	9,096	173,325
11	Contract	5,892	5,503	6,977	6,416	6,723	5,107	4,528	3,710	3,341	3,611	4,323	5,204	61,334
12	Total Union South	24,813	30,882	36,636	33,970	29,986	20,216	11,562	8,176	7,505	7,837	8,777	14,300	234,659
13	Total Demand Forecast	78,053	106,228	123,541	110,806	97,484	62,827	37,103	24,117	22,098	22,530	25,203	46,871	756,861

Monthly Demand Forecast - 2029/30

Line No.	Particulars (TJ)	Nov-29	Dec-29	Jan-30	Feb-30	Mar-30	Apr-30	May-30	Jun-30	Jul-30	Aug-30	Sep-30	Oct-30	Total 2029/30
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	EGD													
1	General Service	39,910	59,651	69,505	60,738	52,840	30,668	16,179	7,817	6,537	6,641	8,186	22,330	381,002
2	Contract	6,669	6,669	6,669	6,669	6,669	6,669	6,669	6,669	6,669	6,669	6,669	6,669	80,022
3	Total EGD	46,578	66,320	76,174	67,406	59,509	37,336	22,847	14,485	13,206	13,309	14,855	28,999	461,024
	Union North West													
4	General Service	1,519	2,041	2,598	2,211	1,829	1,348	585	226	242	214	250	789	13,851
5	Contract	208	245	358	365	189	149	104	191	154	126	181	231	2,498
6	Total Union North West	1,727	2,285	2,956	2,577	2,018	1,496	688	417	395	340	430	1,019	16,349
	Union North East													
7	General Service	4,173	5,810	6,697	5,887	5,058	3,120	1,518	678	660	686	769	2,010	37,065
8	Contract	363	372	430	390	402	330	281	224	207	233	231	285	3,750
9	Total Union North East	4,536	6,182	7,128	6,277	5,461	3,450	1,799	902	867	919	1,001	2,295	40,816
	Union South													
10	General Service	18,896	25,375	29,629	27,518	23,222	15,059	6,976	4,407	4,104	4,167	4,394	9,037	172,783
11	Contract	5,882	5,492	6,966	6,406	6,712	5,097	4,517	3,700	3,331	3,601	4,312	5,194	61,210
12	Total Union South	24,778	30,867	36,595	33,923	29,934	20,156	11,493	8,107	7,435	7,768	8,707	14,231	233,993
13	Total Demand Forecast	77,619	105,654	122,853	110,183	96,921	62,439	36,827	23,910	21,902	22,336	24,992	46,543	752,182

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.19

Preamble:

EGI evidence states: *By contrast, contract market demand is forecast to remain relatively stable, increasing slightly for the EGD and Union South rate zones due to customer growth*

We would like to understand better the forecasting process for contract market demand.

Question(s):

Has EGI made any adjustments in contract market demand as a result of US tariffs imposed on Ontario products?

a) If not, how does EGI generally foresee the effects of 35% tariffs if they remain at that level?

Response:

Please see response at Exhibit I.2-STAFF-3.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.23-24, Table 3 and Footnotes 32-36

Preamble:

We would like to understand better the forecasting process for Delivery Area Design Day Demands described in the Phase One evidence as noted in Footnoted 32.

Question(s):

Using EGD EDA (Ottawa), please show the development of the Design Day demand, applying the descriptions under Firm Customer Demand including the footnotes.

a) Please ensure that the development shows:
   i) Use of 47.5 HDDw with interruptibles off and the lower HDDw (historically 35) with interruptibles on.
   ii) Use of gate station flows to account for diversity (footnote 33)
   iii) Use of general service demand divided by the number of general service customers (footnote 34)
   iv) Use of contract customer demand reservation (footnote 35)
   v) New customer demand (Forecast Changes & footnote 36)

Response:

a) Please see Table 1 which is presented over the next four pages (pages 3 to 6).

   i) The design day demand for the Gas Supply Plan is the firm demand calculated using 47.5 HDDw with interruptible demand curtailed. A lower HDDw is not used with interruptible demand on in gas supply planning.

   ii) The use of Gate Station actual measured volumes to account for diversity of demand is shown in Table 1, footnote 2.

   iii) The general service demand divided by the number of general service customers is called the use per customer. The factor, called the use per customer factor is shown in Table 1, line 5, and is generated using historic use per customer trends.

   iv) The use of contract customer demand reservation is not required for any of the EGD EDA firm customers. Only one power generation customer that has 100% interruptible contract demand has a demand reservation; however this demand is curtailed on the design day and not included in the firm demand in the gas supply plan.

   v) New customer demand for general service customers is shown in Table 1, line 10. The changes to the contract rate customer demand are shown in Table 1, line 15, 16 and 20.

Table 1
EGD EDA 2024/25 Design Day Demand Development

Line No.	Description	Demand (GJ/d)	Comments
	(a)	(b)	(c)
	Base Demand Calculation		
1	Total[1] Base Demand[2] from Winter 2023/24 actual[3]	725,621	
2	Total[4] Contract Base Demand[5] from Winter 2023/24 actual[6]	127,621	
3	General Service Base Demand	598,000	Line 1 minus Line 2

[1] Derived from the linear regression analysis of the total volumetric demand from city gate station measurement data and weather data in the form of HDDw as stated in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, a-f).
[2] The daily demand used in the Enbridge EDA delivery area linear regression analysis are obtained from daily measurement records from the following city gate stations (TCPL tap locations): Dale, Campbellford, Leeds, Brockville, Elizabethtown, Summerstown, Lancaster, Metcalfe, Ottawa, Kemptville, Richmond, Haley, Petawawa, Chalk River and Deep River.
[3] The linear regression analysis uses Ottawa Design Day HDDw of 47.5.
[4] Firm and interruptible demand.
[5] The daily demand used in the EDA delivery area linear regression for contract customers are obtained from the customers station measurement records for contract rate customers within the Enbridge EDA as stated in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, a)-f), h-i-iii).
[6] The linear regression analyses use Ottawa Design Day HDDw of 47.5.

Table 1 (Continued)
EGD EDA 2024/25 Design Day Demand Development

Line No.	Description	Demand (GJ/d)	Comments
	(a)	(b)	(c)
	General Service Demand Calculation		
4	General Service Base Demand	598,000	Restate Line 3
5	Use Per Customer Factor[7] (UPCF)	1.025365	Use EGD EDA UPCF
6	General Service Base Demand with UPCF Adjustment	613,168	Line 4 multiplied by Line 5
7	Declining Use Per Customer Factor[8] (dUPCF)	0.995821	Use Winter 2024/25 dUPCF
8	General Service Base Demand with dUPCF Adjustment	610,606	Line 6 multiplied by Line 5
9	W2024/25 Egress Volume[9]	-518	
10	W2024/25 General Service Growth Volume[10]	5,446	
11	W2024/25 Total Forecast General Service Demand	615,534	Summation of Lines 8, 9, and 10

[7] The use per customer factor is as stated at EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, g iii) and EB-2025-0065, p.23.
[8] The declining use per customer factor is as stated at EB-2020-0091, 2025-2034 Asset Management Plan Addendum, Section 4.5.
[9] EB-2025-0065, p.17.
[10] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).

Table 1 (Continued)
EGD EDA 2024/25 Design Day Demand Development

Line No.	Description	Demand (GJ/d)	Comments
	(a)	(b)	(c)
	Contract Rate Demand Calculation		
12	Total Contract Base Demand	127,621	Restate Line 2
13	Firm[11] Contract Rate Demand[12]	107,859	
14	Interruptible[13] Contract Rate Demand[14]	19,762	Line 12 minus Line 13
15	W2024/25 Firm Contract Demand Forecast Volume[15]	-355	
16	W2024/25 Interruptible Contract Demand Forecast Volume[16]	0	
17	W2024/25 Total Firm Forecast Contract Rate Demand	107,504	Line 13 plus Line 15
18	W2024/25 Total Interruptible Forecast Contract Rate Demand	19,762	Line 14 plus Line 16

[11] For contract rate customers with both firm and interruptible demand, firm demand will be assigned based on customers firm Contract Demand per their contract. Interruptible demand will be any remaining demand above the firm Contract Demand.
[12] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, h-i-iii).
[13] For contract rate customers with both firm and interruptible demand, firm demand will be assigned based on customers firm Contract Demand per their contract. Interruptible demand will be any remaining demand above the firm Contract Demand.
[14] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, h-i-iv).
[15] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).
[16] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, i).

Table 1 (Continued)
EGD EDA 2024/25 Design Day Demand Development

Line No.	Description	Demand (GJ/d)	Comments
	(a)	(b)	(c)
	Total Design Day Demand Calculation		
19	W2024/25 Total Forecast General Service Demand	615,534	Restate Line 11
20	W2024/25 Total Firm Forecast Contract Demand	107,504	Restate Line 17
21	Total Design Day Demand[17]	723,038[18]	Line 19 plus Line 20

[17] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, EB-2025-0065, p.25.
[18] Interruptible Contract Rate Demand is not included in the Total Design Day Demand.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.25, Table 4
EB-2023-0072 Update, p.36-37; EB-2024-0067 2024 Update, p.48, Table 8
& EB-2020-0091 EGI's Asset Management Plan (2025-2034), Section 4.5

Preamble:

The update from 2023 EGI evidence states: *Since the 5-Year Plan was filed, there has been no change in options to serve and no material differences in the evaluation matrix, therefore the preferred strategy is still to procure a third-party service in the near term and to evaluate transportation options to manage future peak day growth. EGI will continue to monitor any shortfall positions and make decisions using the best available information at that time, which may include purchasing transportation capacity that may be available from time to time.*

We would like to understand better the development of the Design Day Demand Forecast.

Net Demand (TJ/d)	23/24	24/25	25/26
EGD CDA	3,378	3,389	3,400
EGD EDA	723	729	736
TOTAL EGD	4,101	4,118	4,136

Question(s):

Please confirm that the above table represents the Net Demand for the respective EGD Delivery Areas as evidenced in Table 8 of the 2024 Update.

a) Please provide a reconciliation describing the major drivers of the difference of 200 TJ/day between the Demand in Table 4 in this Plan and the previous year's update.

   i) We understand that curtailment likely accounts for some of the difference but was there any methodological change between the 2024 Update and the 2025 plan beyond presentation?

b) What drivers contribute to a reduction in forecasted peak day starting after 2027/28 for EGD CDA?

   i) Do these drivers impact EGD EDA? Please explain.

c) Do the design day demands reflect the ET adjustments referenced as being provided in EGI's Asset Management Plan (2025-2034) filed as EB-2020-0091, November 8, 2024, Section 4.5?

   i) If not, why not?

Response:

Confirmed. The information in the table was provided at EB-2024-0067, page 49, Table 8, line 3.

a) Enbridge Gas has assumed the difference of 200 TJ/d means the difference between the 2023/24 design day demand of 4,101 TJ/d compared to the 2024/25 design day demand of 4,301 TJ/d provided in the 5-Year Gas Supply Plan (GSP), page 24, Table 4, column a, line 3.

   The difference between the design day demand in EB-2024-0067 and the 5-Year GSP is the result of the following:

   - The design day demand was developed using different methodologies and design day HDDw.
     i. The design day demand forecast in EB-2024-0067 was prepared in 2023 using the methodologies[1] in place prior to completion of the 2024 Rebasing Phase 1 Settlement Agreement[2] and the 2024 Rebasing Phase 1 Decision[3].

[1] Probabilistic method, 1 in 5 year recurrence interval (without windspeed adjustment) as described in EB-2022-0200, Exhibit 4, Tab, 2 Schedule 3, paragraph 6 and section 2.
[2] EB-2022-0200, Settlement Agreement, August 17, 2023.
[3] EB-2022-0200, OEB Decision and Order, December 21, 2023.

ii. The design day demand forecast in the 5-Year GSP was prepared in 2024 using methodologies as part of the 2024 Rebasing Phase 1 Settlement Agreement[4][5]. This 5-Year GSP is the first application where the harmonized methodology was used to develop the design day demand.

- The design day demands were completed in different budget cycle years. EB-2024-0067 was prepared in 2023 while the 5-Year GSP was prepared in 2024.

- The design day demands are based on different forecast years. EB-2024-0067 was W2022/23 while the 5-Year GSP was W2023/24.

i) Please see response at part a) for methodology changes explanation and please see response at Exhibit I.6-PP-25 for explanation on curtailment.

b-c) The design day demand forecast reflects the Energy Transition Adjustments (the Adjustments) outlined in the 2025 to 2034 Asset Management Plan[6]. The Adjustments are applied to general service customers in all rate zones, including EGD CDA and EGD EDA.

For the EGD CDA, the projected energy usage reductions are greater than the forecasted system growth, leading to an overall decrease in design day demand during the forecast period. For the EGD EDA, the projected energy usage reductions are smaller than the system growth, leading to a reduced but still increasing design day demand during the forecast period.

The specific drivers contributing to a reduction in forecast design day demand are attributable to existing customer egress, declining design day demand per customer, and reductions in new customer attachments over time. In addition, there are reductions in contract rate customer demand due to DSM.

[4] EB-2022-0200, Settlement Agreement, August 17, 2023.
[5] Set Temperature Method, as described in EB-2022-0200, Exhibit 4, Tab, 2 Schedule 3.
[6] EB-2020-0091.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.26 & p.27, Table 5

Preamble:

EGI evidence states: *Forecast shortfalls are monitored and re-assessed annually. However, the Plan does not include any excess assets; only those necessary to meet firm design day requirements*

We would like to understand more about this annual re-assessment.

Question(s):

Please provide a summary of the annual re-assessments for each of the last 5 years.

a) If not included in the summary, please provide the criteria used to determine that the Plan does not include any excess assets.

Response:

a) The statement referenced in the preamble refers to the updated (or re-assessed) 5-year forecast of design day position that is filed each year with the gas supply plan Annual Update.[1] On an annual basis for the upcoming gas year, Enbridge Gas updates the design day position by delivery area and contracts for any design day shortfall. The term ‘re-assess’ refers to the process of updating the calculation of

[1] The design day position summary for the previous five years can be found within the gas supply plan Annual Update at the following OEB docket numbers: 2020 (EB-2020-0135); 2021 (EB-2021-0004); 2022 (EB-2022-0072); 2023 (EB-2023-0072); and 2024 (EB-2024-0067).

design day position annually so that Enbridge Gas is contracting on the basis of the most recent information available for the upcoming gas year.

As part of the annual update of the design day position, Enbridge Gas reviews each delivery area design day demand and current supply, ensuring that supply does not exceed demand and excess assets are not included in the plan.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.26 & p.27, Table 5

Preamble:

EGI evidence states: *Forecast shortfalls are monitored and re-assessed annually. However, the Plan does not include any excess assets; only those necessary to meet firm design day requirements*

We would like to understand more about this annual re-assessment.

Question(s):

Please expand the information in Table 5 (using 3 separate tables for display purposes):

a) In one table for the EGD CDA, separate the CDA between the delivery areas that serve Toronto and Niagara adding:
   i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
   ii) Specify the amount of M12 used.
   iii) Provide the components of rights used to meet the supply shortfall (i.e., curtailment, specific new contract paths from section 5.2 and quantities, etc.)
b) In the second table, present the Enbridge EDA and the Union EDA adding:
   i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
   ii) Specify the amount of M12 used.
   iii) Provide the components of rights used to meet the supply shortfall (i.e., curtailment, specific new contract paths from section 5.2 and quantities, etc.)

c) In a third table, present the remaining Union North delivery areas adding:
   i) Under each of the TCPL service types, list the specific firm delivery contracts and quantities used for each of Long-haul, Short-haul and STS.
   ii) Specify the amount of M12 used.

Response:

a) Please see Attachment 1. Enbridge Gas notes that the Enbridge CDA is a single delivery area and is not able to separate certain supply arrangements as requested. Where possible, Enbridge Gas has identified demand and supply applicable to the EGD Central and EGD Niagara regions of the Enbridge CDA.

b) Please see Attachment 2.

c) Please see Attachment 3.

Enbridge CDA 2024/25 Design Day Position

Line No.	Particulars (TJ/d)	Enbridge CDA (a)
	Demand	
	Design Day Demand	
1	EGD Central	3,293.7
2	EGD Niagara	284.6
3	Total EGD CDA Demand	3,578.3
	Supply	
	Delivered Supply	
4	Crowland storage withdrawal (1)	27.2
5	Niagara exchange (local production) (1)	3.0
6	Direct purchase customer supply (2)	25.2
	Enbridge Gas	
7	Dawn Parkway System - Parkway Suction (3)	2,194.0
	TCPL Long-Haul	
8	LTFP NBJ/NBJ to Enbridge CDA, expiring December 31, 2030	5.0
	TCPL Short-Haul	
9	Niagara Falls to Enbridge Parkway CDA, expiring October 31, 2030	76.6
10	Chippawa to Enbridge Parkway CDA, expiring October 31, 2030	123.4
11	Dawn to Enbridge CDA, expiring October 31, 2026	149.8
12	Parkway to Victoria Square, expiring October 31, 2026 (3)	85.0
13	Parkway to Enbridge CDA, expiring October 31, 2026 (3)	0.6
14	Parkway to Enbridge CDA, expiring October 31, 2032 (3)	158.0
15	Parkway to Enbridge CDA, expiring October 31, 2034 (3)	75.0
16	Parkway to Enbridge CDA, expiring October 31, 2036 (3)	100.0
17	Parkway to Enbridge CDA, expiring October 31, 2027 (3)	18.9
	TCPL STS	
18	STS - Parkway, expiring October 31, 2026 (3)	283.9
19	Total Supply	3,325.5
20	Supply Excess / (Shortfall) (line 19 - line 3)	(252.9)
	Incremental Supply	
21	TCPL Empress to Enbridge CDA	34.5
22	TCPL Niagara Falls to Enbridge CDA (Third-Party Assignment)	121.1
23	Peaking	97.3
24	Total Incremental Peak Day Supply	252.9
25	Supply Shortfall after Incremental Supply (line 20 + line 24)	-

Notes:

(1) Supply delivered within the Niagara region.

(2) Supply delivered within the Central region.

(3) Total Dawn Parkway capacity is 2,915.3 TJ/d, including the TCPL short-haul paths that require Dawn Parkway capacity.

Enbridge EDA/Union EDA 2024/25 Design Day Position

Line No.	Particulars (TJ/d)	Enbridge EDA	Union EDA
		(a)	(b)
	Demand		
1	Design Day Demand	723.0	191.7
	Supply		
	Enbridge Gas		
2	Dawn Parkway System - Parkway Suction (1)	-	-
	TCPL Long-Haul		
3	LTFP NBJ, expiring December 31, 2030	260.0	-
4	Empress, expiring October 31, 2026	-	1.0
5	Empress, expiring October 31, 2027	-	4.0
	TCPL Short Haul		
6	Dawn to Delivery Area, expiring October 31, 2026	114.0	-
7	Dawn to Iroquois, October 31, 2026	40.0	-
8	Parkway to Delivery Area, expiring October 31, 2026 (1)	-	35.0
9	Parkway to Delivery Area, expiring October 31, 2031 (1)	170.0	109.3
10	Parkway to Delivery Area, expiring October 31, 2032 (1)	19.1	5.0
11	Parkway to Delivery Area, expiring October 31, 2033 (1)	-	9.1
12	Parkway to Delivery Area, expiring October 31, 2036 (1)	25.0	-
	TCPL STS		
13	STS - Parkway, expiring October 31, 2026 (1)	80.6	26.4
14	Total Supply	708.7	189.7
15	Supply Excess / (Shortfall) (line 13 - line 1)	(14.3)	(1.9)
	Incremental Supply		
16	Peaking	14.3	1.9
17	Total Incremental Peak Day Supply	14.3	1.9
18	Supply Shortfall after Incremental Supply (line 14 + line 16)	-	-

Notes:

(1) Total Dawn Parkway capacity is 294.7 TJ/d and 184.7 TJ/d, for the Enbridge EDA and Union EDA, respectively, including the TCPL short-haul paths that require Dawn Parkway capacity.

Union North Delivery Areas 2024/25 Design Day Position

Line No.	Particulars (TJ/d)	Union MDA	Union SSMDA	Union WDA	Union NCDA	Union NDA
		(a)	(b)	(c)	(d)	(e)
	Demand					
1	Design Day Demand	5.6	42.0	84.8	50.6	179.3
	Supply					
	Enbridge Gas					
2	Dawn Parkway System - Parkway Suction (1)	-	-	-	-	-
	TCPL Long-Haul					
3	Empress to Delivery Area, expiring October 31, 2026 (1)	5.6	20.9	54.8	1.0	2.1
	TCPL Short-Haul					
4	Parkway to Delivery Area, expiring October 31, 2031 (2)	-	-	-	1.1	126.6
5	Parkway to Delivery Area, expiring October 31, 2032 (2)	-	-	-	2.9	-
6	Parkway to Delivery Area, expiring October 31, 2033 (2)	-	-	-	7.8	-
	TCPL STS					
7	STS - Dawn/Parkway, expiring October 31, 2026 (2) (3)	-	21.0	30.0	37.8	39.7
8	Total Supply	5.6	42.0	84.8	50.6	168.4
9	Supply Excess / (Shortfall) (line 8 - line 1)	-	-	-	-	(10.8)
	Incremental Supply					
10	Hagar LNG	-	-	-	-	10.8
11	Total Incremental Peak Day Supply	-	-	-	-	10.8
12	Supply Shortfall after Incremental Supply (line 9 + line 11)	-	-	-	-	-

Notes:

(1) Contracted capacity has been reduced by customer assignments of 2.0 TJ/d Union NDA, 0.4 TJ/d Union NDA, and 0.7 TJ/d Union SSMDA.

(2) Total Dawn Parkway capacity is 245.9 TJ/d. STS Withdrawals for the Union SSMDA are directly from Dawn and do not require Dawn to Parkway capacity.

(3) Union NDA STS withdrawals are less than contracted volume and contribute to STS pooling.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.26 & p.27, Table 5

Preamble:

EGI evidence states: *Forecast shortfalls are monitored and re-assessed annually. However, the Plan does not include any excess assets; only those necessary to meet firm design day requirements*

We would like to understand more about this annual re-assessment.

Question(s):

Has EGI merged any of its TCPL contracts to the TCPL Eastern Delivery Area or optimized its STS contracts to reduce costs and UFG? Please describe what has been done and what limitations EGI must overcome to reduce ratepayer cost.

Response:

No. There are no optimization opportunities related to the TCPL contracts serving the Enbridge EDA and Union EDA, as each delivery area is served by distinct TCPL transportation capacities with unique toll structures, despite being in a similar geographic region of Ontario. These capacities are not interchangeable, and the service contracts held by Enbridge Gas are specific to each of these unique delivery areas only. As such, they cannot be managed on an aggregated basis. Further, long-haul TCPL Mainline transportation capacity used to serve these delivery areas is fully (100%) utilized, so merging them would not provide any utilization-related benefits. Finally, Enbridge Gas is not aware of any UFG-related benefits that might result from merging TCPL contracts for these delivery areas.

Enbridge Gas maintains a portfolio of transportation services from TCPL that enables the Company to meet design day requirements across all delivery areas, including firm transportation (FT) service, storage transportation service (STS), and enhanced market balancing (EMB) service. In the normal course of managing this portfolio, Enbridge Gas generally seeks to optimize such services/contracts to reduce costs or to otherwise benefit ratepayers.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.29

Preamble:

EGI evidence states: *A combination of energy transition-related factors has resulted in reductions to planned expansions of transportation capacity across North America despite demand growth in many regions, exacerbating transportation capacity scarcity on many paths upstream of Enbridge Gas's systems. Recognizing these conditions, transportation capacity providers are increasingly requesting higher tolls and longer-term contracts to secure existing capacity*

Question(s):

Please differentiate between US and Canadian providers (specifically TCPL) in the last sentence. Please explain fully.

Response:

As explained in the 5-Year Gas Supply Plan,[1] on CER regulated (inter-provincial) pipelines where firm transportation tolls are fixed, shippers compete for capacity by bidding for extended contract terms. By contrast, on FERC regulated (inter-state) pipelines, where a maximum toll is set but negotiated rates are permitted, shippers compete for capacity by bidding for both higher tolls and extended contract terms.

In the case of transportation capacity (new or existing) on TCPL being offered to the market via open season, since firm transportation tolls are fixed, the only variable that bidders can adjust to improve the overall value to TransCanada Energy (TCE) of their bid is the length of contract term. Transportation tolls on TCPL generally depend on the

[1] EB-2025-0065, p.30.

total length of the transportation path shipped, the greater the distance the higher the toll. Therefore, depending upon the nature of TCPL capacity (receipt and delivery points) offered in open seasons by TCE, potential shippers are not only competing against other shippers on like transportation paths, but also against other shippers on longer transportation paths. As TCE evaluates bids for capacity based on their total value to the company (i.e., toll × volume × contract term), shippers for shorter distance (and lower toll) paths must increase the contract term of their bids commensurately to compete against longer distance (and higher toll) shippers for the same volumes. These calculations and estimations are made by shippers absent knowledge of the demand for various transportation path at the time of the open season.

Please see the 5-Year Gas Supply Plan for additional examples of recent TCPL open seasons wherein participants bid and were awarded capacity for extended contract terms (e.g., 26 years).[2]

[2] EB-2025-0065, p.30.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &
EB-2024-0067 Revised Transcript Stakeholder Conference, p.159-161

Preamble:

EGI evidence states: *TransCanada Pipelines Limited (TCPL) – Third-Party Assignment*

- *Effective December 1, 2024, Enbridge Gas contracted for 121,142 GJ/d of incremental capacity from Niagara to the Enbridge CDA on TCPL for a 5-year term. The TCPL capacity is assigned to Enbridge Gas by a third-party for the months of December to March each year. This capacity is coupled with a supply arrangement from the third-party.*

We would like to understand better this seasonal assignment and its implications to and for the Dawn-Parkway system.

Question(s):

Does the contracted assignment come with any additional commitments?

a) How did EGI maintain a market sensitive, reasonable and competitive price given the coupling with a supply arrangement from the third-party? Please explain fully.
b) Does the arrangement require utilization of Kirkwall to CDA capacity other than that under contract to the third-party or TCPL? Please explain.
    i) Given this arrangement, is there a reduction in M12 demand between Kirkwall & Parkway to feed the EGD/CDA?
        (1) If yes, did the contract rights for in-franchise customers and associated cost get reduced? Please show using the Dawn-Parkway right before and after the contracting.

(2) If not, please explain fully, including provision of the last 5 years of demand for each of the EGD CDA and EDA and the specific contracts and quantities that were in place to meet Design Day Demands.

Response:

No, there are no additional commitments that accompany the third-party TCPL assignment capacity beyond the supply arrangement. Enbridge Gas entered into a 5-year agreement for 121,142 GJ/d of incremental supply at Niagara, along with an assignment of equivalent TCPL Mainline capacity from Niagara Falls to the Enbridge Central Delivery Area (CDA), for the months of December through March each year. The agreement includes renewal rights and allows for annual volume increases over the five-year term, up to a maximum of 255,618 GJ/d (both of which options to be exercised at Enbridge Gas's sole discretion). Following the 5-year term, the renewal rights grant Enbridge Gas the ability to reset the quantity of contracted assignment capacity for a subsequent 5-year term, up to a maximum of 255,618 GJ/d.

a) Enbridge Gas identified a significant year-over-year increase in the forecasted supply shortfall for the Enbridge CDA in its 2024/25 gas supply plan. Due to the ongoing scarcity of firm transportation capacity and high levels of peaking (delivered supply) services already contracted to the Enbridge CDA (2.7%), the Company sought to explore other commercial alternatives with trusted suppliers. Based on its knowledge of existing TCPL Mainline shippers with relevant capacity to supply the delivery area on a firm basis, Enbridge Gas discretely engaged two suppliers to explore innovative third-party solutions. These collaborative efforts were aimed at mitigating the projected shortfall and minimizing Enbridge Gas's increasing reliance on peaking services.

   As detailed in the Company's 5-Year Gas Supply Plan at Appendix J, extensive analysis (strategic and pricing) was completed in support of determining a cost-effective option (which was uniquely composed of a combination of new firm transportation capacity, TCPL assignment capacity and gas supply, and incremental peaking services).[1] Finally, the supply arrangement referenced was anchored to the monthly cost of natural gas at Dawn based on a common market index (Platts monthly) and included a fixed premium for the temporary assignment of TCPL capacity.

b) No, the agreement does not require utilization of transportation capacity from Kirkwall to the Enbridge CDA.

[1] EB-2025-0065, Appendix J, pp.10-27.

i) No, there is no design day reduction to the in-franchise need for the Dawn Parkway System as described in response at Exhibit I.2-FRPO-17.

(1) N/A

(2) The third-party TCPL transportation capacity assignment contracted to meet incremental design day demand requirements relies solely on TCE transmission capacity from Niagara to the Enbridge CDA. Accordingly, there is no design day impact on the requirement for Dawn Parkway System capacity. Table 1 provides a summary of the Enbridge CDA and EDA design day demand and available supply. Please note the incremental third-party services shown at line 4 for 2024/25 with no impact to the Dawn Parkway System requirements at line 8.

Table 1
Enbridge CDA and EDA Peak Day Demands and Supply

Line No.	Particulars (TJ)	2020/21		2021/22		2022/23		2023/24		2024/25	
		ECDA	EEDA	ECDA	EEDA	ECDA	EEDA	ECDA	EEDA	ECDA	EEDA
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	Design Day Demand	3,329	693	3,341	703	3,360	710	3,378	723	3,578	723
	Supply Assets										
2	In-franchise Supply (1)	72	0	68	0	70	0	68	0	55	0
3	Peaking	66	16	22	0	40	1	60	14	97	14
4	Third-Party Services	40	0	0	0	0	0	0	0	121	0
5	TC Energy Long-haul	5	260	5	260	5	260	5	260	39	260
6	TC Energy Short-haul (2)	668	337	768	362	768	368	768	368	787	368
7	TC Energy STS (2)	284	81	284	81	284	81	284	81	284	81
8	EGI Dawn Parkway (2)	2,194	0	2,194	0	2,194	0	2,194	0	2,194	0
9	Total (3)	3,329	693	3,341	703	3,360	710	3,378	723	3,578	723

Notes:

(1) In-franchise supply is comprised of Crowland Storage, Ontario Production, and Direct Purchase obligated deliveries.

(2) Dawn to Parkway capacity necessary for TC Energy short-haul and STS is included in line 6 and line 7. Enbridge Gas Dawn Parkway capacity at line 8 represents the Dawn Parkway System requirements that feed the Enbridge CDA directly.

(3) Total design day supply assets equal the design day demand at line 1.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &
EB-2024-0067 Revised Transcript Stakeholder Conference, p.159-161

Preamble:

EGI evidence states: *TransCanada Pipelines Limited (TCPL) – Third-Party Assignment*

- *Effective December 1, 2024, Enbridge Gas contracted for 121,142 GJ/d of incremental capacity from Niagara to the Enbridge CDA on TCPL for a 5-year term. The TCPL capacity is assigned to Enbridge Gas by a third-party for the months of December to March each year. This capacity is coupled with a supply arrangement from the third-party.*

We would like to understand better this seasonal assignment and its implications to and for the Dawn-Parkway system.

Question(s):

Please provide a schematic of the Dawn-Parkway system for the winter of 2024/25 that shows the flows and pressure on the system at the major take-offs and inter-connects assuming:

a) That the assigned third-party contract to the CDA is not obligated
b) That the assigned third-party contract to the CDA is obligated
c) Please specify the additional Dawn to Parkway capacity that can be accommodated because of the third-party assignment.

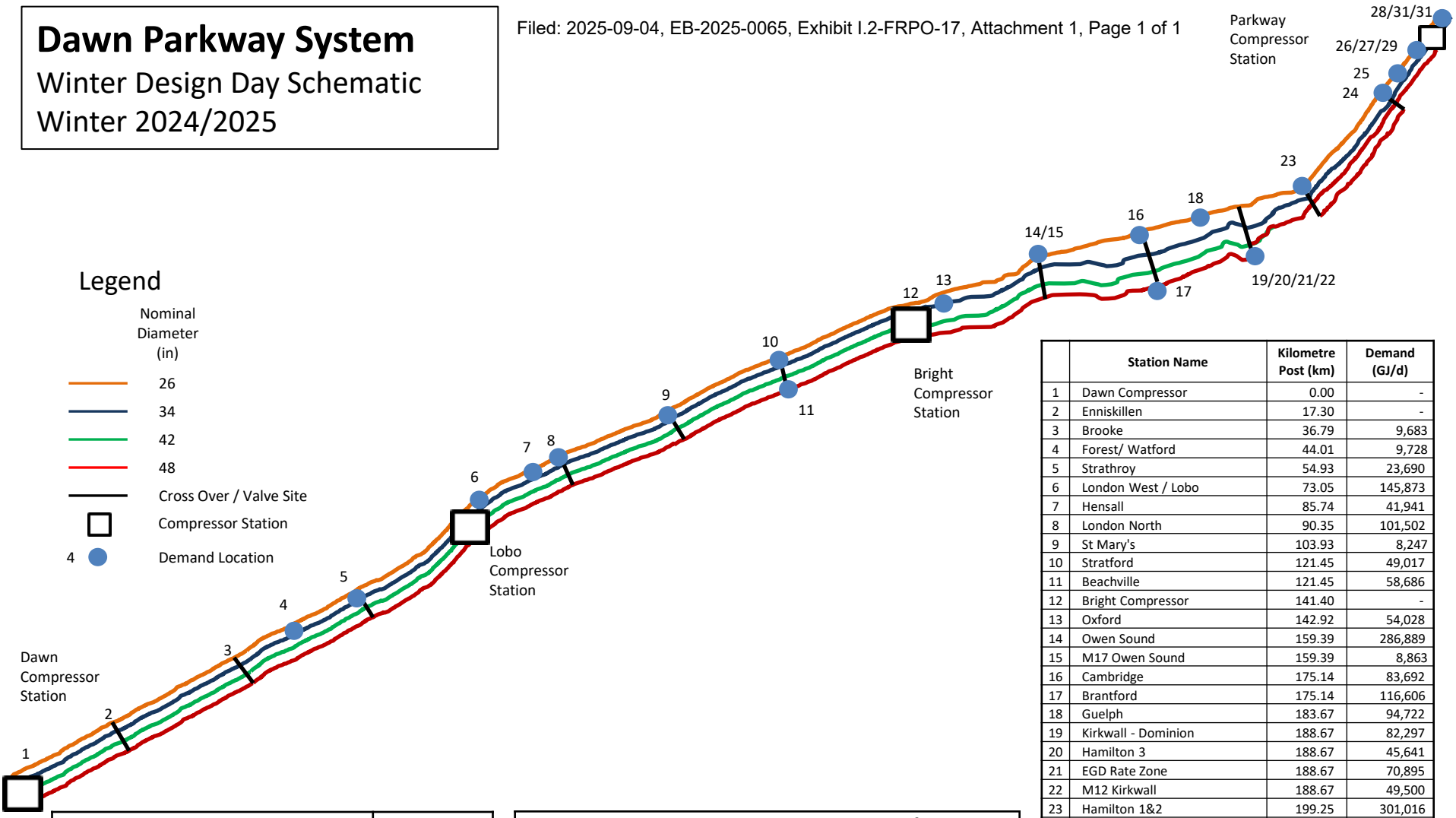
Response:

Please see Attachment 1 for a schematic of the Dawn Parkway System for Winter 2024/25.

a-c) The Dawn Parkway System schematic of design day demands provided at Attachment 1 does not change and no additional Dawn to Parkway capacity is created as a result of the 121,142 GJ/d third-party TCPL assignment capacity from Niagara to the Enbridge CDA.

Dawn Parkway System

Winter Design Day Schematic
Winter 2024/2025



	Station Name	Kilometre Post (km)	Demand (GJ/d)
1	Dawn Compressor	0.00	-
2	Enniskillen	17.30	-
3	Brooke	36.79	9,683
4	Forest/ Watford	44.01	9,728
5	Strathroy	54.93	23,690
6	London West / Lobo	73.05	145,873
7	Hensall	85.74	41,941
8	London North	90.35	101,502
9	St Mary's	103.93	8,247
10	Stratford	121.45	49,017
11	Beachville	121.45	58,686
12	Bright Compressor	141.40	-
13	Oxford	142.92	54,028
14	Owen Sound	159.39	286,889
15	M17 Owen Sound	159.39	8,863
16	Cambridge	175.14	83,692
17	Brantford	175.14	116,606
18	Guelph	183.67	94,722
19	Kirkwall - Dominion	188.67	82,297
20	Hamilton 3	188.67	45,641
21	EGD Rate Zone	188.67	70,895
22	M12 Kirkwall	188.67	49,500
23	Hamilton 1&2	199.25	301,016
24	Milton	218.09	71,294
25	Halton Hills	221.61	144,437
26	Parkway Greenbelt	228.94	21,194
27	Burlington / Bronte	228.94	177,918
28	North Rate Zone	228.94	434,482
29	EGD Rate Zone Suction	228.94	1,393,961
30	EGD Rate Zone Discharge	228.94	1,745,122
31	M12 Parkway	228.94	2,334,845
	Total South Rate Zone		**1,928,102**
	Total North Rate Zone		**434,482**
	Total EGD Rate Zone		**3,209,978**
	Total Ex-franchise		**2,393,208**
	Total Design Day Demand		**7,965,770**

System Capacity	GJ/d
Total System Capacity [1] [2]	7,747,521
Total Demand Requirement	7,699,980
Surplus (Shortfall)	47,541

[1] Includes Parkway Delivery Obligation 265,789 GJ/d

[2] Includes Supply at Kirkwall for M12 Contracts and Union Sales Service customers 444,087 GJ/d

Compressor Station Operating Conditions			
Station	**Lobo**	**Bright**	**Parkway**
Power Available (MW)	102.9	129.0	88.1
Power Required (MW)	102.9	129.0	88.1
Suction Pressure (kPag)	3771	3503	3616
Discharge Pressure (kPag)	5576	5951	6454
Compression Ratio	1.5	1.7	1.8
Flow (GJ/d)	7,325,003	6,896,816	4,334,476
Daily Fuel (GJ/d)	33,774	27,794	18,382

ENBRIDGE GAS INC.

Answer to Interrogatory from
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Interrogatory

Issue:

2

Reference:

2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &
EB-2024-0067 Revised Transcript Stakeholder Conference, p.159-161

Preamble:

EGI evidence states: *TransCanada Pipelines Limited (TCPL) – Third-Party Assignment*

- *Effective December 1, 2024, Enbridge Gas contracted for 121,142 GJ/d of incremental capacity from Niagara to the Enbridge CDA on TCPL for a 5-year term. The TCPL capacity is assigned to Enbridge Gas by a third-party for the months of December to March each year. This capacity is coupled with a supply arrangement from the third-party.*

We would like to understand better this seasonal assignment and its implications to and for the Dawn-Parkway system.

Question(s):

For the 2024/25 winter, please provide a table showing the EGI demand sources (specific delivery areas) and quantities for gas that moves through the Dawn-Parkway to the Parkway inlet (includes gas that flows directly to EGD without going through Parkway.

a) Please provide a second table that shows the respective contracts and facilities capacity to move gas east from the entrance to Parkway.

Response:

Please see the Dawn Parkway system schematic at Exhibit I.2-FRPO-17, Attachment 1. The response references the table on the right which shows station names and demands by delivery point. These are the quantities of gas that move through the Dawn Parkway system to the Parkway Compressor Station inlet. This includes gas that flows

directly to EGD without going through Parkway compression, labeled as “EGD Rate Zone Suction”. The total Dawn Parkway system design day demands that do not flow through Parkway total 3,451,321 GJ/d and are comprised of the following:

Total South Rate Zone = 1,928,102 GJ/d

- This is the amount of demand served by the Dawn Parkway system for the Union South rate zone and is the summation of rows 1-14, 16-20, and 23-27.

M17 Owen Sound = 8,863 GJ/d (row 15)

- This is an ex-franchise Rate M17 S&T contract served at the Owen Sound take-off.

EGD Rate Zone Kirkwall = 70,895 GJ/d (row 21)

- This is the component of Total EGD Rate Zone demand served to TCPL at the Kirkwall Custody Transfer Station.

M12 Kirkwall = 49,500 GJ/d (row 22)

- This is an ex-franchise Rate M12 S&T Dawn to Kirkwall contract.

EGD Rate Zone Suction = 1,393,961 GJ/d (row 29)

- This is the component of Total EGD Rate Zone demands served by the suction side of the Parkway Compressor Station at Parkway Consumers and Lisgar Gate Stations.

a) Please see the Dawn Parkway system schematic at Exhibit I.2-FRPO-17, Attachment 1. The table on the right also shows the component of demands that are served by the discharge side of the Parkway Compressor Station. The total Dawn Parkway system design day demands that flow through Parkway total 4,514,499 GJ/d and are comprised of the following:

Total Union North Rate Zone = 434,482 GJ/d (row 28)

- This is amount of Union WDA, Union NDA, Union NCDA and Union EDA (Union North Rate Zone) demands transported from Dawn and served by the discharge side of the Parkway Compressor station.

EGD Rate Zone Discharge = 1,745,122 GJ/d (row 30)

- This is the component of Total EGD Rate Zone demands transported from Dawn and served by the discharge side of the Parkway Compressor station.

M12 Parkway = 2,334,845 GJ/d (row 31)

- This is the amount of S&T contract demands served by the discharge side of the Parkway Compressor Station.

Please see Table 1 and Table 2 for a list of TCPL contracts held by Enbridge Gas that have a receipt point of Union Parkway Belt.

Table 1

EGD Rate Zone TCPL Contracts with Union Parkway Belt Receipt Point

Line No.	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)
1	FT	Union Parkway Belt	Enbridge CDA	572
2	FT	Union Parkway Belt	Enbridge CDA	40,093
3	FT	Union Parkway Belt	Enbridge CDA	15,000
4	FT	Union Parkway Belt	Enbridge CDA	8,375
5	FT	Union Parkway Belt	Enbridge CDA	24,484
6	FT	Union Parkway Belt	Enbridge CDA	70,000
7	FT	Union Parkway Belt	Enbridge CDA	75,000
8	FT	Union Parkway Belt	Enbridge CDA	100,000
9	FT	Union Parkway Belt	Enbridge CDA	18,876
10	FT	Union Parkway Belt	Enbridge EDA	170,000
11	FT	Union Parkway Belt	Enbridge EDA	13,114
12	FT	Union Parkway Belt	Enbridge EDA	25,000
13	FT	Union Parkway Belt	Enbridge EDA	6,000
14	FT-SN	Union Parkway Belt	Victoria Square #2 CDA	85,000
15	STS	Union Parkway Belt	Enbridge CDA	153,700
16	STS	Union Parkway Belt	Enbridge CDA	92,822
17	STS	Union Parkway Belt	Enbridge CDA	37,370
18		Union Parkway Belt/ Kirkwall	Enbridge EDA	35,089
19	STS	Union Parkway Belt/ Kirkwall	Enbridge EDA	35,806
20	STS	Union Parkway Belt	Enbridge EDA	9,716
	Total EGD Rate Zone (1)			1,016,017 (1)

Note:

(1) The difference between the Dawn Parkway discharge side of Parkway demands of 1,745,112 GJ/d and the contracts listed in Table 1 is a result of 800,000 GJ/d of Parkway to EGT contracts that flow on the Albion pipeline (and do not require TCPL contracts), and two contracts which have both Parkway and Kirkwall as receipt points and flow from Kirkwall instead of Parkway.

Table 2

Union North Rate Zones TCPL Contracts with Union Parkway Belt Receipt Point

Line No.	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)
1	EMB	Union Parkway Belt	Union EDA	25,000
2	FT	Union Parkway Belt	Union EDA	30,000
3	FT	Union Parkway Belt	Union EDA	5,000
4	FT	Union Parkway Belt	Union EDA	75,000
5	FT	Union Parkway Belt	Union EDA	181
6	FT	Union Parkway Belt	Union EDA	9,105
7	FT	Union Parkway Belt	Union EDA	5,000
8	FT	Union Parkway Belt	Union EDA	9,128
9	FT	Union Parkway Belt	Union NCDA	661
10	FT	Union Parkway Belt	Union NCDA	439
11	FT	Union Parkway Belt	Union NCDA	887
12	FT	Union Parkway Belt	Union NCDA	2,000
13	FT	Union Parkway Belt	Union NCDA	6,912
14	FT	Union Parkway Belt	Union NCDA	884
15	FT	Union Parkway Belt	Union NDA	10,000
16	FT	Union Parkway Belt	Union NDA	9,000
17	FT	Union Parkway Belt	Union NDA	24,000
18	FT	Union Parkway Belt	Union NDA	10,401
19	FT	Union Parkway Belt	Union NDA	6,228
20	FT	Union Parkway Belt	Union NDA	67,000
21	STS	Union Parkway Belt	Union EDA	26,351
22	STS	Union Parkway Belt	Union NDA	48,375
23	STS	Union Parkway Belt	Union WDA	31,420
24	STS	Union Parkway Belt	Union NCDA	13,704
	Total Union North Rate Zones			416,676 (1)

Note:

(1) The difference between the Dawn Parkway discharge side of Parkway demands of 434,482 GJ/d and the contracts listed in Table 2 is a result of TCPL fuel requirement which is transported from Dawn to Parkway but is not required to be transported to the North delivery areas, and STS Firm Pooling withdrawals.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

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2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &
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EGI evidence states: *TransCanada Pipelines Limited (TCPL) – Third-Party Assignment*

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We would like to understand better this seasonal assignment and its implications to and for the Dawn-Parkway system.

Question(s):

Please provide a schematic of the Dawn-Parkway system for the winter of 2024/25 that shows the flows and pressure on the system at the major take-offs and inter-connects assuming:

a) That the assigned third-party contract to the CDA is not obligated

b) That the assigned third-party contract to the CDA is obligated

Response:

Please see response at Exhibit I.2-FRPO-17.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.35, 39, 40 & EB-2020-0091 EGI 2025-34 AMP &
EB-2024-0067 Revised Transcript Stakeholder Conference, p.159-161

Preamble:

On page 42 of Appendix A in the EGI 2025-34 Asset Management Plan (AMP), EGI identifies its expectation to add 17km of NPS 48 between Kirkwall and Hamilton on the Dawn-Parkway system. We would like to understand the contemplated investments and considerations of the opportunity of IRP.

Question(s):

Please provide a reference in this evidence of the demand that supports this project.

a) If not included in this evidence, please provide evidence defining the need to initiate this project.

b) The CAPEX from the Spend Profile shows $18M forecast to be spent in 2026. Please outline what investments are contemplated in that spend.

c) Please provide a full explanation of the steps that EGI intends to take to canvas the market to determine if entities could provide firm, obligated deliveries at Parkway as an IRP Alternative.

    i) Notwithstanding what the company may state about customers wanting to be at Dawn, please provide EGI's views on the willingness to include the opportunity for customers currently providing obligated deliveries at Dawn to shift those obligated deliveries to Parkway.

d) Please provide a full explanation of the steps that EGI intends to take to determine if entities would provide firm, obligated deliveries at Kirkwall as an IRP Alternative.

    i) Please provide a graph showing the physical flows into Kirkwall from TC Energy's Niagara line over the last three winters.

ii) Using the average of a consecutive week of minimum flow days as a hypothetical firm supply, please provide the amount of Dawn to Parkway capacity that that amount of firm, obligated supply would provide.

Response:

a-d) For brief details about this proposed Dawn-Parkway Expansion Project, please see references from the most recent 2025 to 2034 Asset Management Plan (AMP)[1] noted in response at Exhibit I.2-ED-7, part b).

Further details about the proposed project and potential IRP alternatives for that project are not relevant or in scope for this proceeding. Questions on that topic will be in scope when Enbridge Gas advances the proposed project through a leave to construct application.

[1] EB-2020-0091, Enbridge Gas Asset Management Plan 2025-2034, November 8, 2024.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B
& EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble:

We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

Question(s):

Given the cost estimates for Panhandle Regional Expansion project in EB-2022-0157, using the unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), what is the value of avoided cost of the firm deliveries at Ojibway?

a) Please provide a summary of communications between EGI Energy Transfer Partners regarding the river crossing at Ojibway.

   i) Please provide any future plans to enhance the river crossing.

Response:

Using the cost estimates for the Panhandle Regional Expansion project[1] unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), the value of firm deliveries at Ojibway in the gas supply plan is estimated to be a maximum of $167/GJ/day per year. Please see Table 1.

[1] EB-2022-0157.

Table 1

Annual Cost per GJ of Panhandle Transmission Capacity

Maximum Annual Revenue Requirement	Project Capacity	Annual Cost per GJ of Transmission Capacity
(a)	(b)	(c) = (a) / (b)
$28.071 million	168,000 (GJ/day)	$167/GJ/day per year or $0.46/GJ/day

a) In July 2024, Enbridge Gas communicated to Energy Transfer its intention to complete an in-line inspection of the Detroit River Crossings in 2025. Enbridge Gas also provided Energy Transfer with the contact information of the in-line inspection vendor. In August 2024, Enbridge Gas communicated to Energy Transfer that the Company had commenced the detailed planning process for 2025 integrity programs and requested that Energy Transfer confirm their intent to participate (or not) in the inspection. If Energy Transfer did not participate, then Enbridge Gas intended to proceed with inspecting only its own segment of the Detroit River Crossings assets.

In November 2024, Enbridge Gas renewed 35,000 Dth/d (36,927 GJ/d) of existing capacity from Field Zone (Markwest) to the US/Canadian border (Ojibway) for a 2-year term effective November 1, 2025. While Enbridge Gas has previously negotiated for capacity renewal terms with Panhandle Eastern Pipeline (PEPL) ranging from 3-5 years, both companies mutually agreed that a 2-year contract renewal was appropriate considering the planned integrity inspection in 2025. From Enbridge Gas's perspective, a 2-year renewal provided additional contracting flexibility at a time when the integrity inspection of the Detroit River Crossings assets was being completed.

In Q4 2024 and Q1 2025, Enbridge Gas coordinated with Energy Transfer for a suitable maintenance window to complete the inspection of Detroit River Crossings.

In April 2025, Enbridge Gas completed the in-line inspection of the Enbridge Gas segment of the Detroit River Crossings in coordination with Energy Transfer.

In July 2025, Enbridge Gas communicated to Energy Transfer that the inspection of the Enbridge asset was completed, and the Enbridge Gas segment of the pipelines are fit for service.

There are no further discussions planned between Enbridge Gas & Energy Transfer regarding the Detroit River Crossing.

i) Enbridge Gas does have any future plans to enhance the Detroit River Crossings.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B
& EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble:

We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

Question(s):

Please provide a map showing and identifying the interconnections of pipelines to the SIL (including all pipeline connections e.g., Vector, Bluewater, etc.).

a) Please provide the specific receipt and delivery points of the Bluewater and St. Clair transportation contracts.
   i) If these tie into other pipelines and contracts, please describe.

b) Please provide the flow capabilities of each connection to EGI's system and/or the SIL.

c) Please provide a schematic that depicts the design day flows and pressures at the pipeline interconnection points and the system low point.
   i) Please ensure the schematic includes the HDD associated with design day, the amount of interruptible demand and whether this demand was assumed on or off for the purpose of the design day shown in the schematic.

d) Given the cost estimates for the SIL Reinforcement in EB-2019-0218, using the unit cost of capacity (maximum annual revenue requirement divided by peak day

capacity created), what is the value of avoided cost of the firm deliveries at the interconnection of Vector Canada to the SIL?

e) Given the cost estimates for the SIL Reinforcement in EB-2019-0218, using the unit cost of capacity (maximum annual revenue requirement divided by peak day capacity created), what is the value of avoided cost of the firm deliveries at the interconnection of Bluewater to the SIL?

f) Please provide the most recent assessments over the last 3 years for purchasing storage at Bluewater.

   i) Can the Washington-10 storage store gas from Vector in conjunction with other contracts?

g) Would contracting for Washington-10 storage diversify EGI's storage?

h) How is the utility compensated for ex-franchise HUB services utilization of the Bluewater, Vector or other crossings?

i) Please provide the quantities of HUB services facilitated for and the payments from the non-utility storage portfolio for transport from import/export points (Vector, Ojibway, St. Clair, Bluewater, etc.)?

Response:

Please see Attachment 1 for a schematic of the Sarnia Industrial Line (SIL) System including interconnection points with other pipelines. Please also see the Enbridge Gas Storage Map set out at Appendix B, Figure B-12, of the 5-Year Gas Supply Plan pre-filed evidence. Finally, a detailed map of the North American pipeline systems supplying Ontario and beyond, including those referenced by FRPO can be accessed on Enbridge Gas's website.[1]

a) The current St. Clair River Crossing pipeline capacity of 214,000 GJ/d has firm receipt and delivery points at DTE St. Clair and Union St. Clair, respectively. The St. Clair River Crossing pipeline directly connects the MichCon/DTE system in Michigan, including access to MichCon/DTE gas supply and storage, to the Enbridge Gas Ontario system. Volumes transported into Canada via the St. Clair River

[1] https://www.enbridgegas.com/-/media/Extranet-Pages/Storage-and-transportation/Doing-Business-with-Enbridge-Gas/Service-Area-and-Pipeline-Maps/north-american-pipelines-enbridge.pdf?rev=fe0ad47e92fe4d0d83a335e2ac30d660

Crossing pipeline can be directed to the SIL System to serve the Sarnia market. Please see response at part b) for additional details regarding the St. Clair River Crossing pipeline.

The current Bluewater River Crossing pipeline capacity of 127,000 GJ/d has firm receipt and delivery points at Bluewater Gas Storage Transfer Point and St. Clair/Union Interconnect, respectively. The Bluewater River Crossing pipeline directly connects the Bluewater Gas Storage system in Michigan to the Enbridge Gas Ontario system. Volumes transported into Canada via the Bluewater River Crossing pipeline can be directed via the SIL System (at the Bluewater Interconnect Station) to serve the Sarnia market. Please see the response at part b) for additional details regarding the Bluewater River Crossing pipeline.

b) The SIL System is supplied by four directly connected third-party upstream pipelines as well as through Enbridge Gas's own facilities. A fifth pipeline, the Niagara Gas Transmission Limited LINK Pipeline, which is owned by an Enbridge Gas affiliate, crosses but does not interconnect with the SIL system on its way to the Enbridge Gas Corunna Compressor Station.[2]

The capability of upstream third-party pipelines to deliver gas to the SIL System is a function of the interconnect station's capacity and the ability for the upstream third-party pipelines to deliver to the interconnect station. The SIL System's pipeline limitations downstream of the interconnect stations, including considerations to operational conditions and minimum markets, may impact the capability to accept volumes up to the listed capacities below. Each upstream third-party pipeline has unique characteristics and considerations.

<u>Upstream Third-Party Pipelines</u>

The four upstream third-party pipelines that flow gas from Michigan into Ontario and interconnect with the SIL System are:

1. Great Lakes Canada Pipeline Ltd. (GLC)/Great Lakes Gas Transmission (GLGT)

[2] The LINK pipeline was constructed in 1995 by Niagara Gas Transmission Limited, which is an affiliate of Enbridge Gas. This NPS 24 pipeline connects to upstream pipelines in Michigan including ANR and DTE and downstream at Enbridge Gas's Tecumseh Gas Storage facility ("Tecumseh"). Located on Tecumseh Road between Rokeby Line and Moore Line. From Tecumseh, the LINK pipeline connects to the Dawn Hub through two NPS 30 pipelines. This pipeline facility does not interconnect with Enbridge Gas's SIL System. However, it does cross the NPS 20 Payne Sarnia pipeline, and the NPS 12 and NPS 20 SIL system pipelines.

The Dawn Extension Pipeline owned by TC Energy affiliate GLC directly connects to the SIL System at the Great Lakes Courtright Station (Great Lakes Courtright) and directly connects to the Dawn Hub further east.

The interconnect station from GLC system into the SIL System at Great Lakes Courtright can flow up to 330 TJ/d depending on operating conditions.

At times, the GLGT/GLC system has experienced reverse flow conditions under which Enbridge Gas provides natural gas from the Dawn Hub to GLC/GLGT for flow westerly into Michigan. Under reverse flow conditions Enbridge Gas cannot direct supply into the SIL System at Great Lakes Courtright from the Dawn Hub.[3]

2. Vector Pipeline L.P. (Vector)

   The Vector pipeline owned by Vector Pipeline L.P. directly connects to the SIL System at the Vector Courtright Station (Vector Courtright") and directly connects to the Dawn Hub further east (similar to the GLGT/GLC system).

   The interconnect station from the Vector pipeline into the SIL System at Vector Courtright can flow up to 600 TJ/d depending on operating conditions.

   At times, the Vector system has experienced reverse flow conditions under which Enbridge Gas provides natural gas from the Dawn Hub to Vector for flow westerly into Michigan.

3. DTE Energy (DTE)/St. Clair Pipelines (St. Clair Pipelines L.P.)

   DTE is a large natural gas distribution utility located in Michigan which also owns transmission pipelines and storage assets. DTE connects to St. Clair Pipelines L.P.'s St. Clair River Crossing pipeline at the international border.[4] The St. Clair River Crossing pipeline flows into the Enbridge Gas NPS 24 St. Clair pipeline which connects to the SIL System at the St. Clair Line Station located near Great Lakes Courtright and Vector Courtright.

[3] Enbridge Gas cannot displace natural gas directed into the SIL system at either Emerson or other points on the GLGT system. To direct natural gas into the SIL System during reverse flow on the GLC/GLGT system, Enbridge Gas would require a Dawn to St. Clair transportation service on the TC Energy Mainline.
[4] St. Clair Pipelines L.P., an affiliate of Enbridge Gas.

The Enbridge Gas interconnect station capacity from DTE into the SIL System at the St. Clair Line Station is 230 TJ/d dependent upon operating conditions.

4. Bluewater Gas Storage, LLC (BGS)/Bluewater Pipeline (St. Clair Pipelines L.P.).

   BGS is a natural gas storage operator located in Michigan that offers storage, balancing and transportation (wheeling) services, some of which support services to inject in Michigan and withdraw at the Dawn Hub. The BGS system connects to St. Clair Pipelines L.P.'s Bluewater Pipeline at the international border.

   The Bluewater Pipeline connects to the SIL System at the Bluewater Interconnect Station.

   The Bluewater Interconnect can flow up to 300 TJ/d of BGS supply into the SIL System depending upon operating conditions.

Enbridge Gas Facilities

1. Dow A Storage Pool

   Enbridge Gas's Dow A Pool provides supply directly into the SIL System. The Dow A Pool is located at the north end of the SIL System near the City of Sarnia. The Dow A Pool uses SIL System flow to inject into (fill) the pool in the summer, which contributes to an increased summer design day demand in the Sarnia market of 44 TJ/d. During the winter, withdrawals from the Dow A Pool (empty the pool) of approximately 74 TJ/d of supply is available to supply the Sarnia market to meet a winter design day.

2. NPS 8 Dawn Kimball Pipeline

   The NPS 8 Dawn Kimball Pipeline supplies the lower pressure pipeline systems located at the north end of the SIL System. The NPS 8 Dawn Kimball Pipeline directly connects the SIL System to the Dawn Hub. However, due to its lower operating pressure, the Dawn Kimball pipeline cannot provide supply to the higher-pressure pipelines in the SIL System directly. The NPS 8 Dawn Kimball Pipeline provides supply of 18 TJ/d in the summer and 14 TJ/d in the winter.

3. NPS 20 Payne Sarnia Pipeline

   The NPS 20 Payne Sarnia pipeline is directly connected to SIL System and provides 386 TJ/d of Dawn to SIL System supply in the Summer.

   The NPS 20 Payne Sarnia Pipeline originates at the Enbridge Gas Payne Pool and is supplied by the Payne Pool storage pipeline between Dawn and Payne Pool. The Payne Pool Pipeline is not available to the SIL System on very cold winter days as storage pipelines deliver high moisture content (wet) storage gas to Dawn. This gas cannot be diverted into the Sarnia market because there are no dehydration facilities to dry the wet gas withdrawn from storage which could freeze off customer stations. Additionally, the pressure in the storage pools may not be sufficient to deliver to the SIL System without compression.

4. NPS 10 Payne Kimball Pipeline

   NPS 10 Payne Kimball pipeline connects the SIL System to Enbridge Gas's storage system at the Payne Kimball Station. The NPS 10 Payne Kimball pipeline can provide up to 82 TJ/d into the SIL System and has historically provided some security of supply for the Sarnia market in the summer. Similar to the NPS 20 Payne Sarnia pipeline, the NPS 10 Payne Kimball pipeline is served by the Payne Pool pipeline between Dawn and Payne Pool which is not available on very cold days in the winter.

c) The schematic at Attachment 1, illustrates SIL System Design Day for Winter 2024/25 at the design day condition of 40.8 HDDw where interruptible demand is curtailed or "off" (IOFF).

   The SIL System has two distinct components related to design day: Gas Supply Planning, and facilities design.

   - The Gas Supply Plan is required to only serve the firm average daily SIL System demand, which is 616,773 GJ/d. Interruptible demand of 69,139 GJ/d is curtailed. In other words, the SIL System needs 616,773 GJ/d of firm supply on design day. Interruptible customers can be curtailed if required to align with the firm gas supply availability.
   - The facilities design, which sizes the pipeline assets between supply points and customer demand locations, is required to serve both the firm

(at peak hour) and interruptible demand. The total demand served by the SIL System is 696,136 GJ/d at the peak hour[5].

d-e) The SIL System historically developed directly from the TC Energy Great Lakes system pipeline at the Great Lakes Courtright. The SIL Systems' main transmission pipelines extend north from this location. Enbridge Gas's (Union Gas at the time) gas supply plan had robust amounts of supply flowing on the Great Lakes system past Great Lakes Courtright on its way to Dawn. This supply was diverted into the SIL System. Over time other upstream third-party pipelines were constructed to flow past and intersect with the SIL System (Vector, St Clair). There was enough of Enbridge Gas's gas supply flowing past the interconnect locations that a pipeline connecting the SIL System to Dawn was not required. Over time the amount of gas supply flowing past Great Lakes Courtright and other interconnects has dropped as the annual demand has decreased while the design day demand for the SIL system has increased due to the growth in Petro-chemical and power generation demand.

The gas supply plan contracts that flow past Courtright on Vector, Great Lakes and DTE/MichCon provide supply to the SIL System and has reduced the need for facilities between Dawn Hub and the SIL System.

The facilities contemplated in EB-2019-0218 created SIL System capacity by reducing the pressure drop within the SIL system. It did not increase capacity between Dawn Hub and the SIL System which is located upstream of the SIL System.

To be responsive Enbridge Gas has provided an illustrative example using a recent cost estimate for facilities to increase the upstream capacity from Dawn to the SIL System which has an estimated cost of ~$250 million to create ~250 TJ/d of Dawn to SIL System capacity.

The estimated annual revenue requirement of $19.602 million for a $250 million facility project assumes that the Dawn to SIL System facilities have similar financial inputs as the Panhandle Regional Expansion Project.

The value of firm deliveries to the SIL System in the gas supply plan is estimated to be $78/GJ/d per year using the illustrative example as calculated in Table 1.

[5] EB-2022-0200, Exhibit 2, Tab 7, Schedule 1, pp.16-17.

Table 1

Annual Cost per TJ of Dawn to SIL System Capacity

Maximum Annual Revenue Requirement	Project Capacity	Annual Cost per GJ of Transmission Capacity
(a)	(b)	(c) = (a) / (b)
$19.602 million	250,000 (GJ/day)	$78/GJ/day per year or $0.21/GJ/day

f) Enbridge Gas has not completed any assessments of Bluewater storage in the past 3 years.

i) While Washington-10 storage facilities can receive and store gas supply delivered from Vector pipeline, the Company's existing Vector transportation contracts are not well suited to facilitate effective utilization of storage capacity at Washington-10. Enbridge Gas's existing Vector transportation contracts do not have in-path storage injections points contracted on a firm basis and could be subject to curtailment. Therefore, alternative and/or incremental firm Vector or other (e.g., DTE/MichCon) transportation capacity may be required to effectively utilize Washington 10 storage. Please see the 5-Year Gas Supply Plan at Appendix B, Figure B-13, page 28, for a map of south-Michigan storage, including the Washington-10 facility.

g) Yes, contracting for Washington 10 storage services could diversify Enbridge Gas's storage portfolio if it is combined with sufficient firm transportation capacity to fully cycle (fill and empty) and deliver volumes in a comparable manner to Dawn storage capacity currently contracted as discussed in response at part f) i).

h) Enbridge Gas is compensated for ex-franchise hub services that utilize the Bluewater, Vector or other crossings based on the hub pricing schedule at the time of the transaction. Any interruptible short-term transportation revenue generated under hub services is included in utility storage and transportation (S&T) revenue and subject to sharing during an incentive rate-setting mechanism term consistent with the earning sharing mechanism. Enbridge Gas's 2024 Rebasing Test Year Forecast included $12.1 million[6] of revenue related to short-term transportation on all paths that form part of S&T margin which reduced the revenue requirement for in-franchise customers.

[6] EB-2022-0200, Rate Order, Working Papers, Schedule 19, p.32, column (j), line 358, updated March 15, 2024.

i) Non-utility storage services have a receipt and delivery point of Dawn (Facilities) and do not utilize the gas supply plan. Non-utility storage customers may or may not contract for ex-franchise hub transportation services. For a discussion of ex-franchise hub transportation services please see response to part h) above.

Sarnia Industrial Line System

Winter Design Day Schematic

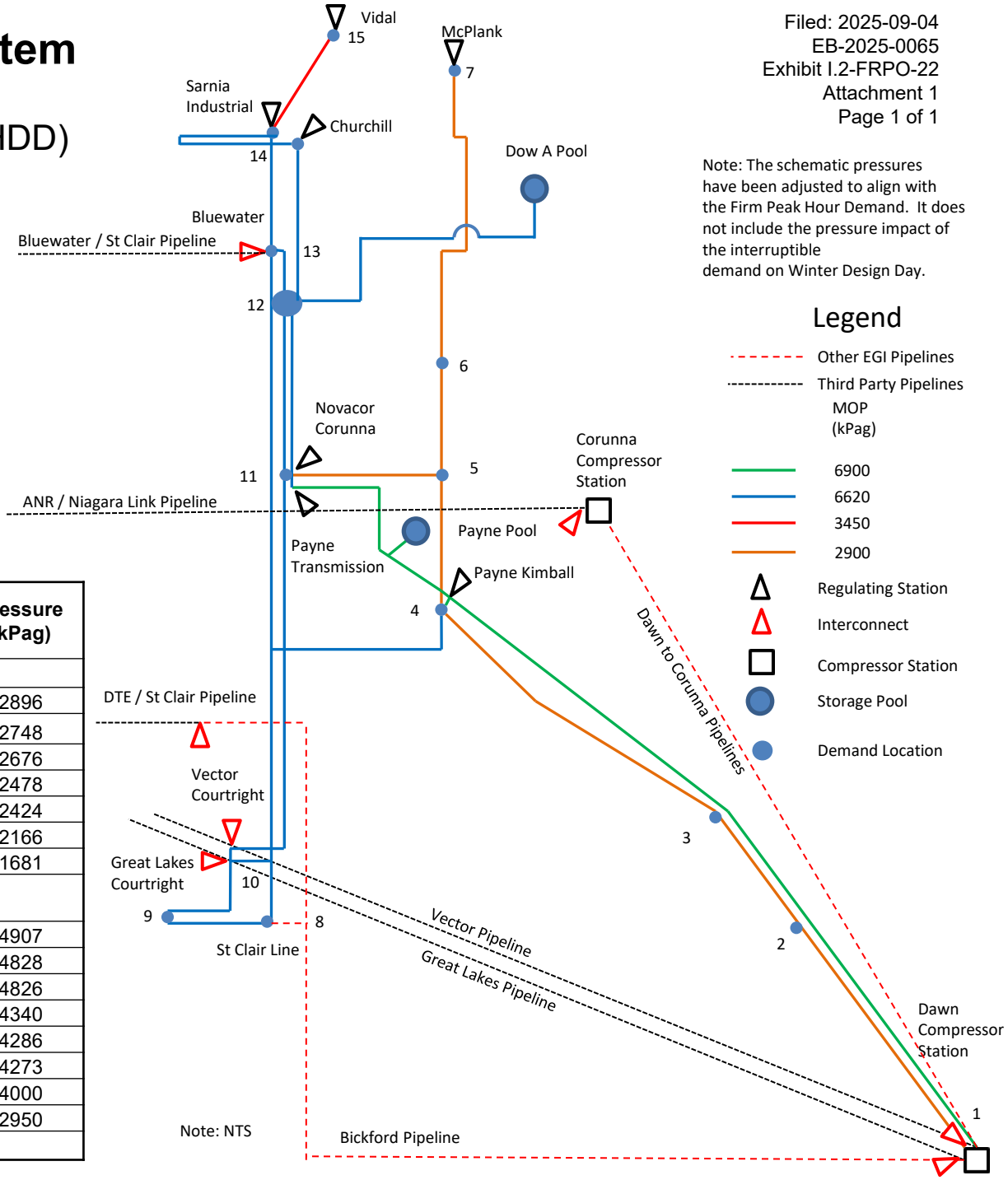
Winter 2024/2025 – IOFF - (40.8 HDD)

Filed: 2025-09-04
EB-2025-0065
Exhibit I.2-FRPO-22
Attachment 1
Page 1 of 1

System Demand & Capacity	Peak Hour GJ/d	Daily GJ/d
Firm Demand	626,997	616,773
Interruptible Demand	69,139	69,139
Total Demand	696,136	685,912
System Capacity	717,115	NA
Capacity Surplus	20,979	NA

System Supply	Daily GJ/d
Firm Supply Requirement	616,773
Firm Supply Available	670,395
Firm Surplus Supply	53,622

	Station Name	Kilometre Post (km)	Firm PH Demand (GJ/d)	Pressure (kPag)
Distance from Dawn				
1	Dawn	0.0	0	2896
2	Sombra Lot 28 Conc 15	6.8	6	2748
3	Moore Young Line	10.1	28	2676
4	Payne Kimball	19.2	260	2478
5	Allied Petrosar	22.2	3270	2424
6	Corunna	24.6	1164	2166
7	McPlank	32.4	39273	1681
Distance from St. Clair Line Station				
8	St. Clair Line	0.0	1	4907
9	Terra Area	0.0	50678	4828
10	Great Lakes / Vector	1.4	0	4826
11	Novacor Corunna Area	10.5	129383	4340
12	Dow Area	14.8	170979	4286
13	Bluewater / LaSalle	16.3	75	4273
14	Churchill / SRCP Area	18.8	152939	4000
15	Vidal Area	21.5	78940	2950
	Total Demand		626,997	



Note: The schematic pressures have been adjusted to align with the Firm Peak Hour Demand. It does not include the pressure impact of the interruptible demand on Winter Design Day.

Legend

- Other EGI Pipelines
- Third Party Pipelines
- MOP (kPag)
  - 6900
  - 6620
  - 3450
  - 2900
- Regulating Station
- Interconnect
- Compressor Station
- Storage Pool
- Demand Location

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B
& EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble:

We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

Question(s):

Please provide an update on EGI's open season and reverse open season for Dawn (Facilities) to Dawn (Vector).

a) Please explain the potential benefits of this capacity to support deliveries to the Sarnia Industrial Line (possibly respond in conjunction with Question 15 for context).

Response:

Enbridge Gas issued a Binding Existing Capacity Open Season for C1 Transportation on December 2, 2024. Through the open season, Enbridge Gas offered up to 120,000 GJ/d of firm C1 Transportation service on the Dawn to Dawn-Vector path beginning April 1, 2025, for a minimum five year term.

The open season closed on December 16, 2024. On December 19, 2024 Enbridge Gas posted details of the successful bids,[1] which included 79,159 GJ/d of firm capacity awarded.

[1] https://www.enbridgegas.com/-/media/Extranet-Pages/Storage-and-transportation/news-announcements/open-seasons/dec-2-2024/Successful-Bid-Details---Open-Season-C1-Transportation---Dec-19-2024.pdf

a) Dawn to Dawn-Vector transportation capacity only provides service between Dawn (Facilities) and the Enbridge-Vector interconnect. To support firm deliveries to the Sarnia Industrial Line (SIL) System incremental firm backhaul transportation capacity on Vector Canada Pipeline between the Enbridge-Vector interconnect and Vector-Courtright is required.

   If combined with firm backhaul transportation capacity, the incremental Dawn to Dawn-Vector capacity being offered can provide an economic alternative to existing firm Vector pipeline capacity, in terms of meeting the peak day requirements of the SIL. However, as incremental backhaul Dawn-Vector to Courtright capacity on Vector Canada Pipeline was not available to contract at the time, Enbridge Gas did not participate in the Dawn to Dawn-Vector open season. Please see response at Exhibit I.2-CCC-6 for additional details regarding the design day demand and supply contracts serving the SIL (winter 2024/25), including via Vector Canada Pipeline backhaul services.

   Please also see response at Exhibit I.2-FRPO-22 for further discussion regarding the SIL.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B
& EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble:

We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

Question(s):

Please provide a map showing the entire Vector, Rover and Nexus pipeline paths (including back to the field zone of Clarington or Kensington) and their interconnection near Milford Junction.

a) Please provide the amount of available capacity from the field zone to Milford for:
   i) Rover
   ii) Nexus

Response:

Figure 1 provides the Vector, Rover, and NEXUS pipeline detail requested. A full-sized version of the map included in Figure 1 is available on Enbridge Gas's website.[1]

[1] https://www.enbridgegas.com/-/media/Extranet-Pages/Storage-and-transportation/Doing-Business-with-Enbridge-Gas/Service-Area-and-Pipeline-Maps/north-american-pipelines-enbridge.pdf?rev=fe0ad47e92fe4d0d83a335e2ac30d660

Figure 1: Mid-Continent Natural Gas Pipelines Map

a)

i) The Rover pipeline does not interconnect at Milford Junction; it connects at Rover FIN (Fulton Interconnect) point which is west of Milford Junction on the Vector pipeline. Enbridge Gas is not currently aware of the amount of available capacity on Rover (for any particular path or segment).[2]

ii) According to the NEXUS website[3], transportation capacity is currently showing as available at both Clarington and Kensington beginning November 1, 2025, and extending through at least March 31, 2025, of 110,000 dth/day from Clarington and 180,000 dth/day from Kensington.

[2] Rover is currently holding an open season for pipeline capacity with a receipt point of Rover Supply Zone and delivery points of Defiance (ANR Interconnect), Falcon (Panhandle Interconnect), FIN (Vector Interconnect) or Dawn, subject to available capacity. It is not clear what capacity is being offered through the open season: https://rovermessenger.energytransfer.com/ipost/ROVER/notice/show/53863

[3] https://rtba.enbridge.com/InformationalPosting/Default.aspx?bu=NXUS&Type=UNS. Available capacity values taken as of August 27, 2025.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.40-3, 67-8 & EB-2024-0067 OEB Staff Report Appendix B
& EB-2024-0067 Revised Transcript Stakeholder Conference, p.134-143

Preamble:

We would like to understand the benefits and utilization of the transport contracts to the west of Dawn.

Question(s):

Please confirm that there is eastbound capacity from Joliet to Milford Junction.

a) Please confirm that Vector has/is attempting to expand capacity from Rover to Joliet.
b) Would that expansion suggest that there is a premium basis at Joliet relative to the connection of Rover and Nexus to the Vector pipeline? Please explain fully.

Response:

Confirmed. Enbridge Gas understands that there is currently up to about 200,000 Dth/d of eastbound capacity from Joliet to Milford Junction available on the Vector pipeline.

a) During Vector Pipeline's (Vector) 2024 Customer Meeting held on October 10, 2024,[1] a proposed westbound expansion project was announced. The expansion project was projected to provide approximately 200,000 Dth/d of incremental transportation capacity from supply points such as Rover, NEXUS, or Milford, to

[1] https://www.vector-pipeline.com/~/media/EepEeqMep/Site-Documents/Vector/News-Releases/Vector-2024-Customer-Meeting.pdf

Joliet. The anticipated in-service date for this expansion was tentatively set for either 2026 or 2027. Vector indicated that the progression of this project would be contingent upon securing binding commitments from one to two anchor shippers. Following the execution of these agreements, Vector planned to initiate an open season to assess broader market interest in the remaining available capacity.

As of the date of this response, no updates regarding the status of this proposed expansion project or related open season have been received, and the topic was not raised during Vector Pipeline's 2025 Customer Meeting.[2] At this time, Enbridge Gas remains unaware of the status of the previously proposed expansion project.

b) No, the announcement of expansion projects is not always an indication of a basis premium between two trading/market locations. Basis differentials are influenced by a wide range of factors, including regional supply and demand dynamics, infrastructure constraints, market liquidity, and transportation economics. While pipeline expansions can contribute to changes in basis, they are typically driven by specific market signals such as incremental demand from shippers, the technical feasibility of expansion, incremental supplies from producers, and the overall economic viability of the project. As such, the announcement or execution of a pipeline expansion does not inherently imply the presence of a premium basis at the delivery point. Additionally, it is important to consider the relative market liquidity of various interconnects. For example, Joliet is generally recognized as a more liquid and actively traded market compared to interconnects such as Rover FIN (Fulton Interconnect) or NEXUS Milford Junction, making Joliet more attractive to certain market participants.

[2] https://www.vector-pipeline.com/~/media/EepEeqMep/Site-Documents/Vector/News-Releases/Vector-January-2025-Customer-Meeting.pdf

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.45, Table 7

Preamble:

We would like to understand better the options available to Planned Unutilized Capacity.

Question(s):

Please provide alternatives considered for the levels of unutilized capacity shown in Table 7.

a) When was the last RFP and results for peaking service for each of:
   i) Union North West
   ii) Union North East

Response:

All supply/service options considered and evaluated by Enbridge Gas to manage average day demands are discussed in the 5-Year Gas Supply Plan at Section 5.7[1]. Enbridge Gas does not specifically seek to hold any volume of unutilized capacity in its gas supply plan. Accordingly, the Planned Unutilized Capacity figures presented in Table 7 are simply the result of comparing the planned utilization of selected supply/service options to their respective contract capacity.

a) The last RFP and results for peaking service were as follows:

   i) Union North West rate zone – the most recent RFP for winter 2023/24 season peaking services closed on October 17, 2023, resulting in procurement of:

[1] EB-2025-0065, p.60.

- 7,047 GJ/d of firm supply, callable over 10 days during December 2023 to March 2024, for the Union WDA; and
- 206 GJ/d of firm supply, callable over 10 days during December 2023 to March 2024, for the Centrat MDA.

ii) Union North East rate zone – the most recent RFP for winter 2024/25 season peaking services closed on October 22, 2024, resulting in procurement of:

- 1,906 GJ/d of firm supply, callable over 10 days during December 2024 to March 2025, for the Union EDA.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.48 & 50, Tables 9 & 10

Preamble:

We would like to understand better the evolution of load balancing in EGI's GSP for 2025/26 given our concern over Table 10 showing a reduction in Annual Demand sourced at Dawn and the separation of reporting described on page 48.

Question(s):

Please provide the total capacity of Market-based Storage currently held by EGI for the winter of 2025/26.

a) Notwithstanding EGI's plan to address the Company's gas supply plan changes in the 2026 GSP Update, please provide the incremental monthly Dawn-based purchases planned for this winter to reflect the reduction in storage.

Response:

The total capacity of market-based storage currently held by Enbridge Gas for the winter of 2025/26 is 17 PJ.

a) Enbridge Gas is currently in the process of preparing the 2025 gas supply plan (including the winter 2025/26 season). The 2025 gas supply plan will reflect 17 PJ of market-based storage (a reduction of 9 PJ from the 26 PJ of market-based storage included in the 2024 gas supply plan).

   The reduction in market-based storage of 9 PJ is expected to result in a 9 PJ increase in winter purchases and a corresponding decrease in summer purchases.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.48 & 50, Tables 9 & 10

Preamble:

We would like to understand better the evolution of load balancing in EGI's GSP for 2025/26 given our concern over Table 10 showing a reduction in Annual Demand sourced at Dawn and the separation of reporting described on page 48.

Question(s):

Please provide the rationale for the reduction in Annual Demand Sources of Supply given the economics of WCSB gas.

Response:

Please see response at Exhibit I.2-STAFF-8.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.48 & 50, Tables 9 & 10

Preamble:

We would like to understand better the evolution of load balancing in EGI's GSP for 2025/26 given our concern over Table 10 showing a reduction in Annual Demand sourced at Dawn and the separation of reporting described on page 48.

Question(s):

Please explain the volatility in Dawn purchases supplying the Union North East over the horizon provided.

Response:

The variability in Dawn supply for Union North East over the forecast period is primarily driven by diversions from Union WDA, located in the Union North West rate zone, to Union NDA and Union EDA in the Union North East rate zone during the 2024/25 and 2026/27 years, reducing the need for Dawn supply purchases.

Diversions are used when contract capacity on a pipeline path can be repurposed to serve another delivery area more cost-effectively. For example, a contract with a receipt point of Empress may be used to acquire Empress supply, which is then delivered to a different delivery area than originally contracted, allowing access to lower-cost supply for another delivery area.

During the summer months of 2025 and 2027, the Empress to Union WDA capacity is diverted to Parkway on behalf of the Union NDA and Union EDA and then injected into storage using STS. This approach reduces Dawn purchases that would otherwise be necessary to meet storage requirements for those delivery areas.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.52, Tables 12

Preamble:

We would like to understand better the Option Evaluation and its usefulness to inform the reader as well as the provision of incremental demand over the recent years.

Question(s):

What is the basis for the percentage Average Cost/Customer Impact?

a) Using the Long-haul to EGI CDA, please present the determination of approximately 3%.

Response:

a) Please see Table 1 for the calculation of the approximately 3% average cost per customer impact.

Table 1
Calculation of Typical Residential Customer Impact
Long-Haul to Enbridge CDA

Line No.	Particulars	Amount
		(a)
	Allocated Costs - Rate 1 ($000s) (1)	
1	Pipeline Peak	32
2	Pipeline Seasonal	205
3	Pipeline Annual	67,528
4	Total Costs	67,765
	Volumes – Rate 1 (10^3m^3)	
5	Annual Deliveries (2)	4,933,563
6	Annual Transportation Volumes WTS and Sales (3)	4,831,331
	Unit Rates ($/$10^3m^3$)	
7	Pipeline Peak (line 1 / line 5)	0.007
8	Pipeline Seasonal (line 2 / line 5)	0.041
9	Pipeline Annual (line 3 / line 6)	13.977
10	Total Unit Rate	14.025
11	Average Annual Impact per Customer ($) (4)	33.66
12	Rate 1 Total Annual Bill - April 2025 QRAM ($) (5)	$ 1,064.49
13	Typical Residential Customer Impact (%) (line 11 / line 12)	3.2%

Notes:
(1) Rate 1 allocation of $121.74 million total cost (EB-2025-0065, Table 12) using current approved cost allocation methodologies.
(2) EB-2025-0078, Exhibit C, Tab 4, Schedule 4, p.2, column 2, line 5.1
(3) EB-2025-0078, Exhibit C, Tab 4, Schedule 4, p.2, column 2, line 7.1
(4) Line 10 * $2400m^3$ / 1000
(5) EB-2025-0078, Exhibit F, Tab 1, Schedule 1, Appendix D, p. 1, column (c), line 6.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.52, Tables 12

Preamble:

We would like to understand better the Option Evaluation and its usefulness to inform the reader as well as the provision of incremental demand over the recent years.

Question(s):

Please provide, in tabular form, the demands in the Enbridge CDA for each year from 2020 to 2024 and any and all incremental supply contracted to meet those demands post-2020.

Response:

Please see Table 1.

Table 1
Enbridge CDA Demand Forecast and Incremental Transportation Capacity

Line No.	Particulars	2020/21	2021/22	2022/23	2023/24	2024/25
1	Annual Demand (TJ)	397,432	392,146	399,823	393,717	398,339
2	Design Day Demand (TJ/d)	3,329	3,341	3,360	3,378	3,578
3	Incremental Transportation Capacity	None	100,000 GJ/d with TCPL, Parkway to Enbridge CDA 21,101 GJ/d with Vector Pipeline, Chicago to Dawn[1]	None	None	18,876 GJ/d with TCPL, Parkway to Enbridge CDA, and associated Dawn Parkway capacity 34,457 GJ/d with TCPL, Empress to Enbridge CDA 121,142 GJ/d with Third-Party Assignment November to March, Niagara to Enbridge CDA

[1] This capacity is contracted for the EGD rate zone, including the Enbridge CDA, and delivered to Dawn.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.58, Tables 17 & 18

Preamble:

We would like to understand EGI's Supply Options better.

Question(s):

In coming to the end of the delivery areas, we noticed that the options did not provide information regarding Union WDA. Please provide the options analysis for the WDA.

a) Please provide an evaluation of using winter Short Term Firm Transport (STFT) to the WDA as part of the supply mix for peak day.

b) Please describe how EGI assesses the opportunity to use Storage Transportation Service (STS) to meet peak day requirements in the:
    i) WDA
    ii) NDA
    iii) NCDA
    iv) EDA

Response:

Enbridge Gas's Design Day Supply/Service Option Analysis calculates annual cost impacts based upon contracting for sufficient capacity/services for five years to resolve forecasted design day shortfall(s) for each delivery area during the five-year forecast

period (2024/25 to 2029/30). No design day shortfall is forecasted for the Union WDA[1] during the forecast period. Accordingly, no formal assessment of supply/service options for the WDA was needed. Notwithstanding the fact that there is no design day shortfall forecasted for the WDA, Enbridge Gas has provided Tables 1 and 2 to show the supply/service options available to the WDA, including Short Term Firm Transport (STFT).

Table 1
Union WDA Supply/Service Options

Option	Option Details				
	Provider(s)	Service	Receipt Point	Transfer Point	Delivery Point
Long-haul	TCPL	FT-LH	Empress	-	Union WDA
Long-haul	TCPL	STFT	Empress	-	Union WDA
Short-haul: D-P	EGI + TCPL	D-P + FT-SH	Dawn	Parkway	Union WDA
Great Lakes	GLGT + TCPL	FT	SE Michigan	Emerson II	Union WDA
Third-Party	Market Participants	Peaking, Del Serv	Union WDA	-	Union WDA

Table 2
Union WDA Supply/Service Option Evaluation

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul (FT)	➲	➲	➲	N/A	N/A	Yes[2]
Long-haul (STFT)	➲	ⓘ	➲	N/A	N/A	Yes
Short-haul: D-P	➲	➲	ⓘ	N/A	N/A	No
Great Lakes	➲	➲	ⓘ	N/A	N/A	No
Third-Party	➲	ⓘ	ⓘ	N/A	N/A	Unknown

a) STFT is an inferior supply alternative compared to firm transportation (FT) capacity considering differences in the service attributes and costs of each. In terms of service attributes, unlike FT capacity, STFT does not provide diversion rights (lack of flexibility), access to alternate receipt points (lack of flexibility), or renewal rights (renewal risk). All services are regularly leveraged by Enbridge Gas to adjust to changes in market demands, providing value to ratepayers. In terms of cost, TCPL sets bid floors for short term services like STFT that can far exceed the FT demand

[1] EB-2025-0065, p.27, Table 5.
[2] TransCanada only offers capacity through an annual open season. Capacity was last offered in the July 2025 ECOS https://www.tccustomerexpress.com/assets/2025%20ECOS%20Posting.pdf

tolls to be awarded capacity (price risk). For example, TCPL's current STFT offering[3] has a bid floor of 1190% for Empress to Union WDA capacity effective December 1, 2025. This means that in order to secure STFT capacity Enbridge Gas commencing December 2025, Enbridge Gas would have to bid no less than 1190% of the TCPL FT Demand toll to potentially be awarded capacity (although competing bidders could outbid Enbridge Gas at that level). The discounted Mainline Rate Rider is also not applicable to STFT services.

b) STS is a service on the TransCanada Mainline that provides transportation to and from storage (at Dawn) in conjunction with long-haul FT service. Enbridge Gas uses contracted STS volumes to meet design day demands. On a seasonal basis, STS allows for firm long-haul injections to be delivered to storage during the summer (when demand is typically lower) and firm withdrawals from storage during the winter (when market demand is typically higher). STS withdrawals help supplement Enbridge Gas's long-haul FT deliveries to meet design day requirements. STS allows for pooling of contracted volumes in the Union North rate zone, meaning that STS volumes not used in certain Union North delivery areas can be redirected and used in another Union North delivery area. Enbridge Gas uses pooling between the NDA and NCDA to maximize the usage of STS contracted volumes to serve Union North design day demands.

[3] https://www.tccustomerexpress.com/2864.html

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, p.84, Table 26

Preamble:

We would like to understand better the increasing Unutilized Capacity for Union South in the last few years.

Question(s):

Please provide the amount of Unutilized Capacity for Union South for each of the three years prior to 2021/22.

a) Please clarify if amounts shown are net of or include amounts of transport that were assigned to third parties to mitigate the cost of unutilized.

b) For each of the last 6 years, please identify the quantities by pipeline that were unutilized.

c) In an Excel spreadsheet in the following format (see below), for each year by pipeline, provide the costs associated with gas supply from that pipeline by including the incremental cost associated with the unutilized capacity.

Year	Pipeline	Amount of Commodity Delivered	Unit Cost of Landed Commodity	Amount of Unutilized Capacity	Total Cost of Unutilized Capacity	Unit Cost of Commodity including Unutilized
		(TJ)	($/GJ)	(TJ)	($)	($/GJ)

d) Please provide a similar table for other delivery areas.

Response:

While completing this response, Enbridge Gas discovered an error in the 5-Year Gas Supply Plan, Table 26, which has been corrected. An updated version of Table 26 will be filed under separate cover. There are no other aspects of the Company's pre-filed evidence impacted by this error and its subsequent correction.

The utilized capacity for the three years prior to 2021/22 is shown in Table 1 which was taken from the 2022 Annual Update[1].

Table 1

2018/19 to 2022/21 – Actual vs. Plan Unutilized Capacity

		2018/19 Annual			2019/20 Annual			2020/21 Annual		
Line No	Particulars (PJ)	Actual	Update	Variance	Actual	Update	Variance	Actual	Update	Variance
1	North West	1.4	14.4	(13.0)	5.7	8.4	(2.7)	6.0	8.4	(2.5)
2	North East	0.9	4.3	(3.4)	4.4	7.1	(2.7)	3.0	7.1	(4.2)
3	South		-	-	16.7	-	16.7	19.6	-	19.6
4	Total UDC	2.3	18.7	(16.4)	26.9	15.6	11.3	28.5	15.6	13.0

a-d) The unutilized capacity shown in Table 26 of the updated 5-Year Gas Supply Plan, includes transportation capacity released to third parties to mitigate costs incurred.

Please see Attachment 1 for the specific pipeline information requested in the question. Enbridge Gas has prepared the information requested on a best-efforts basis using assumptions where necessary. Enbridge Gas declines to provide the unutilized capacity by pipeline prior to 2021/22 as the request falls outside of the scope of the Framework requirement.

[1] EB-2022-0072.

3-Year Unutilized Capacity History - Union North West

Line No.	Pipeline	Amount of Commodity Delivered (TJ)	Unit Cost of Landed Commodity (1) ($/GJ)	Amount of Unutilized Capacity (2) (TJ)	Total Net Cost of Unutilized Capacity (3) ($)	Unit Cost of Commodity Including Unutilized ($/GJ)
	(a)	(b)	(c)	(d)	(e)	(f)
	2021/22					
1	TCPL	22,831.4	6.67	5,972.0	224,559	6.68
	2022/23					
2	TCPL	24,377.4	5.14	4,034.0	732,827	5.17
	2023/24					
3	TCPL	20,683.1	2.60	9,080.5	289,240	2.61

Notes:

(1) Cost of landed commodity includes commodity and upstream transportation costs.

(2) Amount of unutilized capacity includes the actual 2023/24 unutilized capacity to be filed in the 2024 Disposition of Deferral and Variance Account Balance proceeding (EB-2025-0155).

(3) Cost is net of proceeds received from pipeline releases.

3-Year Unutilized Capacity History - Union North East

Line No.	Pipeline	Amount of Commodity Delivered (TJ)	Unit Cost of Landed Commodity (1) ($/GJ)	Amount of Unutilized Capacity (2) (TJ)	Total Net Cost of Unutilized Capacity (3) ($)	Unit Cost of Commodity Including Unutilized ($/GJ)
	(a)	(b)	(c)	(d)	(e)	(f)
	2021/22					
1	TCPL	24,895.9	8.13	1,582.3	499,375	8.15
2	NEXUS	18,612.5	8.47	348.4	215,642	8.48
3	Total			1,930.7		
	2022/23					
4	TCPL	25,000.0	5.41	4,245.2	1,329,932	5.46
5	NEXUS	19,015.1	4.85	415.6	497,677	4.88
6	Total			4,660.8		
	2023/24					
7	TCPL	16,434.1	3.38	11,467.2	3,328,741	3.59
8	NEXUS	18,372.1	3.85	910.5	1,169,853	3.91
9	Total			12,377.8		

Notes:

(1) Cost of landed commodity includes commodity and upstream transportation costs, including STS costs.

(2) Amount of unutilized capacity includes the actual 2023/24 unutilized capacity to be filed in the 2024 Disposition of Deferral and Variance Account Balance proceeding (EB-2025-0155).

(3) Cost is net of proceeds received from pipeline releases.

3-Year Unutilized Capacity History - Union South

Line No.	Pipeline	Amount of Commodity Delivered (TJ)	Unit Cost of Landed Commodity (1) ($/GJ)	Amount of Unutilized Capacity (2) (TJ)	Total Net Cost of Unutilized Capacity (3) ($)	Unit Cost of Commodity Including Unutilized ($/GJ)
	(a)	(b)	(c)	(d)	(e)	(f)
	2021/22					
1	Dawn	33,736.2	7.44	4,074.2	-	7.44
2	Great Lake	8,765.3	6.87	14.1	11,772	6.87
3	NEXUS	37,434.5	8.44	672.8	402,055	8.45
4	PEPL	19,888.6	8.78	2,111.0	1,741,979	8.87
5	Vector	35,908.4	8.16	1,941.3	369,215	8.17
6	Total			8,813.4		
	2022/23					
7	Dawn	28,306.2	4.44	9,028.5	-	4.44
8	Great Lake	8,806.3	5.00	0.7	813	5.00
9	NEXUS	33,644.1	4.90	831.2	995,381	4.93
10	PEPL	17,255.0	5.45	4,696.1	3,509,220	5.65
11	Vector	30,926.2	4.69	4,021.7	775,190	4.71
12	Total			18,578.2		
	2023/24					
13	Dawn	22,387.4	2.71	20,426.8	-	2.72
14	Great Lake	8,683.5	2.50	161.1	183,801	2.52
15	NEXUS	36,842.2	3.83	1,790.0	2,297,312	3.89
16	PEPL	18,350.7	3.33	3,660.6	2,137,533	3.44
17	Vector	30,186.0	2.89	8,492.4	1,460,680	2.94
18	Total			34,530.7		

Notes:

(1) Cost of landed commodity includes commodity and upstream transportation costs.

(2) Amount of unutilized capacity includes the actual 2023/24 unutilized capacity to be filed in the 2024 Disposition of Deferral and Variance Account Balance proceeding (EB-2025-0155).

(3) Cost is net of proceeds received from pipeline releases.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

2025 GSP, Appendix D, p. 8

Preamble:

ICF's Approach contains: *The objective function in the model optimizes total net economic benefit, that is, consumers' and producers' surplus minus costs. Model optimization has several constraints, equations representing physical limits of production, storage and transmission capacity and a series of "balance equations" that ensure that supply and demand are equal at each node.*

Question(s):

Please provide a forecast of the amount of capacity that may be available (through expiring contracts) of pipelines into Ontario over the next 5 years?

Response:

Enbridge Gas does not maintain a forecast of potentially available pipeline capacity for each of the upstream pipelines delivering gas supply into Ontario. Further, it is not reasonably possible to estimate the amount of capacity that may be available on each of those pipelines over the next five years with any certainty as such decisions are made at the sole discretion of each holder of upstream pipeline capacity and is dependent upon a wide variety of factors, including but not limited to their respective customer contracts types (i.e., renewal rights), customer demands, market opportunities, operations, and regulatory environments. Expansion of upstream pipeline capacity requires long-term supporting contracts, regulatory approvals and the support of pipeline companies to deploy the required investment capital.

Given the scarcity of upstream pipeline capacity discussed at length in the Company's 5-Year Gas Supply Plan and in response to related interrogatories,[1] Enbridge Gas does not expect a material volume of pipeline capacity into Ontario to become available over the next five years. Further, as discussed in response at Exhibit I.2-FRPO-15, the Company expects that any such capacity becoming available will be in high demand, potentially resulting in higher negotiated tolls being paid and/or extended contract terms being committed for that capacity.

[1] EB-2025-0065, pp.29-31, Appendix A; Exhibit I.2-STAFF-5; Exhibit I.2-STAFF-6, part b).

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

EB-2024-0067 Revised Transcript Stakeholder Conference, p.161-171

Preamble:

In the above referenced Stakeholder Conference, we were trying to obtain an understanding of how EGI arranges for its purchase of gas for the Vector pipeline while mitigating risk given the volatility and pricing in the Chicago market. We would like to ensure that the Board has clarity on EGI's practice. For the following questions, we ask that EGI confirm or clarify its approach to these transactions and provides comparison of the result with Dawn purchases.

Question(s):

Our understanding is that EGI arranges for the purchase of gas at Chicago up to a year in advance for future months initially at a Chicago index price. Please confirm or clarify.

a) At some point within the year, EGI fixes the indexed price relative to NYMEX (index plus basis between NYMEX and Chicago) for particularly volatile months like January and February. Please confirm or clarify.

b) This approach means that customers do not experience the gas prices in the cash market when future risk premiums collapse. Please confirm or clarify.

c) By locking in the basis, ratepayers are notionally buying insurance at a premium to avoid a Chicago market price spike. Please confirm or clarify.

d) That premium would be paid on all gas contracted for whether that gas makes it to Ontario or not given the company's asset management agreements. Please confirm or clarify.

Response:

Not confirmed. Enbridge Gas typically procures gas supply at Chicago on either a seasonal or monthly basis, often less than one and typically no more than two months prior to the start of deliveries allowing the Company to more closely monitor market conditions and adjust planned purchases in response to price volatility.

a) Enbridge Gas fixes a basis price relative to NYMEX or Chicago Gas Daily Index for summer purchases at Chicago. To mitigate winter season price volatility Enbridge Gas has been entering into seasonal Asset Management Agreements (AMAs) wherein counterparties supply gas at a basis price tied to NYMEX, which reflects the projected seasonal cost of gas supply at the Dawn Hub. These counterparties are allocated Enbridge Gas's U.S. Vector capacity and are obligated to deliver equivalent volumes of gas supply to St. Clair on a firm basis throughout the winter. Since St. Clair is not a liquid trading hub, it would not otherwise be a viable point of purchase for Enbridge Gas. These AMAs enable Enbridge Gas to ensure reliable deliveries to the Sarnia Industrial Line (SIL) while minimizing ratepayer risk exposure to any Chicago price volatility.

b-d) As previously discussed, Enbridge Gas typically purchases seasonal gas supply at Chicago within one to two months prior to the commencement of deliveries. Similarly, Enbridge Gas procures about half (50%) of its planned summer Chicago gas supply volumes as prompt month contract terms, meaning that it typically contracts for next month gas supply within days/weeks of the commencement of deliveries. Procuring gas supply at Chicago in this manner allows the Company to benefit from reductions in any future month price premiums (as the gap between futures contract and day-ahead contract terms narrows) and to adjust planned purchases to avoid price volatility (and premiums) observed (including by delaying or avoiding certain planned purchases). Further, when Enbridge Gas fixes a basis price relative to NYMEX or Chicago Gas Daily Index for purchases at Chicago, it is only the (relatively minor) basis portion of that gas supply price that is fixed, not the index-related portion (e.g., NYMEX or Chicago Gas Daily Index). Accordingly, most of the total gas supply cost remains fluid, fluctuating daily based on broader market conditions and economic fundamentals and ultimately reflecting fair market value. In other words, only if Enbridge Gas took the risk of purchasing fixed price gas supply at Chicago (which the Company does not do) would ratepayers be fully at risk of paying a premium should market prices subsequently fall.

Additionally, as discussed in part a), Enbridge Gas has been entering into seasonal AMAs at a basis price tied to NYMEX and closely reflecting the forecasted seasonal cost of gas supply at the Dawn Hub, further minimizing ratepayer risk exposure to any Chicago price volatility. Collectively, these strategies have resulted in actual Vector (Chicago) prices below forecasted futures prices and at a discount to Dawn

prices (avoiding any price premiums), as detailed in the Company's 5-Year Gas Supply Plan at Appendix I.

Please also see response at Exhibit I.2-CCC-7, for additional discussion and context regarding the evolution of ICF's analysis of Chicago natural gas prices, including its views regarding the strategic value of sourcing gas supply from Chicago and that the risk premium in futures pricing for Chicago relative to Dawn would gradually decline. Enbridge Gas explains in that response that current market conditions appear to support ICF's conclusions regarding day-ahead pricing and a longer-term decline in futures risk premium for Chicago relative to Dawn.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

EB-2024-0111 Exhibit N Tab 1 Schedule 1 Page 23, Item 11

Preamble:

In the above questions about the Chicago market, we have requested clarification to understand how EGI manages the price risk in the Chicago market primarily in the winter. Agreements in the above referenced items includes:

> *Among other things, Enbridge Gas will agree to consider the use of forward contracts for winter gas purchases, though it will not commit to the use of that approach.*
>
> *Enbridge Gas agrees that in total it will need to explain and justify the prudence of its load balancing costs. This will be done as part of annual deferral and variance account disposition applications*

Considering the agreements between EGI and ratepayer representatives in the above reference and our pursuit of EGI fixing the cost of gas of some of these purchases well in advance of the winter, we would like to understand better how EGI plans to manage the risks on behalf of ratepayers and evaluate the efficacy going forward. To clarify, when we state some of these purchases, we suggest that EGI could do a sensitivity analysis using historical weather to derive a minimum amount of purchased gas to support storage levels in a warm winter to allow a fixing of the price of that component.

Question(s):

Please provide EGI's views on mitigating the price risk of load balancing by fixing the price of an amount of gas determined by assessing warm winters (to mitigate the volume risk).

a) Please provide EGI views on dividing that minimum amount across the key months of December to March.

b) Please provide EGI's views on further dividing the amount to be fixed into certain quantities that would allow a fixing of the price at intervals 12, 9, 6 and 3 months ahead of the winter.

c) Please describe how EGI will report on delivered gas at Dawn, which will separate:
   i) Purchases fixed in advance of the winter
   ii) Planned purchases from the Gas Supply plan which were not fixed ahead of the winter
   iii) Purchases made in response to colder than forecast weather that are deemed to be necessary to maintain targeted storage levels.

Response:

FRPO's question pre-maturely seeks to explore load balancing matters in the current 5-Year Gas Supply Plan proceeding despite the fact that parties agreed, and the OEB accepted, that those issues should be reported on as part of the Company's annual deferral and variance account disposition proceedings going forward.

As referenced by FRPO in its own preamble,[1] in the 2024 Rebasing Phase 2 Settlement Agreement, Enbridge Gas agreed to report annually on the market-based load balancing purchases it makes (including the prices of alternatives) as part of its annual deferral and variance account disposition applications. The purpose of this reporting is to support the prudence of its load balancing decisions and related costs. The OEB subsequently approved the 2024 Rebasing Phase 2 Settlement Agreement on November 29, 2024.

As agreed by all parties to the 2024 Rebasing Phase 2 Settlement Agreement, Enbridge Gas will be prepared to report on its load balancing decisions and costs, including the proportion and timing of fixed vs. indexed purchases made, and any supporting analysis completed as part of its 2025 Deferral and Variance Account Disposition evidence and proceeding to be filed in 2026.

For these reasons, Enbridge Gas respectfully declines to respond to FRPO's questions.

[1] EB-2024-0111, Exhibit N, Tab 1, Schedule 1, pp.23-24.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

EB-2023-0072 – EGI 2023 Annual Update to 5 Year GSP Responses to Written Questions & Updated Gas Supply Plan, Exhibit I.FRPO.14, Attach. 4

Preamble:

In the above reference, EGI provided a comparison of the total cost of deliveries on Vector to the Dawn price available on a monthly basis. We would like to understand the actual results of the above questions regarding establishing gas price from Chicago in the last couple of years.

Question(s):

Please extend the analysis in the above reference starting November 2022 to March of 2025 while providing the total for each annual cycle & the final winter.

Response:

Please see Attachment 1 for an updated version of the referenced comparison, including data to March 2025.

2021 - 2022 Vector Cost Comparison by Month

Month	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Winter Total	Annual Total
	30	31	31	28	31	30	31	30	31	31	30	31		
Fuel ratio	0.40%	0.45%	0.95%	1.22%	1.00%	0.73%	0.60%	0.85%	0.55%	0.80%	0.70%	0.70%		
Supply Purchased in Chicago (MMBtu/d) (1)	40,000	40,000	40,000	40,000	40,000	40,000	40,000	40,000	20,000	20,000	20,000	20,000		
Chicago Supply Cost ($US/MMBtu) (1)	$ 6.38	$ 5.64	$ 4.26	$ 6.48	$ 4.81	$ 5.10	$ 7.05	$ 8.77	$ 6.36	$ 8.49	$ 9.14	$ 6.66		
Fuel cost ($US/MMBtu)	$ 0.03	$ 0.03	$ 0.04	$ 0.08	$ 0.05	$ 0.04	$ 0.04	$ 0.08	$ 0.04	$ 0.07	$ 0.06	$ 0.05		
Total Chicago Supply Cost ($US/MMBtu)	$ 6.41	$ 5.66	$ 4.30	$ 6.56	$ 4.86	$ 5.13	$ 7.09	$ 8.85	$ 6.39	$ 8.56	$ 9.21	$ 6.71		
Dawn price ($US/MMBtu)	$ 5.66	$ 5.41	$ 4.00	$ 5.92	$ 4.62	$ 5.56	$ 6.94	$ 8.27	$ 7.13	$ 8.28	$ 8.47	$ 6.06		
Supply cost differential ($US)	$ 900,760	$ 310,146	$ 380,062	$ 723,734	$ 289,373	$ (514,047)	$ 184,127	$ 691,113	$ (455,021)	$ 170,956	$ 444,054	$ 403,700	**$ 2,604,076**	**$ 3,528,958**
Transportation Demand Charges ($US)	$ 192,000	$ 198,400	$ 198,400	$ 179,200	$ 198,400	$ 192,000	$ 198,400	$ 192,000	$ 198,400	$ 198,400	$ 192,000	$ 198,400	**$ 966,400**	**$ 2,336,000**
Capacity released for UDC mitigation (MMBtu/d)	-	-	-	-	-	-	-	-	-	-	-	-		
Capacity released for purchase relocation (MMBtu/d)	-	-	-	-	-	-	-	-	20,000	20,000	20,000	20,000		
Capacity released for AMA, supply still purchased in Chicago (MMBtu/d) (1)	40,000	40,000	40,000	40,000	40,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000		
UDC Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Purchase Relocation Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 15,000	$ 15,652	$ 10,000	$ 11,000	**$ -**	**$ 51,652**
AMA Capacity release value ($US)	$ 146,320	$ 149,919	$ 149,919	$ 139,120	$ 149,919	$ 38,325	$ 38,325	$ 38,325	$ 38,325	$ 38,325	$ 38,325	$ 38,325	**$ 735,198**	**$ 1,003,473**
Capacity release value ($US)	$ 146,320	$ 149,919	$ 149,919	$ 139,120	$ 149,919	$ 38,325	$ 38,325	$ 38,325	$ 53,325	$ 53,977	$ 48,325	$ 49,325	**$ 735,198**	**$ 1,055,125**
Total cost of capacity vs. Dawn purchase ($US)	$ 946,440	$ 358,627	$ 428,542	$ 763,814	$ 337,854	$ (360,372)	$ 344,202	$ 844,788	$ (309,946)	$ 315,379	$ 587,729	$ 552,775	**$ 2,835,278**	**$ 4,809,833**
Total cost of capacity vs. Dawn purchase ($Cdn)	$ 1,189,657	$ 458,831	$ 540,627	$ 971,251	$ 427,652	$ (455,077)	$ 442,378	$ 1,082,477	$ (401,142)	$ 407,523	$ 782,773	$ 757,274	**$ 3,588,018**	**$ 6,204,225**

Source for Assumptions:

Supply Cost	Actual transacted supply cost including fuel requirements where applicable
Transportation Tolls	Actual contracted tolls
Foreign Exchange rate	Monthly Average from Bank of Canada
Energy conversions	1 MMBtu = 1.055056 GJ

2022 - 2023 Vector Cost Comparison by Month

Month	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Winter Total	Annual Total
	30	31	31	28	31	30	31	30	31	31	30	31		
Fuel ratio	0.30%	0.80%	0.63%	0.60%	0.30%	0.70%	0.60%	0.45%	0.23%	0.65%	0.10%	0.29%		
Supply Purchased in Chicago (MMBtu/d) (1)	40,000	40,000	40,000	40,000	40,000	40,000	40,000	-	-	-	20,000	20,000		
Chicago Supply Cost ($US/MMBtu) (1)	$ 5.22	$ 6.74	$ 4.74	$ 3.14	$ 2.48	$ 1.93	$ 1.97	$ 2.02	$ 2.56	$ 2.33	$ 2.39	$ 2.60		
Fuel cost ($US/MMBtu)	$ 0.02	$ 0.05	$ 0.03	$ 0.02	$ 0.01	$ 0.01	$ 0.01	$ 0.01	$ 0.01	$ 0.02	$ 0.00	$ 0.01		
Total Chicago Supply Cost ($US/MMBtu)	$ 5.23	$ 6.80	$ 4.77	$ 3.16	$ 2.49	$ 1.94	$ 1.98	$ 2.03	$ 2.57	$ 2.34	$ 2.39	$ 2.61		
Dawn price ($US/MMBtu) (2)	$ 5.73	$ 6.64	$ 4.69	$ 3.16	$ 2.76	$ 2.38	$ 2.01	$ 2.01	$ 2.47	$ 2.19	$ 2.25	$ 2.63		
Supply cost differential ($US)	$ (593,798)	$ 190,088	$ 99,827	$ 1,931	$ (330,997)	$ (527,921)	$ (39,159)	$ -	$ -	$ -	$ 88,039	$ (11,495)	**$ (632,949)**	**$ (1,123,484)**
Transportation Demand Charges ($US)	$ 192,000	$ 198,400	$ 198,400	$ 179,200	$ 198,400	$ 192,000	$ 198,400	$ 192,000	$ 198,400	$ 198,400	$ 192,000	$ 198,400	**$ 966,400**	**$ 2,336,000**
Capacity released for UDC mitigation (MMBtu/d)	-	-	-	-	-	-	-	40,000	40,000	20,000	-	20,000		
Capacity released for purchase relocation (MMBtu/d)	-	-	-	-	-	-	-	-	-	20,000	20,000	-		
Capacity released for AMA, supply still purchased in Chicago (MMBtu/d) (1)	-	-	-	-	-	-	-	-	-	-	-	-		
UDC Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 12,400	$ 33,480	$ 9,200	$ -	$ 7,750	**$ -**	**$ 62,830**
Purchase Relocation Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 9,920	$ 11,404	$ -	**$ -**	**$ 21,324**
AMA Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 12,400	$ 33,480	$ 19,120	$ 11,404	$ 7,750	**$ -**	**$ 84,154**
Total cost of capacity vs. Dawn purchase ($US)	$ (401,798)	$ 388,488	$ 298,227	$ 181,131	$ (132,597)	$ (335,921)	$ 159,241	$ 179,600	$ 164,920	$ 179,280	$ 268,635	$ 179,155	**$ 333,451**	**$ 1,128,362**
Total cost of capacity vs. Dawn purchase ($Cdn)	$ (540,378)	$ 528,033	$ 400,280	$ 243,621	$ (181,419)	$ (452,989)	$ 215,293	$ 238,652	$ 217,942	$ 241,759	$ 363,598	$ 245,748	**$ 450,137**	**$ 1,520,140**

Source for Assumptions:

Supply Cost	Actual transacted supply cost including fuel requirements where applicable
Transportation Tolls	Actual contracted tolls
Foreign Exchange rate	Monthly Average from Bank of Canada
Energy conversions	1 MMBtu = 1.055056 GJ

Note:

(1) "Chicago" represents St. Clair U.S. during winter months. Enbridge Gas contracted AMAs where counterparties use Enbridge Gas's U.S. Vector capacity to deliver firm gas volumes to St. Clair, a non-liquid interconnect.

(2) Enbridge Gas did not procure Dawn supply in April and October 2023. The Dawn price utilized is calculated as the average of the most recent actual prices preceding and following those months.

2023 - 2024 Vector Cost Comparison by Month

Month	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Winter Total	Annual Total
	30	31	31	29	31	30	31	30	31	31	30	31		
Fuel ratio	0.61%	0.45%	0.85%	1.18%	0.75%	0.90%	0.90%	0.50%	0.30%	0.40%	0.14%	0.30%		
Supply Purchased in Chicago (MMBtu/d) (1)	40,000	40,000	40,000	40,000	40,000	20,000	20,000	-	-	-	-	-		
Chicago Supply Cost ($US/MMBtu) (1)	$ 3.05	$ 2.59	$ 2.50	$ 2.38	$ 1.50	$ 1.40	$ 1.67	$ 1.86	$ 1.68	$ 1.69	$ 1.92	$ 1.99		
Fuel cost ($US/MMBtu)	$ 0.02	$ 0.01	$ 0.02	$ 0.03	$ 0.01	$ 0.01	$ 0.02	$ 0.01	$ 0.01	$ 0.01	$ 0.00	$ 0.01		
Total Chicago Supply Cost ($US/MMBtu)	$ 3.07	$ 2.60	$ 2.53	$ 2.40	$ 1.51	$ 1.41	$ 1.68	$ 1.87	$ 1.69	$ 1.70	$ 1.92	$ 1.99		
Dawn price ($US/MMBtu) (2)	$ 3.00	$ 2.52	$ 2.44	$ 2.35	$ 1.47	$ 1.68	$ 1.68	$ 1.90	$ 2.16	$ 1.87	$ 1.57	$ 2.02		
Supply cost differential ($US)	$ 77,607	$ 98,576	$ 102,413	$ 59,971	$ 52,302	$ (161,598)	$ 794	$ -	$ -	$ -	$ -	$ -	**$ 390,868**	**$ 230,065**
Transportation Demand Charges ($US)	$ 192,000	$ 198,400	$ 198,400	$ 185,600	$ 198,400	$ 192,000	$ 198,400	$ 192,000	$ 198,400	$ 198,400	$ 192,000	$ 198,400	**$ 972,800**	**$ 2,342,400**
Capacity released for UDC mitigation (MMBtu/d)	-	-	-	-	-	20,000	20,000	20,000	20,000	40,000	20,000	20,000		
Capacity released for purchase relocation (MMBtu/d)	-	-	-	-	-	-	-	20,000	20,000	-	20,000	20,000		
Capacity released for AMA, supply still purchased in Chicago (MMBtu/d) (1)	-	-	-	-	-	-	-	-	-	-	-	-		
UDC Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ 39,002	$ 25,000	$ 23,000	$ 15,000	$ 74,484	$ 24,200	$ 16,200	**$ -**	**$ 216,886**
Purchase Relocation Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 20,000	$ 12,420	$ -	$ 12,000	$ 14,000	**$ -**	**$ 58,420**
AMA Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	$ 39,002	$ 25,000	$ 43,000	$ 27,420	$ 74,484	$ 36,200	$ 30,200	**$ -**	**$ 275,306**
Total cost of capacity vs. Dawn purchase ($US)	$ 269,607	$ 296,976	$ 300,813	$ 245,571	$ 250,702	$ (8,600)	$ 174,194	$ 149,000	$ 170,980	$ 123,916	$ 155,800	$ 168,200	**$ 1,363,668**	**$ 2,297,159**
Total cost of capacity vs. Dawn purchase ($Cdn)	$ 369,604	$ 398,868	$ 403,841	$ 331,545	$ 339,426	$ (11,759)	$ 238,124	$ 204,234	$ 234,448	$ 169,170	$ 211,047	$ 231,359	**$ 1,843,284**	**$ 3,119,907**

Source for Assumptions:

Supply Cost	Actual transacted supply cost including fuel requirements where applicable
Transportation Tolls	Actual contracted tolls
Foreign Exchange rate	Monthly Average from Bank of Canada
Energy conversions	1 MMBtu = 1.055056 GJ

Note:

(1) "Chicago" represents St. Clair U.S. during winter months. Enbridge Gas contracted AMAs where counterparties use Enbridge Gas's U.S. Vector capacity to deliver firm gas volumes to St. Clair, a non-liquid interconnect.

(2) Enbridge Gas did not procure Dawn supply in April and October 2023. The Dawn price utilized is calculated as the average of the most recent actual prices preceding and following those months.

2024 - March 2025 Vector Cost Comparison by Month

Month	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Winter Total	Total
	30	31	31	28	31		
Fuel ratio	0.27%	0.80%	0.83%	0.45%	0.66%		
Supply Purchased in Chicago (MMBtu/d) (1)	40,000	40,000	40,000	40,000	40,000		
Chicago Supply Cost ($US/MMBtu) (1)	$ 2.07	$ 2.93	$ 3.24	$ 3.26	$ 3.63		
Fuel cost ($US/MMBtu)	$ 0.01	$ 0.02	$ 0.03	$ 0.01	$ 0.02		
Total Chicago Supply Cost ($US/MMBtu)	$ 2.08	$ 2.95	$ 3.27	$ 3.28	$ 3.66		
Dawn price ($US/MMBtu)	$ 2.03	$ 2.94	$ 3.32	$ 3.89	$ 3.72		
Supply cost differential ($US)	$ 57,045	$ 18,857	$ (71,681)	$ (692,193)	$ (85,414)	**$ (773,386)**	**$ (773,386)**
Transportation Demand Charges ($US)	$ 192,000	$ 198,400	$ 198,400	$ 179,200	$ 198,400	**$ 966,400**	**$ 966,400**
Capacity released for UDC mitigation (MMBtu/d)	-	-	-	-	-		
Capacity released for purchase relocation (MMBtu/d)	-	-	-	-	-		
Capacity released for AMA, supply still purchased in Chicago (MMBtu/d) (1)	-	-	-	-	-		
UDC Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Purchase Relocation Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
AMA Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Capacity release value ($US)	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**
Total cost of capacity vs. Dawn purchase ($US)	$ 249,045	$ 217,257	$ 126,719	$ (512,993)	$ 112,986	**$ 193,014**	**$ 193,014**
Total cost of capacity vs. Dawn purchase ($Cdn)	$ 348,041	$ 309,374	$ 182,348	$ (733,632)	$ 162,237	**$ 268,368**	**$ 268,368**

Source for Assumptions:

Supply Cost	Actual transacted supply cost including fuel requirements where applicable
Transportation Tolls	Actual contracted tolls
Foreign Exchange rate	Monthly Average from Bank of Canada
Energy conversions	1 MMBtu = 1.055056 GJ

Note:

(1) "Chicago" represents St. Clair U.S. during winter months. Enbridge Gas contracted AMAs where counterparties use Enbridge Gas's U.S. Vector capacity to deliver firm gas volumes to St. Clair, a non-liquid interconnect.

ENBRIDGE GAS INC.

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

Interrogatory

Issue:

2

Reference:

APPENDIX I

Question(s):

Please provide a full description of how values in the table were determined including all sources of data used.

Response:

Calculation of Actual Costs

The actual premium/(discount) presented in Appendix I was derived from aggregating the total actual costs incurred by Enbridge Gas for each supply path, including actual exchange rates, commodity charges, transportation demand fees, and fuel costs. These total actual costs were then divided by the total volumes for each path to determine a total actual cost unit rate in CAD/GJ of the supply path. The premium or discount is calculated as the total actual cost unit rate relative to the comparator supply option for the path over the specified time period (gas year).

Assumptions made and data sources used to complete calculation of actual costs included:

- Only commodity costs were used when comparing paths to Dawn. However, additional short-haul pipeline capacity could be required to deliver Dawn supply to any specific delivery area.
- The actual costs were based on the past 3 years of full (gas year) actuals data.

Calculation of Landed Cost Analyses

Forecasted landed cost premiums and discounts were derived from landed cost analyses that were completed and subsequently filed as part of Annual Updates from 2020 to 2024 (e.g., 2023 would be a landed cost analysis completed during 2023 for decisions covered in the 2024 Annual Update). Each premium or discount is reflected in the time period (gas year) for which the related landed cost forecast applied.

Assumptions made and data sources used to complete landed cost analyses included:

- Landed cost analyses incorporate the most up-to-date Bank of Canada exchange rates and transportation demand charges at the time the analysis was completed.
- Forecasted commodity prices are sourced from ICF's latest market forecasts at the time the analysis was completed.
- Fuel ratios are calculated using the average of actual historical fuel usage data from the previous year.
- In cases where multiple landed cost analyses were available for the same forecast period (gas year), the values were averaged across overlapping timeframes to ensure consistency and comparability.
- For AECO, as multiple contract terms were considered (i.e., 1-year, 3-year, or 5-year) and differentiated by an escalating toll discount for longer terms. The term that was ultimately contracted is reflected in the landed cost forecast.

Please see response at Exhibit I.2-CCC-9, Attachment 1 for an updated version of Appendix I.

Please see response at Exhibit I.1-FRPO-1 for further explanation regarding the calculation of landed cost analyses.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

2

Reference:

Enbridge indicates that the Company's gas supply planning principles and practices are [page 5]:

- Cost-effectiveness and
- Reliability and security of supply

Enbridge further notes that the OEB Framework requires use of the following Guiding Principles for planning gas supply.

- Cost-effectiveness and
- Reliability and security of supply
- Public Policy

Question(s):

a) Please provide a copy of the Company's gas supply planning principles and practices document as noted above.

b) Please explain why Enbridge's gas supply planning principles and practices specifically note only two of the three principles from the OEB's list. Also, is Enbridge able to commit to add Public Policy to its internal gas supply planning principles and practices? If not, please explain why not.

Response:

a) Please see response at Exhibit I.1-SEC-1, Attachment 1 for Enbridge Gas's Gas Supply Procurement Policies and Practices manual.

b) As stated in the 5-Year Gas Supply Plan, Enbridge Gas's gas supply planning principles are aligned with all of the OEB's Guiding Principles. The Company's principles provide a company-specific interpretation of how both of the OEB's Guiding Principles of cost-effectiveness and reliability and security of supply are practically applied by Enbridge Gas. Where public policy is prescriptive and relevant to gas supply planning, then it is considered and reflected in the gas supply plan. However, it is not consistently relevant or applicable to most or all gas supply decisions in the same way as the cost-effectiveness and reliability and security of supply. As such, public policy is not included as a separate Enbridge Gas gas supply planning principle.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

2

Reference:

The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system).

Question(s):

a) Please provide the energy transition adjustments applied and for each ET adjustment applied, please indicate what percent forecast decrease this results in over the forecast timeline (per year and cumulative over the forecast period).

b) Please provide the reports and analysis that support each energy transition adjustments Enbridge is applying to the demand forecast.

c) Please confirm what Enbridge has included in the demand forecast adjustments due to the energy transition other than forecasted customer leaving the gas system.

d) Please provide details on the gas demand decrease Enbridge has included related to hybrid heating systems using natural gas as the backup option. If no adjustments have been included, please explain why not.

Response:

a-c) Enbridge Gas develops Energy Transition Adjustments (the Adjustments) based on the most up-to-date information available at the time of forecasting. Each year, Enbridge Gas conducts a review of external signals, such as energy policy signals, market trends, stakeholder feedback, and internal data to assess potential impacts on natural gas demand for Enbridge Gas's business and system planning over a 10-year forecast period. Enbridge Gas reviews the Adjustments annually and determines if changes are warranted based on the foregoing. While the Adjustments are developed over a 10-year forecast period, only the Adjustments from 2025 to

2030 of the 10-year forecast have been used to inform the submitted 5-Year Gas Supply Plan evidence.

Please see Attachment 1 which outlines the 2024 Adjustments applied to the demand forecast and the energy policies/signals considered when developing the Adjustments.

Please see Attachment 2 for the impacts of the Adjustments on Enbridge Gas's demand forecast, by rate zone and sector. Please note that Enbridge Gas does not apply the Adjustments to industrial general service customers. Please see response at Exhibit I.2-CME-1 for further explanation. Enbridge Gas has not shown the separate impact of the Adjustment applied to Customer Additions, as the Adjustment applied to Customer Additions is incorporated into the base existing customers forecast, and then the Egress Adjustment is layered onto this forecast, to develop the average number of customers forecast. This forecast is then used to derive the annual demand forecast seen in Table 1 of the pre-filed evidence.

Attachment 2 shows the impact of the Egress Adjustment on Enbridge Gas's average number of customers. Table 2 in Attachment 2 shows the impact of the Egress Adjustments on Enbridge Gas's annual demand. Table 3 in Attachment 2 shows the incremental impact to Table 2, of the Adjustment for average use (Toronto Green Standard), applied specifically for the City of Toronto, and the associated incremental impact to the Enbridge Gas annual demand. The impact of the Federal Carbon Charge is included in the average use methodology for deriving the volume forecasts.

d) Please see response at Exhibit I.4-BOMA-5.

ET Adjustment Factors

Topics of Cover

- ET Policy Signals Considered in ET Adjustment Process
- ET Adjustment Enhancements
- ET Adjustments For General Service Customer Forecasts:
  - New Construction
  - Conversions
  - Existing
- Impact of ET Adjustment for General Service Customers
- ET Adjustments for Design Hour

Energy Transition Signals Summary – Ontario

ENBRIDGE
Life Takes Energy

New Buildings

External Signals:

- No current policies from any level of government prevent natural gas in new buildings
- Government of Ontario – natural gas plays a valuable role for affordable housing; 1.5M housing target to address housing shortage
- OBC 2024 maintains energy efficiency requirements from OBC 2017

Internal Data:

- 2023 Residential End-Use Survey results

Uncertainties:

- NBC 2025 set to include operational GHG standards. Ontario did not harmonize with NBC 2020 for energy efficiency. It is unclear how harmonization will occur with NBC 2025.
- Development and timelines of municipal green development standards are unclear.

Existing Buildings

External Signals:

- No current policies to prevent conversion to natural gas or to require electrification in existing buildings
- EETP Report – coordinated planning is required for a successful energy transition, limited progress with LDCs to date.

Internal Data:

- EGI Capture Rate of customers remains high at approximately 95% at 0-300 m
- 2023 Residential End-Use Survey results
- 2019 to 2023 EGI data show rate of meter disconnections

Energy Transition Signals Summary – Toronto

ENBRIDGE
Life Takes Energy

New Buildings

External Signals:

- TGS V4 currently in place, allows natural gas in new builds
- Update and release of TGS V5 in 2025 – anticipates that it will "discourage natural gas"
- Update and release of TGS V6 in 2028 – anticipates that natural gas would not comply with standards

Uncertainties:

- Current City of Toronto progress and actions align with the Business as Planned emissions scenario rather than NZ40.
- Toronto Hydro Rate Application
  - No distinct building heat electrification forecast for 2025-29
  - Takes a "wait and see approach" for investments in new capacity that could accommodate wide-scale building electrification from the mid-2030s and beyond.

Existing Buildings

External Signals

- Emission Performance Reporting Bylaw in place as of 2024
- Loan programs in place – Home Energy Loan Program for low-rise residential, Energy Retrofit Loan for larger buildings
- Rebate/Incentive programs

Uncertainties

- Emission Performance Standards in development, but policy structure and timing is unknown currently

ET Adjustment Enhancements

- Specific ET Adjustments were developed for the City of Toronto:
  - Toronto currently has more progressive climate plans than the rest of Ontario
  - Toronto represents ~14% of Enbridge's customer base and ~ 5% new connections
- Additional ET Adjustments for voluntarily fuel switching away from natural gas:
  - Consideration for full home renovations
  - Voluntary appliance change-out (i.e., early retirement) triggered only after primary end-of-life appliance change-out
- More aggressive timelines for potential loss of new construction and conversion additions as well as existing customers.

ET Adjustments for General Service New Construction

Rebasing Assumption: less than 1% of builders voluntarily do not connect to natural gas network starting in 2023, increasing to 12.5% by 2032. This represented a 1.9% reduction in 2025.

2024 Customer Forecast Adjustments:

Ontario	Toronto
2025: 3.5% reduction	**2025**: 1.9% reduction, increases linearly to 15% in 2028 (TGS V5 in effect)
2026: 5% reduction, increases linearly to 2034 (set point of 12.5% at 2030)	**2029**: 35% reduction (TGS V5 builds) **2030**: 50% reduction (TGS V6 in effect), increases linearly to 2034
2034: 20% reduction (linear projection)	**2034**: 90% reduction in 2034 (TGS V6 builds)

ET Adjustments for General Service Conversions

Rebasing Assumption: Starting in 2030, 10% fewer existing homes (not previously heated with natural gas) convert to natural gas. There is already a declining trend observed in historical conversion data and inherently incorporated in conversion forecasting.

2024 Customer Forecast Adjustments:

Ontario and Toronto
2025: 5% reduction, increases linearly to 2034 **2034**: 100% reduction

ET Adjustments for General Service Existing Customers

Rebasing Assumption: Equipment lifespan is estimated at 20 years (5% annual turnover rate). 10% of customers have only one gas appliance. Starting in 2026, it is assumed that 10% of general service customers voluntarily replace EOL equipment with non-gas options, those with one appliance are assumed to disconnect from the natural gas network (5% * 10% * 10% = 0.05%).

Rebasing ET Adjustments Impacts: Estimated cumulative impact on Existing Customers was approximately 33,000 disconnections by 2032.

ET Adjustments for General Service Existing Customers

2024 Input Considerations for ET Adjustments:

- 2019 to 2023 average meter/customer egress of ~0.08% per year

Fuel-switching considerations:

- Equipment lifespan is ~18 years (5.5% annual turnover rate)
- Of the customers with an EOL appliance, 26% would voluntarily replace space heating equipment with non-gas options*
- New home preference for natural gas heating is 71% (29% non-gas)*
- Assumed probabilities of system disconnection for additional fuel-switching triggered by EOL equipment (table below)*
- ~1% of Building Permits in City of Toronto in 2023 involved changes to space heating equipment. Conservatively, the same rate was applied for Ontario-wide renovations.

Number of Appliances	% of Customers	Probability of System Disconnection
1	13%	100%
2	35%	25%
3+	51%	5%

. * Based on the 2023 Residential End Use Study – Natural Gas Equipment

ET Adjustments for General Service Existing Customers

2024 Customer Forecast Adjustments:

Ontario and Toronto

2025 & 2026: 0.08% reduction, based on the average customer/meter egress from 2019-2023

Ontario	Toronto
2026: Linear increase from 0.08% to 0.637% in 2034	**2026:** Linear increase from 0.08% to 0.637% in 2029

- EOL fuel-switching:
  - 5.5% annual equipment turnover rate
  - 13% of customers have only 1 appliance, 26% would replace space heating with non-gas and disconnect from system. (5.5% * 13% * 26% = 0.186%)
  - 35% of customers have only 2 appliances, 26% would replace space heating with non-gas, 25% would replace both appliances and disconnect from the system (5.5% * 35% * 26% * 25% = 0.125%)
  - 51% of customers have 3+ appliances, 26% would replace space heating with non-gas, 5% would replace all appliances and disconnect from the system (5.5% * 51% * 26% * 5% = 0.036%)
- Renovation: 1% of customers voluntarily do full home renovations with 29% fuel switching to non-gas (1% * 29% = 0.29%)

Toronto

2030: Linear increase from 0.637% to 0.825% in 2034, EOL fuel switching assumed to increase from 26% to 40% in 2030

ET Adjustments for Average Use – 2025 - 2034

All Regions (Central, East, West, North, South) – ET Adjustment to remain as Rebasing ET Adjustment for Average Use for Existing Customers and Customer Additions*

EGI will apply the Federal Carbon Charge (FCC) annually to its average use methodology. The annual FCC increases by $15 per tonne CO2e/year. In 2025, the FCC is set to $95 per tonne CO2e/year and will reach $170 per tonne CO2e in 2030. In 2031 and beyond, it will be set to $170 per tonne CO2e/year + 2% increase/year to account for inflation.

Toronto/Area 10 – ET Adjustment for Average Use for New Customer Additions *only

ET Adjustment will be applied to the Average Use Forecast for Toronto/Area 10 Customer Additions based on TGS V4 as follows:

- **Residential:** TGS V4 Low-Rise Development Requirements apply and require achievement of ENERGY STAR for Tier 1 compliance (20% efficiency improvement over OBC). Simplifying assumption that ENERGY STAR requirement remains in TGS V5 and V6. Apply 20% reduction year-over-year from 2025 to 2034, or until a sufficient trend has been observed in the forecast input data.
- **Apartment Traditional & Commercial:** Energy efficiency improvements based on Thermal Energy Demand Intensity (TEDI) targets in TGS tiers as compared to OBC 2024 (2017) as a baseline.

2025: 35% reduction, year-over-year	Average use reduction due to TGS V4 builds (TGS V4 in effect May 2022). TGS V5 in effect. TGS V6 in effect in 2028.
2029: 61% reduction, year-over-year	Average use reduction due to TGS V5 builds.
2034: 87% reduction, year-over-year	Average use reduction due to TGS V6 builds.

ET Adjustment for Design Hour

- ET Adjustment for design hour remained consistent with the approach summarized in Enbridge's 2024 Rebasing and IRM filing (EB-2022-0200) Exhibit 1, Tab 10, Schedule 4.
- Design Hour incorporates the ETSA peak hour trends observed in the ETSA Reference Case scenario, which included impacts from future DSM programming, carbon pricing and natural gas commodity pricing, building performance and appliance efficiency improvements for existing customers. EGI adjusted the baseline to 2022 (to align with most current actuals) for the 2025-2034 forecast period.

List of Acronyms

DSM	Demand Side Management
EETP	Electrification and Energy Transition Panel
EGI	Enbridge Gas Inc.
EOL	End of Life
ET	Energy Transition
ETSA	Energy Transition Scenario Analysis
IRM	Incentive Rate Mechanism
LDC	Local Distribution Company
NBC	National Building Code
OBC	Ontario Building Code
TGS	Toronto Green Standard

Table 1
Impact of Egress ET Adjustment on Enbridge Gas Average Number of Customers

Line No.	Calendar year	EGD Rate Zone		Union South Rate Zone		Union North Rate Zone		Enbridge Gas	
		Residential	Commercial	Residential	Commercial	Residential	Commercial	Total reduction	Total reduction (%)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1	2025	(1,742)	(133)	(900)	(71)	(275)	(25)	(3,146)	-0.08%
2	2026	(3,500)	(266)	(1,808)	(142)	(552)	(50)	(6,318)	-0.16%
3	2027	(7,429)	(575)	(3,524)	(275)	(1,074)	(97)	(12,974)	-0.32%
4	2028	(13,554)	(1,058)	(6,058)	(470)	(1,845)	(166)	(23,151)	-0.57%
5	2029	(21,893)	(1,715)	(9,419)	(728)	(2,866)	(256)	(36,877)	-0.90%
6	2030	(31,677)	(2,473)	(13,611)	(1,047)	(4,137)	(369)	(53,314)	-1.29%

Table 2
Impact of Egress ET Adjustment on Enbridge Gas Annual Demand

Line No.	Calendar year	EGD Rate Zone Residential (m3)	EGD Rate Zone Commercial (m3)	Union South Rate Zone Residential (m3)	Union South Rate Zone Commercial (m3)	Union North Rate Zone Residential (m3)	Union North Rate Zone Commercial (m3)	Enbridge Gas Total reduction (m3)	Enbridge Gas Total reduction (%)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1	2025	(4,028,931)	(3,468,650)	(1,935,220)	(1,264,293)	(592,205)	(451,935)	(11,741,234)	-0.08%
2	2026	(8,054,845)	(6,896,115)	(3,869,514)	(2,531,298)	(1,184,663)	(897,670)	(23,434,107)	-0.15%
3	2027	(17,087,061)	(15,221,890)	(7,514,947)	(4,985,553)	(2,300,891)	(1,647,373)	(48,757,714)	-0.31%
4	2028	(31,147,697)	(28,381,562)	(12,878,161)	(8,634,838)	(3,942,918)	(2,802,560)	(87,787,735)	-0.56%
5	2029	(50,266,808)	(46,341,492)	(19,968,336)	(13,471,438)	(6,114,264)	(4,243,188)	(140,405,525)	-0.90%
6	2030	(72,610,760)	(66,552,728)	(28,795,501)	(19,480,527)	(8,816,779)	(6,074,083)	(202,330,377)	-1.29%

Table 3

Impact of Average Use ET Adjustment (Toronto Green Standard) on Enbridge Gas's Annual Demand

Line No.	Calendar year	EGD Rate Zone Residential (m3)	EGD Rate Zone Commercial (m3)	EGD Rate Zone Total reduction (m3)	Enbridge Gas Total reduction (%)
		(a)	(b)	(c)	(d)
1	2025	(182,350)	(950,169)	(1,132,519)	-0.01%
2	2026	(690,747)	(3,806,207)	(4,496,954)	-0.03%
3	2027	(1,170,153)	(6,443,829)	(7,613,982)	-0.05%
4	2028	(1,614,277)	(8,888,526)	(10,502,804)	-0.07%
5	2029	(1,992,483)	(19,117,984)	(21,110,467)	-0.14%
6	2030	(2,272,439)	(21,715,836)	(23,988,275)	-0.16%

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

2

Question(s):

a) Is the Enbridge demand forecast just for a five year period or a longer period? If it is for a longer period, please explain how it is adjusted for use in the gas supply plan.

b) Has Enbridge undertaken any analysis to compare its demand forecast against municipal energy and emission plan forecasts? If yes, please provide those materials. If not, why not.

Response:

a) Enbridge Gas's demand forecast, and gas supply plan modelling is prepared on the basis of a 10-year horizon. Enbridge Gas's 5-Year Gas Supply Plan is based on the first five years of the forecast period. Operationally the first year of the gas supply plan forecast period is used for the upcoming gas year. The demand forecast is updated annually, and a revised gas supply plan is prepared.

b) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding.

The demand forecast used for the purposes of the 5-Year Gas Supply Plan was settled in Phase 1 of the 2024 Rebasing Application[1]. As set out in the Gas Supply Plan Framework (Framework)[2], a distributor is expected to use its OEB-approved methodology when preparing a gas supply plan. The demand forecast methodology is not subject to review and adjustment in this proceeding.

[1] EB-2022-0200.
[2] EB-2017-0129, Report of the Ontario Energy Board, October 2018, p.8.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

2

Reference:

Table 23 Actual vs. Plan Annual HDDs [Page 81]

Question(s):

It appears that the variance between Actual and Plan Annual HDDS is increasing significantly as time goes on. Has Enbridge assessed that trend? If no, why not. If yes, please provide those details and how Enbridge is adjusting to reduce this variance for the future.

Response:

Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding.

The demand forecast used for the purposes of the 5-Year Gas Supply Plan was settled in Phase 1 of the 2024 Rebasing proceeding[1]. As set out in the Gas Supply Plan Framework (Framework)[2], a distributor is expected to use its OEB-approved methodology when preparing a gas supply plan. The demand forecast is not subject to review and adjustment in this proceeding.

[1] EB-2022-0200.
[2] EB-2017-0129, Report of the Ontario Energy Board, October 2018, p.8.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

2

Reference:

Scorecard [Appendix E, Page 2]

Question(s):

a) For each scorecard metric, please explain how it measures the benefits expected from results of the gas supply planning decisions Enbridge has made.

b) Has the OEB provided approval for any of the metrics and targets being used by Enbridge in the gas supply scorecard? If yes, please provide the decision references.

c) Many (13 out of 29) of the targets in the scorecard are “N/A” or “C”. Please explain how “N/A” and “C” are used to assess tangible results in alignment with the OEB’s Framework.

d) When was “Percentage of certified gas in the portfolio” added to the scorecard and what how is this used to quantify customer benefits? If customer benefits have been quantified, please provide the analysis.

e) RNG has N/A as the target and is noted as 0% results for each year in the scorecard. Please explain the purpose of this metric?

f) Please explain what Enbridge is doing to encourage and support RNG production in Ontario that is not reflected in the 0% results reported.

Response:

a) The performance metrics[1] provide specific measures of the Gas Supply Plan's performance in achieving the Framework's guiding principles. The performance metrics are categorized by the Framework's guiding principles and descriptions provided under the Performance Category, Intent of Measure, and Measure columns reflect the inherent benefits of each metric.

b) No, the performance metrics and targets have not been approved by the OEB.

c) A metric target of "C", which stands for compliant, is provided for metrics where the expected result of the metric is compliance with the intent of the measure.

A metric target of "N/A" is provided for two metrics that reflect the market price for natural gas over which Enbridge Gas has no control and for four metrics where insufficient historical data is available. Metric targets of "N/A" were described in the 5-Year Gas Supply Plan (GSP) evidence[2],

> Two performance metrics, "Reference Price" and "Instances when QRAM expected bill impacts exceed +/- 25%", were not attributed a target or variance range. Given the nature of these metrics a target or variance range was considered not appropriate and therefore these have been marked as "N/A". In addition, the metric "Percentage of RNG in the portfolio", "Emission abated through procurement RNG", "Emission abated through procurement of hydrogen", and "Percentage of certified gas in the portfolio" do not have sufficient historical data to calculate a variance range. These performance metrics are marked as "N/A" until sufficient historical data points are available to support the calculation.

d) "Percentage of certified gas in the portfolio" was added to the performance metrics as part of the 2023 Annual Update in response to stakeholder interest. This metric does not quantity customer benefit because customers cannot directly achieve emissions reduction by using certified gas.

e) Please see response at part c) regarding the metric target of "N/A" for the metric "Percentage of RNG in the portfolio". The 0% reported is a result of rounding. The result of this metric without rounding is provided in Table 1.

[1] EB-2025-0065, Appendix E.
[2] EB-2025-0065, p.85.

Table 1
Percentage of RNG in the Portfolio

	2023/24 Results	2022/23 Results	2021/22 Results	3-Year Average
Percentage of RNG in the Portfolio	0.0005%	0.00047%	0.019%	0.0067%

The purpose of this metric, as described in Appendix E "Intent of Measure" column, is to report on how public policy is considered in the gas supply plan.

f) The performance metric results for RNG are reflective of the Company's past efforts to support RNG production in Ontario as described in the 5-Year GSP evidence.[3] These activities included marketing campaigns to support customer interest in the Voluntary RNG program, engagement with RNG producers and customers in support of the proposed Lower-Carbon Voluntary Program (LCVP)[4], and participation in related conferences, stakeholder events, and associations.

[3] EB-2025-0065, pp.70-71.
[4] The Lower-Carbon Voluntary Program was proposed as part of 2024 Rebasing.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

2

Reference:

[p.30]

Question(s):

Please explain Enbridge's understanding of any natural gas transportation system expansions that would add transportation capacity to Dawn (directly or indirectly) over the next 5-years

Response:

Enbridge Gas is not currently aware of any natural gas transportation system expansion projects that would add transportation capacity to Dawn (either directly or indirectly) over the next 5 years.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

2

Reference:

[p.38]

Question(s):

Enbridge states: “For the winter 2024/25, Enbridge Gas replaced its 2% tolerance for peaking services with an amount equivalent to the statistical variation within the design day model because of the increase in design day demand from implementing the new design day methodology. Enbridge Gas used statistical validation analysis of the design day model to determine the deviation between actual and forecasted design day demand. The statistical analysis resulted in a 2.7% variation, which Enbridge Gas used as the basis for increasing reliance on peaking services to approximately 2.7% of total demand in the Enbridge CDA.” Please provide further detail regarding the statistical validation analysis undertaken, and if the results included a confidential interval.

Response:

For Winter 2024/25, Enbridge Gas calculated the base year design day demand using a regression analysis. The analysis includes the actual daily measured volumetric demand from the prior winter and weather data in the form of wind speed compensated heating degree day (HDDw)[1] with weekends and holidays removed. The regression analysis is extrapolated to the design day HDDw. The resulting demand at the design day HDDw is the base year design day demand. This process is termed the “Load Cold Analysis” or (“Load Cold”)[2].

[1] As described in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, Section 3.
[2] This process is described in EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51, steps a) through f).

For the Enbridge CDA, the Load Cold was validated using a forecast accuracy metric – Mean Absolute Percentage Error (MAPE). The validation analysis was performed using the following steps:

i. Split the Winter 2024/25 Load Cold dataset (composed of daily actual volume and weather) randomly into a training set which has 70% of the total dataset and a validation set which has the remaining 30% of the total dataset.
ii. Calculate the base year design day demand using a Load Cold Analysis using only the training dataset. This analysis produces a “training set” relationship.
iii. Using the HDDw from the validation set, feed the HDDw into the “training set” relationship and determine the calculated validation demand.
iv. Compare the validation set actual demand to the validation set calculated demand (step iii). The differences are errors (residuals).
v. Use the residuals to measure the Load Cold Analysis forecast accuracy by calculating MAPE.
vi. Repeat this for a number of iterations. The data is randomly reassigned between validation and testing datasets between iterations.
vii. Calculate the average forecast accuracy metric. That is the average MAPE of the iterations.

The Enbridge CDA forecasting performance, measured by a MAPE of 5.5%, indicates highly accurate forecast according to commonly accepted thresholds[3] demonstrating the validity of the Load Cold Analysis.

Following this validation analysis, Enbridge Gas utilized a forecasting error metric, Root Mean Squared Error (RMSE), to inform its peaking service tolerance for the Enbridge CDA.

RMSE is calculated by:

i. Calculate the square of the residuals between the Load Cold Analysis result (as shown in the first paragraph) and the actual daily demand of the full dataset.
ii. Sum the squared residuals for the full dataset.
iii. Calculate the mean of the results from step ii) which is the mean squared error (MSE).
iv. Calculate the square root of the MSE from step iii) to calculate the RMSE.

[3] Lewis, C. D. (1982). Industrial and business forecasting methods: A practical guide to exponential smoothing and curve fitting (2nd ed., p. 40). London: Butterworths.

v. The RMSE value is subtracted from the base design day demand as calculated in the first paragraph to form a lower error band. This is the RMSE adjusted base design day demand.

vi. The RMSE adjusted base design day demand is substituted into the design day demand forecast process to determine the RMSE adjusted forecast design day demand.

vii. This results in a RMSE adjusted forecast design day demand that is 2.7% lower than the original forecast design day demand.

viii. Gas Supply Planning contracted firm transportation for the adjusted forecast design day demand and contacted for peaking services for the remaining 2.7%.

The results did not include a confidence interval.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

2

Reference:

[p.80]

Question(s):

Please provide a table that shows which specific elements of transportation and gas supply costs, impacted by the Gas Supply Plan, are considered as part of each of the application types listed in Table

Response:

Table 1 includes a summary of specific elements of gas supply plan costs impacted by other applications[1]. Further detail on gas supply cost impacts can be found in the other applications filed with the OEB[2].

[1] Other applications relate to applications included in the 5-Year Gas Supply Plan, Table 22.
[2] Rebasing Phase 1 (EB-2022-0200), Phase 2 (EB-2024-0111), Phase 3 (EB-2025-0064); July 1, 2025, QRAM (EB-2025-0165); 2023 Utility Earnings and Disposition of Deferral & Variance Account Balances (EB-2024-0125).

Table 1
Gas Supply Plan Costs Impacted by Other Applications

Line No.	Particulars	Specific Elements of Gas Supply Costs
	(a)	(b)
1	Rebasing/Cost of Service Application	January 1, 2025, to December 31, 2028, gas costs and deferral account harmonization, specifically: Phase 1 – gas supply costs excluding load-balancing Phase 2 – load-balancing costs, market-based storage proposal and operational contingency space Phase 3 – rate design for gas supply commodity charge and gas supply transportation charges; deferral and variance account harmonization – Purchase Gas Variance Account, Third-Party Transportation Variance Account, Load Balancing Price Variance Account, Inventory Revaluation Variance Account, Market-Based Storage Variance Account
2	QRAM	Gas supply costs are updated in base rates for forecast commodity market prices and transportation tolls Disposition of actual gas costs for gas supply deferral accounts: EGD rate zone – PGVA Union rate zones – South PGVA, North PGVA, North Tolls and Fuel, Inventory Revaluation, and Spot Gas
3	Disposition of Deferral and Variance Account Balances	Disposition of actual gas costs for gas supply deferral accounts: EGD rate zone – Storage and Transportation Deferral Account, Transactional Services Deferral Account Union rate zone – UDC, Upstream Transportation Optimization, Short-Term Storage and Other Balance Services, North T-Service TransCanada Capacity Deferral Account
4	Leave to Construct Application	Review of forecast gas supply costs against alternatives. Actual gas supply costs included in QRAM and/or Annual Rate applications, as appropriate.
5	Long-Term Contract Application	Review of forecast gas supply costs against alternatives. Actual gas supply costs included in QRAM and/or Annual Rate applications, as appropriate.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Three Fires Group Inc. (Three Fires) / Minogi Corp. (Minogi)

Interrogatory

Issue:

2

Reference:

- Enbridge Gas Inc.'s ("EGI") 5-Year Gas Supply Plan (the "GSP"), section 6
- Enbridge Inc.'s Indigenous Peoples Policy ("IPP")
- Enbridge Inc.'s Indigenous Reconciliation Action Plan ("IRAP")
- 1-GFN-1

Preamble:

In section 6 of the GSP, EGI provides how the GSP was developed in support of and in alignment with public policy.

Question(s):

a) Please define the criteria EGI used to determine what constitutes relevant "public policy" for purposes of the GSP.

b) Please confirm whether "public policy", as used in the GSP, includes Indigenous reconciliation and/or Indigenous economic development. If yes, please identify where in the GSP EGI considered Indigenous reconciliation and/or Indigenous economic development. If not, explain why not and provide EGI's rationale.

c) Please provide any internal guidance EGI used to determine whether First Nations perspectives should inform development of the GSP.

d) Please identify and/or discuss any feedback received from First Nations as part of developing the GSP and indicate how it influenced the GSP. If no feedback was provided, please explain why not.

e) Please also include as part of your response to 1-GFN-1 h) and i) the same information particular to (i) Chippewas of Kettle and Stony Point First Nation and (ii) Mississaugas of Scugog Island First Nation.

Response:

a–c) Please see response at Exhibit I.1-GFN-3, parts a), c) and d).

d) Please see response at Exhibit I.1-GFN-1, part c).

e) Please see response at Exhibit I.1-GFN-1, parts h) and i).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Three Fires Group Inc. (Three Fires) / Minogi Corp. (Minogi)

Interrogatory

Issue:

2

Reference:

- GSP, pp. 69

Preamble:

EGI notes RNG is a lower-carbon fuel that will play a role in Ontario's energy transition.

Question(s):

a) Please discuss EGI's RNG procurement plans over the GSP period.

b) Please confirm whether EGI will consider and/or prioritize RNG supplied by Ontario producers. In your response, please discuss the availability of RNG produced in Ontario for EGI's customers.

c) Please discuss any RNG-related expressions of interest, proposals, or partnership approaches received by EGI from First Nations or Indigenous-owned entities over the previous 5-year gas supply period and/or that EGI considered in preparing the GSP.

d) Please explain why potential Indigenous-led RNG projects, including any discussions or proposals from Ontario First Nations, were not included in the GSP section on RNG.

e) Provide any internal assessments or analyses considering Indigenous participation in RNG development over the GSP 5-year planning horizon.

Response:

a) At this time Enbridge Gas intends to continue its Voluntary RNG (VRNG) program without change, including supporting additional customer enrollment and the procurement of resulting RNG volumes as discussed in the 5-Year Gas Supply Plan.[1] Enbridge Gas has no plans for additional RNG procurement beyond that required to support the VRNG program over the forecast period (2024/25 to 2029/30) of the 5-Year Gas Supply Plan.

b) Enbridge Gas expects to prioritize the procurement of RNG supplied at Dawn for the VRNG program and does not expect to have any challenges procuring the volumes of RNG required for the program as they are relatively modest (5,680 GJ since 2021) in comparison to total annual gas supply. Please see response at Exhibit I.6-PP-17 for annual details of RNG volumes procured compared to total annual gas supply.

c-e)
Enbridge Gas declines to answer these questions as they are not relevant to the Issues List in this proceeding. These questions relate to RNG development projects which are not related to the gas supply plan procurement of RNG.

[1] EB-2025-0065, p.70.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Three Fires Group Inc. (Three Fires) / Minogi Corp. (Minogi)

Interrogatory

Issue:

2

Reference:

•GSP, pp. 71

Preamble:

EGI indicates that it supports the goals of certified natural gas ("CNG") and suppliers implementing practices to lower emissions and achieve environmental, social and governance ("ESG") goals.
EGI notes that it procures CNG as part of the gas supply commodity portfolio but does not have a strategy to actively increase procurement of CNG. The proportion of certified natural gas of the total 2023/24 gas supply portfolio was 4.5%.

Question(s):

a) Please provide the certification frameworks and schemes under which EGI has procured CNG.

b) Has EGI assessed whether CNG certification frameworks are consistent with policy documents such as the IPP and IRAP? As part of your response, please indicate and provide details regarding (i) whether any of the certification frameworks identified in a) above include recognition of the rights of Indigenous Peoples, Indigenous reconciliation, and/or adhere to the principle of free, prior and informed consent ("FPIC") as certification or eligibility requirements and (ii) the total proportion of CNG procured under such framework(s).

c) What is the availability of CNG produced in Ontario for EGI's customers in Ontario?

d) Please explain EGI's rationale for not developing an CNG procurement strategy and how that aligns with the GSP's public policy objectives.

e) If EGI were to develop a CNG procurement strategy, please discuss whether EGI can and/or would consider setting targets for procuring CNG from Indigenous-owned suppliers.

f) Please explain and provide examples related to CNG what is meant by “achieve [ESG] goals”.

g) Please provide any ESG or social co-benefit criteria that have been used when selecting CNG suppliers and whether Indigenous participation or other Indigenous-related metrics and considerations form part of EGI’s supplier evaluation.

Response:

a) Please see response at Exhibit I.2 ED-10, part c).

b) No, Enbridge Gas has not assessed whether the certified natural gas programs discussed in part a), are consistent with the IPP and IRAP.

   (i) The Equitable Origin certification program includes an Indigenous Peoples Rights Principle in its program framework and has identified FPIC as a component.

   (ii) Approximately 60% of the certified natural gas volumes procured by Enbridge Gas to date were certified under the Equitable Origin program.

c) While it is possible to procure certified natural gas volumes in Ontario (e.g., at the Dawn Hub) from gas suppliers, such volumes were produced outside of the province and shipped to Dawn. Enbridge Gas is not aware of any certified natural gas volumes being produced within Ontario at this time.

d) Pease see response at Exhibit I.2-STAFF-14.

e) Enbridge Gas has no current plans to develop a certified natural gas procurement strategy; accordingly, it is premature for Enbridge Gas to commit to establishing additional performance targets to procure certified natural gas from Indigenous-owned suppliers.

f) Certified natural gas frameworks as they related to ESG considerations vary according to each program, with environmental management being the most commonly addressed aspect between programs. Examples of environmental management considerations in certified natural gas programs include monitoring and reducing air emissions, such as methane or other sources of emissions, and water and land management. Examples of social and governance related considerations

that some certified natural gas programs include are safety, labour and working conditions, corporate governance, and community engagement.

g) Enbridge Gas currently procures certified natural gas volumes solely in instances where those volumes are the most economic gas supply option available. No ESG, social-co-benefit criteria, or Indigenous-related metrics are considered when selecting certified natural gas suppliers.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 2, page 8

"Service harmonization proposals could impact certain demand and/or supply forecasts used as inputs into the Plan. The impact of service harmonization, however, is not expected to have a material impact on asset utilization in the Plan or result in incremental Plan contracting."

Question(s):

How does service harmonization impact demand or supply forecasts?

Response:

Enbridge Gas has proposed a Rate Harmonization Plan as part of Phase 3 of the 2024 Rebasing Application[1] which includes the harmonization of services, rate zones, rate classes and rate design. The following service harmonization proposals may have an impact, which is not expected to be material, on the demand and/or supply forecasts that underpin the Gas Supply Plan:

- Elimination of Rate 25 interruptible sales service for bundled direct purchase (DP) customers[2] – Enbridge Gas proposes Union North bundled DP customers be aligned with bundled DP customers in other rate zones and be required to provide the gas supply to meet their planned interruptible consumption through their daily contracted quantity (DCQ).
- Harmonization of receipt points[3] – as part of the harmonization of receipt points, Enbridge Gas proposes to eliminate Empress as a point of receipt for bundled

[1] EB-2025-0064.
[2] EB-2025-0064, Phase 3 Exhibit 8, Tab 4, Schedule 3, section 3.1, pp.14-15.
[3] EB-2025-0064, Phase 3 Exhibit 8, Tab 4, Schedule 3, section 4.2, pp.20-23.

DP customers and customers will be required to transition their supply to Dawn. This results in a shift of system supply purchases from Dawn to Empress.

- Balancing obligations and checkpoints[4] – Enbridge Gas proposes to introduce checkpoint balancing to DP customers not currently subject to checkpoints. Checkpoint balancing requires DP customers to balance at certain dates throughout the year. Absent checkpoints, actual balancing activities for these customers would be managed as part of the gas supply activities.
- Storage allocation methodology[5] – Enbridge Gas proposes to set the maximum limit on semi-unbundled customers cost-based withdrawal rights at 5%. This proposal results in Enbridge Gas not incurring additional costs to provide higher deliverability for a subset of customers, which would otherwise increase the average cost of storage for all customers.
- Storage space allocation methodology[6] – Enbridge Gas proposes to apply the current Union South rate zone method of determining storage space/deliverability for unbundled customers to unbundled customers in other rate zones. As a result, the storage requirement of the gas supply plan may be impacted, however impacts are not expected to be material.

Enbridge Gas expects to implement the outcomes of the OEB decision for Phase 3 of the 2024 Rebasing Application in 2027, pending the outcomes of the decision and OEB approval.

[4] EB-2025-0064, Phase 3 Exhibit 8, Tab 4, Schedule 3, section 5.3, pp.33-36.
[5] EB-2025-0064, Phase 3 Exhibit 8, Tab 4, Schedule 4, section 5, pp.12-16.
[6] EB-2025-0064, Phase 3 Exhibit 8, Tab 4, Schedule 5, section 4.2, pp.16-20.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 4, page 17

"The final number of general service customers forecast is derived by adjusting the base forecast with an energy transition (ET) adjustment, which considers potential loss of customers over time (egress of the natural gas system).."

Question(s):

Please explain how the ET adjustment is made and whether the adjustment methodology changes in gas plan years (e.g. is modified based on changing government policy or other factors).

Response:

Please see response at Exhibit I.2-PP-2.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 4, Table 1, page 20

Question(s):

The annual demand forecast for the General Service class of customers in the Union South zone is nearly unchanged in the years 2024 through 2029 whereas the EGD Zone for this class of customers there is a marked decline of around 2.5% (i.e., 393.5 vs 384.2). Are the same forecast models used for each zone? If not, what are the differences in the models. If the same forecasting models and techniques are applied to each zone, what explains the diverging trend between these two different service zones?

Response:

Enbridge Gas has updated its 2025 demand forecasts using the methodologies underpinning the 2024 OEB-approved volume forecast. The residential and non-residential average use per customer forecast is developed for each weather zone namely, Central, East, West, South, and North[1]. Enbridge Gas uses distinct models developed and used for each weather zone for this purpose. Each model incorporates both historical trends and the influence of other factors that are included in the models through driver variables, to produce a more robust and accurate forecast. When the historical trends or the factors influencing the respective average uses differ, the average use forecast for the different weather zones may diverge.

Over the last five years, the average use in the EGD rate zone declined by 1.4%, while the average use in the Union South rate zone declined by 0.4%. During the forecasting period of 2024-2029, the EGD rate zone general service customers' demand is forecast to decline by approximately 0.6% each year, while the Union South rate zone

[1] EB-2022-0200, Exhibit 3, Tab 2, Schedule 5, Sections 3.2 and 4.2.

customers' demand is forecast to decline by approximately 0.1% each year. Therefore, the sharper declining historical trend observed in the EGD rate zone average use compared to the Union South rate zone would lead to a greater decline in the demand forecast. Additionally, the EGD rate zone non-residential models include real gas price[2], which may contribute to a further decline in the forecast when gas prices are expected to rise during the forecast period. Lastly, an Energy Transition Adjustment for average use (Toronto Green Standard) is applied to the City of Toronto which caused an additional 0.05% reduction in the EGD rate zone average use.

[2] The real gas price variable was excluded from the non-residential average use models for Union South and North weather zones since it was not statistically significant.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 4, page 28

"Enbridge Gas's preferred planning strategy is to meet design day shortfalls using third-party (peaking) services up to a maximum limit of 2% of design day demand for each delivery area. Once peaking services have been contracted to the preferred maximum by delivery area, Enbridge Gas will look to other alternatives to meet design day shortfall.."

Question(s):

What is the relationship (if any) between design day shortfalls and the curtailment of interruptible customers? Specifically, would increasing the potential curtailment volumes have an impact on the need to contract for or call upon peaking services?

Response:

Enbridge Gas's design day demand forecast included in the 5-Year Gas Supply Plan does not include the demand for customers with an interruptible service. The harmonization of demand methodologies was part of Phase 1 of the 2024 Rebasing Application which established the exclusion of interruptible demand from the design day demand forecast used to prepare the gas supply plan.[1]

The conversion of customers with existing firm service to an interruptible service would reduce the design day demand forecast and the need to contract for or call on peaking services.

[1] The harmonization of design day demand and exclusion of interruptible volumes is outlined at EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p. 31. The 2024 Annual Update was the last gas supply plan that included interruptible demand (and partial curtailment) in the EGD rate zone design day demand forecast.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 5, page 43

"However, Enbridge Gas is not able to rely upon any interruptible service(s) to provide supply to the Sarnia market on a design day and the Company does not currently have a contract for firm storage service with Bluewater Gas Storage. Therefore, the Bluewater River Crossing contract provides a back-up supply option for the Sarnia market but is not relied upon in the design of the SIL."

Question(s):

Would contracting for Bluewater Gas Storage provide supply for the Sarnia market on a design day? If yes why is not being done?

Response:

Yes. If Enbridge Gas were able to contract for firm storage services from Bluewater Gas Storage (BGS), it could transport natural gas volumes withdrawn from BGS storage to the Sarnia Industrial Line System to supply the Sarnia market on a design day. BGS currently has no storage capacity available for contracting.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 5, pages 54

Table 14
Enbridge EDA
Supply/Service Option
Evaluation

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	↑	↑	→	7.97	<1%	No
Short-haul: D-P	↑	→	→	4.05	<1%	No
Short-haul: Niagara	→	→	↑	3.75	<1%	No
Short-haul: Iroquois	→	→	↑	2.70	<1%	No
Third-Party	→	↓	↑	2.02	<1%	Unknown

Table 16
Union EDA
Supply/Service Option
Evaluation

Option	Reliability	Flexibility	Diversity	Costs ($ million/yr)	Average Cost/Customer Impact	Available Capacity
Long-haul	↑	↑	↑	1.16	<1%	No
Short-haul: D-P	↑	→	→	0.50	<1%	No
Short-haul: Niagara	→	→	↑	0.53	<1%	No
Short-haul: Iroquois	→	→	↑	0.39	<1%	No
Third-Party	→	↓	↑	0.28	<1%	Unknown

Question(s):

a) The Enbridge EDA and Union EDA appear to have virtually the same transportation supply opportunities (as Figures 8 and 9 appear to confirm). The Tables reproduced above show the evaluation to be very similar (the exception being long-haul diversity). Please explain how the transportation and supply opportunities differ in these two EDAs.

b) Why does the evaluation of “Diversity” differ as between the two CDAs (whereas all others are directional the same as is available capacity.

c) Are any (or all) sales commodity or transportation contracts for these two EDAs the same and allocated to the specific EDA based on demands?

Response:

a) The Enbridge EDA and Union EDA delivery areas are located in a similar geographic region, so the transportation and supply options available to serve these areas are identical. However, transportation tolls on TransCanada (the TCPL Mainline) for each delivery area differ due to their respective distance from upstream receipt points (tolls based on pipe length required to serve each distinct delivery area). For example, the TransCanada tolls from Empress or Iroquois to the Enbridge EDA are lower cost than the tolls from those same receipt points to the Union EDA. By contrast, the transportation tolls from Niagara and/or Parkway to the Union EDA are lower than the tolls from those same receipt points to the Enbridge EDA

b) Enbridge Gas has assumed the question intended to refer to the “EDAs”, not “CDAs”.

   In the tables referenced, the indicator arrows are designed to reflect the relative impact of a given option compared to the existing portfolio used to serve each delivery area. When evaluating diversity of supply sources, the impact of adding long-haul capacity varies significantly between the Enbridge EDA and Union EDA. In the Enbridge EDA, long-haul capacity already accounts for approximately 44% of the delivery area's demand, or 260 TJ/d. Because this source is already heavily relied upon, adding more long-haul capacity would not enhance diversity. Conversely, in the Union EDA, only about 4% of demand, or 5.1 TJ/d, is currently met through long-haul capacity. Introducing additional long-haul capacity in this area would diversify the supply portfolio by incorporating a source that is currently underutilized. As such, the indicator arrows appropriately reflect these dynamics: a sideways arrow for diversity in the Enbridge EDA and an upward arrow in the Union EDA when long-haul capacity is added.

c) The Enbridge EDA and Union EDA are served by distinct commodity and transportation capacities of which the costs are allocated to each rate zone. Please also see response at Exhibit I.2-FRPO-14 for further discussion regarding the Company's TCPL transportation contract capacity to the Enbridge EDA and Union EDA.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 6, page 43, EB-2024-0111 Decision and Order May 29, 2025

Question(s):

Does the Board's recent decision with respect to the LCVP have any material impact on the current gas supply plan?

Response:

No. Enbridge Gas proposed to procure RNG volumes associated with the Lower-Carbon Voluntary Program (LCVP) in place of what would have been gas supply purchases at Dawn beginning in 2026. The OEB's 2024 Rebasing Phase 2 Decision[1] has no material impact on the current 5-Year Gas Supply Plan. At this time the Company has no plan to implement the LCVP in the manner approved by the OEB.

[1] EB-2024-0111, Decision and Order, May 29, 2025.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

2

Reference:

Section 10, Table 23, page 81 / Appendix E, page 1 0f 3 (ADD TABLE)

Question(s):

a) Actual HDD results would appear to show a systemic bias in that warmer than forecast temperatures have been occurring since 2022 and the variance in under forecasting temperature has been increasing. Such results might be consistent with a (global) warming trend were historical values are less indicative of future ones. What changes (if any) is EGI undertaking to test whether its HDD modeling continues to be a good indicator of future trends?

b) How did EGI determine the Target Variance range for HDD variances? Why are the ranges different from the various rate zones?

Response:

a) As explained in response at Exhibit I.2-PP-4, Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding.

b) Please see response at Exhibit I.2-STAFF-16 for further explanation on how Enbridge Gas established the target/variance range for each performance metric. The variance range for each HDD variance by rate zone is different because the HDD variance results for the five years of historical data are different by rate zone which resulted in different statistically significant variation ranges.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence (ED)

Interrogatory

Issue:

3

Reference:

Section 4.2, p. 18

Preamble:

Enbridge identifies a number of risks associated with the general service annual demand forecast in section 4.2. The following question is meant to understand some of the impacts of gas demand projections on Enbridge's planning. We are not asking Enbridge to accept or opine on the assumption.

Question(s):

(a) How important is it to have an accurate forecast of annual and peak demand for gas supply planning? Please explain the degree to which an accurate forecast helps Enbridge minimize the cost of gas supplied to its customers, and why.

(b) If the actual gas demand forecasts were 10% less than forecast (weather corrected), would that potentially mean that customers would pay unnecessarily high prices for gas (e.g. by entering into long-term contracts that were not necessary)?

(c) Please identify the elements of Enbridge's proposed Gas Supply Plan that would be different if the gas demand forecasts were 10% lower.

(d) If gas demand decreased by 10%, what percentage impact would that have on the price of gas in Ontario? (The impact will be very small in percentage terms but can be calculated.) Please provide an answer on a best-efforts basis.

Response:

a) The annual and design day demand forecasts are an integral part of Enbridge Gas's gas supply planning process, driving the need for appropriate levels of storage, transportation and commodity necessary to effectively and efficiently meet the demands of sales service, bundled DP and semi-unbundled DP customers. As discussed in the 5-Year Gas Supply Plan,[1]

> The development of the comprehensive 5-Year GSP begins with the determination of annual and design day demand forecasts that reflect external factors such as industrialization, energy transition, and weather fluctuations. Following the completion of the demand forecasts, Enbridge Gas identifies any Plan shortfalls based on its current portfolio of transportation and storage assets by delivery area. Enbridge Gas next evaluates and adjusts its transportation, storage, and commodity portfolio to ensure sufficient natural gas is available in each delivery area to meet the annual and design day demand forecasts.

Generally, inaccurate demand forecasts can lead to over or under contracting of transportation and storage services and gas supply commodity.

If design day demand forecasts are overstated –

Enbridge Gas may over contract for services resulting in higher gas supply costs for ratepayers relative to the incremental value provided. However, most of the existing transportation capacity contracted by Enbridge Gas includes renewal rights that can be exercised at its discretion every one to five years (depending on the pipeline) which contributes to portfolio flexibility (to adjust quickly to changes in supply or demand) while maintaining portfolio diversity and reliability.[2] The Company seeks to hold comparable diversity of term in its storage service portfolio.

If design day demand forecasts are understated –

Enbridge Gas may under contract for services that could result in service outages during high-demand periods (e.g., extreme weather events) and/or be forced to procure additional services and supply at a premium relative to the cost of standard firm transportation and storage services.[3] Further, given the scarcity of upstream transportation capacity, the Company may have challenges contracting for additional firm transportation services in future years.[4]

[1] EB-2025-0065, p.4.
[2] EB-2025-0065, pp31-32.
[3] Exhibit.I.5-EP-2.
[4] EB-2025-0065, pp.30-31.

If annual demand forecasts are overstated/understated –

Enbridge Gas's monthly procurement plans layer in annual, seasonal, monthly, and short-term purchases throughout the year to provide flexibility to adjust for changes to annual demand forecast or market variability.[5] Throughout the year, Enbridge Gas regularly monitors and adjusts its commodity procurement plans to ensure the security of sufficient and cost-effective commodity on behalf of customers. Depending upon the timing and magnitude of variances to annual demand forecast(s) experienced, Enbridge Gas could adjust its annual commodity procurement strategy to mitigate supply shortfalls or surpluses at a reasonable (or no) additional cost.

b-c) As explained in detail throughout the Company's 5-Year Gas Supply Plan, Enbridge Gas maintains diverse transportation and storage service portfolios as well as diverse and flexible commodity purchase plans. Enbridge Gas reviews and analyzes demand patterns and performs in-season forecasts of annual demand to inform any potential changes to its short-term gas supply procurement strategy.[6] Accordingly, a 10% change (positive or negative) in annual demand would have no impact on transportation or storage services but would result in a commensurate 10% change in planned commodity purchases. Storage capacity would enable the short-term mitigation of a 10% change in annual demand, allowing Enbridge Gas to inject or withdraw any excess/shortfall of gas supply as needed. Transportation or storage capacity may be adjusted for future gas supply plans if the decreased demand forecast persisted into future years. Please also see response at part a) above for additional discussion regarding gas supply cost impacts of variances to forecast, generally.

d) Enbridge Gas expects that if gas demands were to decrease by 10% (weather adjusted) some degree of short-term impact (reduction) of the prices of natural gas in Ontario is possible. However, estimating the magnitude and duration of that impact with any certainty is not reasonably possible given the complexity of North America's integrated natural gas facilities and markets.

Enbridge Gas expects that a 10% reduction in Ontario demands (in isolation) over the heating season would have a limited and short-term impact on Ontario gas prices.

[5] EB-2025-0065, p.79.
[6] EB-2025-0065, pp.73-74.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

3

Reference:

[p.11]

Question(s):

With respect to the FERC review of the Vector Pipeline tolls:

a. Is Enbridge actively participating in the FERC proceeding? If not, please explain why not

b. SEC understands that at issue in the review is Vector's cost of service. If Vector's cost of service is reduced by FERC, would the tolls it charges Enbridge be reduced?

Response:

a) Yes. Enbridge Gas has been approved as an intervenor in the Vector Pipeline L.P. (Vector) FERC Section 4 and Section 5 proceedings[1]

b) Enbridge Gas currently holds one transportation contract on Vector for 80,000 Dth/d[2] that is subject to an immediate toll reduction in the event that the recourse rate is reduced below the current negotiated rate.

[1] FERC docket numbers RP24-971-000/RP25-936-000.
[2] The 80,000 Dth/d contract includes renewal rights and has a termination date of October 31, 2028.

The other transportation contracts held by Enbridge Gas on Vector totaling 215,000 Dth/d[3] are based on negotiated rates that would not be subject to toll reductions during the current contract term if Vector's recourse rates were to decrease below the current negotiated rates.

[3] The 215,000 Dth/d associated contracts include renewal rights: 40,000 Dth/d with a termination date of October 31, 2026, 65,000 Dth/d with a termination date of October 31, 2027, and 110,000 Dth/d associated with NEXUS capacity with a termination date of October 31, 2033.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

3

Reference:

[p.33]

Question(s):

Please provide Figure 5 in Excel format.

Response:

Please see Attachment 1, provided in Excel format.

This page is intentionally left blank. Due to size, this Attachment has not been included.

Please see Exhibit I.3-SEC-8_Attachment 1.xlsx on the OEB's RDS.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue:

4

Reference:

1. [4.3 Average Day Requirement]
2. [4.4 Design Day Demand]

Question(s):

Hybrid space/water heating electrification activities (e.g. A portion of natural gas space/water heating load is replaced by electric heat pumps when feasible. Natural gas continues to provide 100% of space/water heating in certain conditions, such as below a specific outdoor temperature threshold) are taking place in both residential and commercial electrification projects. Please discuss how the forecast of average day demand requirement and design day demand are affected by these on-going hybrid space/water heating electrification activities in residential and commercial buildings.

Response:

It is Enbridge Gas's understanding that the number of heat pumps installed in Ontario is relatively small. Of those heat pumps installed, Enbridge Gas is unable to determine those that are a component of a heating system attached to the gas distribution system (i.e., hybrid heating) and those that are not. Further, it is generally not possible for Enbridge Gas to determine how the heat pumps are operated in the homes that have installed them without visibility to the control strategies and/or switch over temperatures used in the operation of the heat pumps. For example, the heat pumps could be operated for cooling only, could be set up for both heating and cooling (i.e. hybrid heating), or could be set up for fully electric heating only.

Due to this lack of visibility, Enbridge Gas has not explicitly accounted for reductions in natural gas demand from hybrid heating systems in demand forecasts.[1] However,

[1] Average day demand is annual demand forecast divided by 365.

changes in customer consumption patterns, such as those resulting from hybrid heating, are captured in Enbridge Gas's measured consumption data, which is then used in the development of forecasts. Actual daily measured volumetric demand measured at city gate stations and contract rate customer stations are used in the design day demand process and reflect customer consumption patterns from the previous winter as outlined in Phase 1 of the 2024 Rebasing Application[2]. Enbridge Gas's design day demand forecast also incorporates historical design day use per customer trends for existing general service customers, which would capture hybrid heating adoption trends among other consumption pattern changes. Thus, as hybrid heating adoption evolves, any resulting changes in the measured customer consumption patterns will be captured in Enbridge Gas's historical consumption data and gradually reflected in future demand forecasts.

[2] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

4

Reference:

GSP, p. 23
EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p. 18

Question(s):

a) Please explain why different timeframes for the highest observed HDD appear to be used in the design day determination in EB-2022-0200 (November 1, 1979-current) and the GSP (Winter 93/94 and Winter 2022/23).

b) Please explain why the design criteria for Sault Ste. Marie, Thunder Bay, Kingston, and Sudbury have changed between EB-2022-0200 and the GSP.

Response:

a-b) Enbridge Gas proposed a methodology to determine the design day HDDw for the facility planning of its integrated storage, transmission and distribution systems that used November 1,1979 as the start of the weather period.[1]

In the 2024 Rebasing Phase 1 Settlement Agreement parties settled on a modified version of Enbridge Gas's proposal to determine the design day HDDw for purposes of determining gas supply costs for 2024 and subsequent years. The modified version shortened the time period for the start of the weather period to Winter 1993/94.[2] The modified version reduced the design day HDDw for Sault Ste. Marie, Thunder Bay, Kingston, and Sudbury for purposes of the gas supply plan.

[1] Enbridge Gas's proposed methodology is described at EB-2022-0200, Exhibit 4, Tab 2, Schedule 3.
[2] EB-2022-0200, Settlement Agreement, Exhibit O, Tab 1, Schedule 1, August 17, 2023, p.36.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

4

Reference:

GSP, p. 45

Question(s):

Please provide a discussion of the implications on unutilized capacity of the implementation of the outcomes of the 2024 Rebasing Phase 2 Decision. To the extent possible, please provide a revised version of Table 7 showing the expected impact on unutilized capacity resulting from the implementation of the Phase 2 decision.

Response:

The outcomes of the 2024 Rebasing Phase 2 Settlement Agreement[1] will have no impact on the planned unutilized capacity of the gas supply plan.

The 2024 Rebasing Phase 2 Settlement Agreement results in the following impacts to the gas supply plan:

1) Total storage requirement of 217.7 PJ, including 18 PJ of market-based storage,
2) Maximum firm storage withdrawal and injection capabilities for in-franchise customers, and
3) 15.6 PJ of storage for operational contingency managed using inventory targets.

The 2024 Rebasing Phase 2 Settlement Agreement specifically addresses the use of storage assets within the gas supply plan which will not impact unutilized transportation capacity. Enbridge Gas's asset optimization model will continue to maximize the cost-effectiveness of the gas supply plan and prioritize gas from Empress to the Union North delivery areas and use diversions to alternate delivery areas where it can be used most

[1] EB-2024-0111, Settlement Agreement, November 29, 2024.

cost-effectively. The Phase 2 impacts to storage assets will not change this prioritization, or the amount of upstream transportation capacity required to serve annual and design day demand requirements in the gas supply plan.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

4

Reference:

GSP, p. 48

Question(s):

a) Please confirm that Enbridge Gas has already reduced its market-based storage contracts to implement the Phase 2 decision.

b) Please provide a list of the storage contracts that were not renewed and explain how Enbridge Gas determined which contracts to not renew.

Response:

a) Confirmed.

b) As discussed in the Company's 5-Year Gas Supply Plan, Enbridge Gas historically contracted for 26 PJ of market-based storage services, 10 PJ of which was set to expire on March 31, 2025.[1] Market-based storage service contracts typically do not include any renewal rights and thus Enbridge Gas was preparing to procure replacement storage services for up to 10 PJ through its blind RFP process in 2024. Following the OEB's approval of the 2024 Rebasing Phase 2 Settlement Agreement[2] the total market-based storage requirement was reduced to 18 PJ. As a result, Enbridge Gas reduced the volume of market-based storage services being sought from 10 PJ to 2 PJ. Table 1 summarizes the market-based storage service contracts that expired March 31, 2025, including the contracted capacity, and term.

[1] EB-2025-0065, pp.7-8 & 48.
[2] EB-2024-0111, Settlement Agreement, November 29, 2024.

Table 1
Expired Market-Based Storage Contracts as of March 31, 2025

Line No.	Contract	Capacity (PJ)	Start Date	Expiry Date
	(a)	(b)	(c)	(b)
1	Contract 1	4	April 1, 2020	March 31, 2025
2	Contract 2	3	April 1, 2022	March 31, 2025
3	Contract 3	1	April 1, 2023	March 31, 2025
4	Contract 4	2	April 1, 2024	March 31, 2025
5	Total	10		

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe Research Foundation (EP)

Interrogatory

Issue:

4

Reference:

Page 20, Table 1, Annual Demand Forecast, Page 20

Preamble:

The Minister of Energy and Electrification (now Minister of Energy, Northern Development and Mines) issued his renewed Letter of Direction to the OEB on December 19, 2024, which included a number of expectations and directives. The OEB, as of the time of filing had 32 active policy initiatives and consultations. Many of these will require electricity distributors to make large expenditures with no offsetting increases in revenues, such as investments in system hardening, and in facilitating connections of customers with residential rooftop solar generators and home batteries. Similar initiatives have resulted in large electricity cost increases in other jurisdictions. Energy Probe believes that home heating with electricity will become even more costly in comparison with natural gas over the forecast period and that the decline that Enbridge Gas is predicting will not happen.

Question(s):

a) What is the probability and the 95% confidence interval of the Annual Demand Forecast shown in Table 1?

b) Has Enbridge Gas considered what it would need to do if there is growth instead of decline in demand over the forecast period?

Response:

a) The confidence interval of the annual demand forecast cannot be constructed due to the combination of different methodologies and adjustments made for additional factors. First, the annual demand forecast in Table 1 is the sum of the general service volume and contract market volume forecasts. Second, the general service

volume forecast is also determined by combining customer and average use per customer forecasts, each of which uses different methodologies with its own assumptions and biases. Finally, there are adjustments made to the forecasts such as future Demand Side Management (DSM) and Energy Transition which further complicates calculating a confidence interval for the forecast.

To be responsive to this interrogatory, using the actual normalized general service volumes from 2008 to 2023, Enbridge Gas calculated the 95% confidence interval of the mean on a best-efforts basis. The 95% confidence interval for volumes was found to be (13,505 10^6m^3, 16,025 10^6m^3). In the forecasting period of 2025 to 2030, the average general service volume forecast is 15,331 10^6m^3 which falls between lower and upper bound in the calculated confidence interval.

b) The 5-Year Gas Supply Plan outlines a comprehensive strategy to manage anticipated growth in demand across its service territories. Historically, Enbridge Gas has utilized a combination of firm transportation contracts, storage, third-party assignments, varying levels of peaking supplies and flexible commodity procurement strategies to meet varying levels of demand requirements. As noted in the 5-Year Gas Supply Plan[1], scarcity of existing pipeline transportation capacity continues to be a concern as Enbridge Gas has observed that available capacity has become increasingly scarce. Enbridge Gas maintains flexibility in its procurement strategy, allowing it to adjust commodity sourcing based on pipeline availability and market conditions and continues to work with upstream pipelines to secure capacity when it is made available in the market.

[1] EB-2025-0065, p.30.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

4

Reference:

A final decision from the OEB on the Phase 2 issue of the procurement of lower-carbon energy as part of the gas supply commodity portfolio, including the Lower-Carbon Voluntary Program, remains outstanding as of the time of this filing. [Page 8]. The OEB Decision was issued in May 2025 following Enbridge filing of the gas supply plan.

Question(s):

a) What plans does Enbridge have for the procurement or support for RNG or hydrogen.

b) Please provide a summary of the support activities (including marketing materials) provided by Enbridge to support RNG production in Ontario.

c) Does Enbridge propose to change the RNG scorecard metric? If not, why not? If yes, please provide the new proposed metric and target.

Response:

a) At this time, Enbridge Gas intends to continue its Voluntary RNG program (VRNG), including supporting additional customer enrollment and the procurement of resulting RNG volumes as discussed in the 5-Year Gas Supply Plan.[1] Similarly, the Company intends to continue its Low Carbon Energy Project (LCEP), including procurement and blending of up to 2% hydrogen in Markham, Ontario as discussed in the 5-Year Gas Supply Plan.[2] Aside from the Hydrogen Blending Grid Study initiated in 2023 and evaluating the possibility of increasing the % blend in Markham up to 5% by volume for the remaining life of the pilot project [3] the Company currently does not have any further plans for the procurement of RNG or hydrogen.

[1] EB-2025-0065, p.70.
[2] EB-2025-0065, p.71.
[3] EB-2024-0111, Exhibit I.1.1-ED-57.

b) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding.

There is no issue in this proceeding, or as part of Issue 6 (as referenced by Pollution Probe) or elsewhere in the Issues List as to Enbridge Gas's activities in promoting or supporting the production of RNG in Ontario.

c) No. Enbridge Gas intends to continue with the current performance metric as the Company plans to continue the current VRNG program without change and has no plans for additional RNG procurement beyond that required to support the VRNG program.

ENBRIDGE GAS INC.

Answer to Interrogatory from
School Energy Coalition (SEC)

Interrogatory

Issue:

4

Reference:

[p.49]

Question(s):

With respect to the procurement of the commodity:

a. Please explain the process of how Enbridge procures commodity and the types of terms which are often included (i.e. length of contract, pricing, etc.).

b. For the 2024/2025 year, please provide a table that includes each commodity purchased with all key information, including but not limited to, producer, point of supply, quantity, and price. Please provide the response in Excel format.

Response:

a) As described in the Company's 5-Year Gas Supply Plan,[1]

> Enbridge Gas's monthly procurement plans layer in annual, seasonal, and monthly purchases as well as certain short-term purchases to provide flexibility to adjust for variation to forecast or market volatility. Gas supply for all rate zones is purchased using both fixed and indexed price contracts. Enbridge Gas primarily uses an RFP process (written and verbal), and electronic gas trading platforms under both the NAESB contract and a Gas Electronic Data Interchange contract. The Company also infrequently transacts limited straight purchases directly with a counterparty (e.g., variable supply for fuel).

[1] EB-2025-0065, p.79.

Please also see response at Exhibit I.1-SEC-1, Attachment 1, for a copy of Enbridge Gas's Gas Supply Procurement Policies and Practices manual.

b) Please see Attachment 1 for a detailed listing of all transactions scheduled to flow during the 2024/25 gas year, as of August 31, 2025.

Confidential information contained in Attachment 1 has been redacted, and an unredacted version has been filed in accordance with the OEB's Practice Direction on Confidential Filings. The confidential information that is redacted relates to identification of counterparties and volume and pricing information. This is non-public information that, if published, could provide advantages to bidders and suppliers in future transactions and prejudice Enbridge Gas's competitive position in negotiating future supply arrangements.

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	[redacted]	AECO	NIT	11/1/2024	10/31/2025	[redacted]	AECO 7A Monthly - CGPR	[redacted]	[redacted]
2		AECO	NIT	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
3		AECO	NIT	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
4		AECO	NIT	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
5		AECO	NIT	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
6		AECO	NIT	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
7		AECO	NIT	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
8		AECO	NIT	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
9		AECO	NIT	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
10		AECO	NIT	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
11		AECO	NIT	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
12		AECO	NIT	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
13		AECO	NIT	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
14		AECO	NIT	4/1/2025	10/31/2025		AECO Daily 5a		
15		AECO	NIT	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
16		AECO	NIT	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
17		AECO	NIT	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
18		AECO	NIT	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
19		AECO	NIT	4/1/2025	10/31/2025		AECO Daily 5a		
20		AECO	NIT	4/1/2025	10/31/2025		AECO Daily 5a		
21		AECO	NIT	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
22		AECO	NIT	4/1/2025	4/30/2025		AECO Daily 5a		
23		AECO	NIT	4/1/2025	4/30/2025		AECO Daily 5a		
24		AECO	NIT	5/1/2025	5/31/2025		AECO Daily 5a		
25		AECO	NIT	5/1/2025	5/31/2025		AECO Daily 5a		
26		AECO	NIT	6/1/2025	6/30/2025		AECO 7A Monthly - CGPR		
27		AECO	NIT	6/1/2025	6/30/2025		AECO 7A Monthly - CGPR		
28		AECO	NIT	7/1/2025	7/31/2025		AECO 7A Monthly - CGPR		
29		AECO	NIT	7/1/2025	7/31/2025		AECO Daily 5a		
30		AECO	NIT	7/1/2025	7/31/2025		AECO Daily 5a		
31		AECO	NIT	8/1/2025	8/31/2025		AECO 7A Monthly - CGPR		
32		AECO	NIT	8/1/2025	8/31/2025		AECO Daily 5a		
33		AECO	NIT	9/1/2025	9/30/2025		AECO 7A Monthly - CGPR		
34		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		NYMEX Last Day		
35		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		FERC DSP Monthly		
36		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		FERC DSP Monthly		
37		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		NYMEX Last Day		
38		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		NYMEX Last Day		
39		CHIPPAWA	CHIPPAWA	11/1/2024	10/31/2025		DAWN DAILY NGX		
40		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
41		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
42		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
43		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
44		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
45		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
46		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
47		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
48	[redacted]	DAWN	DAWN	12/1/2024	2/28/2025	[redacted]	NYMEX Last Day	[redacted]	[redacted]
49		DAWN	DAWN	12/1/2024	2/28/2025		NYMEX Last Day		
50		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
51		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
52		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
53		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
54		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
55		DAWN	DAWN	11/1/2024	3/31/2025		NYMEX Last Day		
56		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
57		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
58		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
59		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
60		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
61		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
62		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
63		DAWN	DAWN	12/1/2024	1/31/2025		NYMEX Last Day		
64		DAWN	DAWN	11/1/2024	11/30/2024		NYMEX Last Day		
65		DAWN	DAWN	11/1/2024	11/30/2024		NYMEX Last Day		
66		DAWN	DAWN	11/1/2024	11/30/2024		NYMEX Last Day		
67		DAWN	DAWN	11/1/2024	11/30/2024		NYMEX Last Day		
68		DAWN	DAWN	11/5/2024	11/30/2024		Fixed Price		
69		DAWN	DAWN	11/5/2024	11/30/2024		Fixed Price		
70		DAWN	DAWN	12/1/2024	12/31/2024		Fixed Price		
71		DAWN	DAWN	12/1/2024	12/31/2024		Fixed Price		
72		DAWN	DAWN	12/1/2024	12/31/2024		Fixed Price		
73		DAWN	DAWN	12/1/2024	12/31/2024		Fixed Price		
74		DAWN	DAWN	12/1/2024	12/31/2024		Fixed Price		
75		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
76		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
77		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
78		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
79		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
80		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
81		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
82		DAWN	DAWN	12/4/2024	12/31/2024		Fixed Price		
83		DAWN	DAWN	12/11/2024	12/31/2024		Fixed Price		
84		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
85		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
86		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
87		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
88		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
89		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
90		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
91		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
92		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
93		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
94		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
95	[redacted]	DAWN	DAWN	1/1/2025	1/31/2025	[redacted]	NYMEX Last Day	[redacted]	[redacted]
96		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
97		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
98		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
99		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
100		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
101		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
102		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
103		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
104		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
105		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
106		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
107		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
108		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
109		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
110		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
111		DAWN	DAWN	1/1/2025	1/31/2025		NYMEX Last Day		
112		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
113		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
114		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
115		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
116		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
117		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
118		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
119		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
120		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
121		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
122		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
123		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
124		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
125		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
126		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
127		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
128		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
129		DAWN	DAWN	2/7/2025	2/28/2025		Fixed Price		
130		DAWN	DAWN	2/7/2025	2/28/2025		Fixed Price		
131		DAWN	DAWN	2/7/2025	2/28/2025		Fixed Price		
132		DAWN	DAWN	2/7/2025	2/28/2025		Fixed Price		
133		DAWN	DAWN	2/7/2025	2/28/2025		Fixed Price		
134		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
135		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
136		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
137		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
138		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
139		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
140		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
141		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
142	[redacted]	DAWN	DAWN	2/14/2025	2/28/2025	[redacted]	Fixed Price	[redacted]	[redacted]
143		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
144		DAWN	DAWN	2/14/2025	2/28/2025		Fixed Price		
145		DAWN	DAWN	4/9/2025	4/30/2025		Fixed Price		
146		DAWN	DAWN	4/9/2025	4/30/2025		Fixed Price		
147		DAWN	DAWN	5/1/2025	5/31/2025		Fixed Price		
148		DAWN	DAWN	5/1/2025	5/31/2025		Fixed Price		
149		DAWN	DAWN	5/1/2025	5/31/2025		Fixed Price		
150		DAWN	DAWN	5/1/2025	5/31/2025		Fixed Price		
151		DAWN	DAWN	6/1/2025	6/30/2025		Fixed Price		
152		DAWN	DAWN	6/1/2025	6/30/2025		Fixed Price		
153		DAWN	DAWN	6/14/2025	6/30/2025		Fixed Price		
154		DAWN	DAWN	6/14/2025	6/30/2025		Fixed Price		
155		DAWN	DAWN	6/14/2025	6/30/2025		Fixed Price		
156		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
157		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
158		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
159		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
160		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
161		DAWN	DAWN	7/1/2025	7/31/2025		NYMEX Last Day		
162		DAWN	DAWN	7/1/2025	7/31/2025		Fixed Price		
163		DAWN	DAWN	7/1/2025	7/31/2025		Fixed Price		
164		DAWN	DAWN	7/1/2025	7/31/2025		Fixed Price		
165		DAWN	DAWN	7/1/2025	7/31/2025		Fixed Price		
166		DAWN	DAWN	7/1/2025	7/31/2025		Fixed Price		
167		DAWN	DAWN	8/1/2025	8/31/2025		NYMEX Last Day		
168		DAWN	DAWN	8/1/2025	8/31/2025		NYMEX Last Day		
169		DAWN	DAWN	8/1/2025	8/31/2025		NYMEX Last Day		
170		DAWN	DAWN	8/6/2025	8/31/2025		Fixed Price		
171		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
172		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
173		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
174		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
175		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
176		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
177		DAWN	DAWN	9/1/2025	9/30/2025		NYMEX Last Day		
178		DAWN	DAWN	2/1/2025	2/28/2025		NYMEX Last Day		
179		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
180		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
181		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
182		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
183		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
184		NEXUS	CLARINGTON	11/1/2024	10/31/2025		IFERC TETCO M2 Monthly		
185		NEXUS	CLARINGTON	11/1/2024	3/31/2025		IFERC TETCO M2 Monthly		
186		NEXUS	CLARINGTON	11/1/2024	3/31/2025		IFERC TETCO M2 Monthly		
187		NEXUS	CLARINGTON	11/1/2024	3/31/2025		IFERC TETCO M2 Monthly		
188		NEXUS	CLARINGTON	11/1/2024	11/30/2024		IFERC TETCO M2 Monthly		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
189		NEXUS	CLARINGTON	11/1/2024	11/30/2024		IFERC TETCO M2 Monthly		
190		NEXUS	CLARINGTON	11/1/2024	11/30/2024		IFERC TETCO M2 Monthly		
191		NEXUS	CLARINGTON	12/1/2024	12/31/2024		IFERC TETCO M2 Monthly		
192		NEXUS	CLARINGTON	12/1/2024	12/31/2024		IFERC TETCO M2 Monthly		
193		NEXUS	CLARINGTON	12/1/2024	12/31/2024		IFERC TETCO M2 Monthly		
194		NEXUS	CLARINGTON	1/1/2025	1/31/2025		IFERC TETCO M2 Monthly		
195		NEXUS	CLARINGTON	1/1/2025	1/31/2025		IFERC TETCO M2 Monthly		
196		NEXUS	CLARINGTON	1/1/2025	1/31/2025		IFERC TETCO M2 Monthly		
197		NEXUS	CLARINGTON	4/1/2025	10/31/2025		GAS DAILY TETCO M2		
198		NEXUS	CLARINGTON	4/1/2025	10/31/2025		GAS DAILY TETCO M2		
199		NEXUS	CLARINGTON	4/1/2025	10/31/2025		GAS DAILY TETCO M2		
200		NEXUS	CLARINGTON	2/1/2025	2/28/2025		IFERC TETCO M2 Monthly		
201		NEXUS	CLARINGTON	2/1/2025	2/28/2025		IFERC TETCO M2 Monthly		
202		NEXUS	CLARINGTON	2/1/2025	2/28/2025		IFERC TETCO M2 Monthly		
203		NEXUS	CLARINGTON	3/1/2025	3/31/2025		IFERC TETCO M2 Monthly		
204		NEXUS	CLARINGTON	3/1/2025	3/31/2025		IFERC TETCO M2 Monthly		
205		NEXUS	CLARINGTON	3/1/2025	3/31/2025		IFERC TETCO M2 Monthly		
206		NEXUS	CLARINGTON	4/1/2025	4/30/2025		GAS DAILY TETCO M2		
207		NEXUS	CLARINGTON	4/1/2025	4/30/2025		GAS DAILY TETCO M2		
208		NEXUS	CLARINGTON	4/1/2025	4/30/2025		GAS DAILY TETCO M2		
209		NEXUS	CLARINGTON	5/1/2025	5/31/2025		GAS DAILY TETCO M2		
210		NEXUS	CLARINGTON	5/1/2025	5/31/2025		GAS DAILY TETCO M2		
211		NEXUS	CLARINGTON	5/1/2025	5/31/2025		GAS DAILY TETCO M2		
212		NEXUS	CLARINGTON	6/1/2025	6/30/2025		IFERC TETCO M2 Monthly		
213		NEXUS	CLARINGTON	6/1/2025	6/30/2025		IFERC TETCO M2 Monthly		
214		NEXUS	CLARINGTON	6/1/2025	6/30/2025		IFERC TETCO M2 Monthly		
215		NEXUS	CLARINGTON	7/1/2025	7/31/2025		GAS DAILY TETCO M2		
216		NEXUS	CLARINGTON	7/1/2025	7/31/2025		GAS DAILY TETCO M2		
217		NEXUS	CLARINGTON	7/1/2025	7/31/2025		GAS DAILY TETCO M2		
218		NEXUS	CLARINGTON	8/1/2025	8/31/2025		GAS DAILY TETCO M2		
219		NEXUS	CLARINGTON	8/1/2025	8/31/2025		GAS DAILY TETCO M2		
220		NEXUS	CLARINGTON	8/1/2025	8/31/2025		GAS DAILY TETCO M2		
221		NEXUS	CLARINGTON	9/1/2025	9/19/2025		GAS DAILY TETCO M2		
222		NEXUS	CLARINGTON	9/1/2025	9/19/2025		GAS DAILY TETCO M2		
223		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
224		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
225		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
226		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		
227		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		
228		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		
229		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
230		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
231		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
232		NEXUS	KENSINGTON	11/1/2024	10/31/2025		IFERC DSP Monthly		
233		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		
234		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		
235		NEXUS	KENSINGTON	11/1/2024	3/31/2025		IFERC DSP Monthly		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
236		NEXUS	KENSINGTON	4/1/2025	10/31/2025		IFERC DSP Monthly		
237		NEXUS	KENSINGTON	4/1/2025	10/31/2025		IFERC DSP Monthly		
238		NEXUS	KENSINGTON	4/1/2025	10/31/2025		IFERC DSP Monthly		
239		NEXUS	KENSINGTON	4/1/2025	10/31/2025		Tennessee Zone4-200leg GD		
240		NEXUS	KENSINGTON	4/1/2025	10/31/2025		Tennessee Zone4-200leg GD		
241		NEXUS	KENSINGTON	4/1/2025	10/31/2025		Tennessee Zone4-200leg GD		
242		NEXUS	KENSINGTON	4/1/2025	10/31/2025		Tennessee Zone4-200leg GD		
243		NEXUS	KENSINGTON	4/1/2025	10/31/2025		Tennessee Zone4-200leg GD		
244		NIAGARA	NIAGARA	11/1/2023	10/31/2025		Dawn Monthly - Inside FERC		
245		NIAGARA	NIAGARA	11/1/2024	10/31/2025		NYMEX Last Day		
246		NIAGARA	NIAGARA	11/1/2024	10/31/2025		NYMEX Last Day		
247		NIAGARA	NIAGARA	11/1/2024	3/31/2025		NYMEX Last Day		
248		NIAGARA	NIAGARA	11/1/2024	3/31/2025		NYMEX Last Day		
249		NIAGARA	NIAGARA	11/1/2024	3/31/2025		NYMEX Last Day		
250		NIAGARA	NIAGARA	11/1/2024	10/31/2025		Dawn Monthly - Inside FERC		
251		NIAGARA	NIAGARA	12/1/2024	3/31/2029		Dawn Monthly - Inside FERC		
252		NIAGARA	NIAGARA	4/1/2025	4/30/2025		NYMEX Last Day		
253		NIAGARA	NIAGARA	4/1/2025	4/30/2025		NYMEX Last Day		
254		NIAGARA	NIAGARA	5/1/2025	5/31/2025		NYMEX Last Day		
255		NIAGARA	NIAGARA	5/1/2025	5/31/2025		NYMEX Last Day		
256		NIAGARA	NIAGARA	6/1/2025	6/30/2025		NYMEX Last Day		
257		NIAGARA	NIAGARA	6/1/2025	6/30/2025		NYMEX Last Day		
258		NIAGARA	NIAGARA	7/1/2025	7/31/2025		NYMEX Last Day		
259		NIAGARA	NIAGARA	7/1/2025	7/31/2025		NYMEX Last Day		
260		NIAGARA	NIAGARA	7/1/2025	7/31/2025		NYMEX Last Day		
261		NIAGARA	NIAGARA	8/1/2025	8/31/2025		NYMEX Last Day		
262		NIAGARA	NIAGARA	8/1/2025	8/31/2025		NYMEX Last Day		
263		NIAGARA	NIAGARA	8/1/2025	8/31/2025		NYMEX Last Day		
264		NIAGARA	NIAGARA	8/1/2025	8/31/2025		NYMEX Last Day		
265		NIAGARA	NIAGARA	9/1/2025	9/30/2025		NYMEX Last Day		
266		PEAKING	ENBRIDGE CDA	12/1/2024	3/31/2025		Iroquois - Gas Daily		
267		PEAKING	ENBRIDGE EDA	12/1/2024	3/31/2025		Iroquois - Gas Daily		
268		PEAKING	UNION EDA	12/1/2024	3/31/2025		Iroquois - Gas Daily		
269		PEPL	PEPL FZ	11/1/2024	3/31/2025		NYMEX Last Day		
270		PEPL	PEPL FZ	11/1/2024	3/31/2025		NYMEX Last Day		
271		PEPL	PEPL FZ	11/1/2024	11/30/2024		NYMEX Last Day		
272		PEPL	PEPL FZ	11/1/2024	11/30/2024		NYMEX Last Day		
273		PEPL	PEPL FZ	12/1/2024	12/31/2024		NYMEX Last Day		
274		PEPL	PEPL FZ	12/1/2024	12/31/2024		NYMEX Last Day		
275		PEPL	PEPL FZ	1/1/2025	1/31/2025		NYMEX Last Day		
276		PEPL	PEPL FZ	1/1/2025	1/31/2025		NYMEX Last Day		
277		PEPL	PEPL FZ	2/1/2025	2/28/2025		NYMEX Last Day		
278		PEPL	PEPL FZ	3/1/2025	3/31/2025		NYMEX Last Day		
279		PEPL	PEPL FZ	3/1/2025	3/31/2025		NYMEX Last Day		
280		PEPL	PEPL FZ	6/1/2025	6/30/2025		NYMEX Last Day		
281		PEPL	PEPL FZ	6/1/2025	6/30/2025		NYMEX Last Day		
282		PEPL	PEPL FZ	7/1/2025	7/31/2025		NYMEX Last Day		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
283	[redacted]	PEPL	PEPL FZ	7/1/2025	7/31/2025	[redacted]	NYMEX Last Day	[redacted]	[redacted]
284		PEPL	PEPL FZ	7/1/2025	7/31/2025		NYMEX Last Day		
285		PEPL	PEPL FZ	7/1/2025	7/31/2025		NYMEX Last Day		
286		PEPL	PEPL FZ	8/1/2025	8/31/2025		NYMEX Last Day		
287		PEPL	PEPL FZ	8/1/2025	8/31/2025		NYMEX Last Day		
288		PEPL	PEPL FZ	8/1/2025	8/31/2025		NYMEX Last Day		
289		PEPL	PEPL FZ	9/1/2025	9/30/2025		NYMEX Last Day		
290		PEPL	PEPL FZ	9/1/2025	9/30/2025		NYMEX Last Day		
291		PEPL	PEPL FZ	9/1/2025	9/30/2025		NYMEX Last Day		
292		TCPL	EMERSON II	11/1/2024	11/30/2024		Fixed Price		
293		TCPL	EMERSON II	12/1/2024	12/31/2024		Fixed Price		
294		TCPL	EMERSON II	1/1/2025	1/31/2025		Fixed Price		
295		TCPL	EMERSON II	2/1/2025	2/28/2025		Fixed Price		
296		TCPL	EMERSON II	3/1/2025	3/31/2025		Fixed Price		
297		TCPL	EMERSON II	4/1/2025	4/30/2025		Fixed Price		
298		TCPL	EMERSON II	5/1/2025	5/31/2025		Fixed Price		
299		TCPL	EMERSON II	6/1/2025	6/30/2025		Fixed Price		
300		TCPL	EMERSON II	7/1/2025	7/31/2025		Fixed Price		
301		TCPL	EMERSON II	8/1/2025	8/31/2025		Fixed Price		
302		TCPL	EMERSON II	9/1/2025	9/30/2025		Fixed Price		
303		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
304		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
305		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
306		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
307		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
308		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
309		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
310		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
311		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
312		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
313		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 7A Monthly - CGPR		
314		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
315		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
316		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
317		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
318		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
319		TCPL	EMPRESS	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
320		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 5a + Nova		
321		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 5a + Nova		
322		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 5a + Nova		
323		TCPL	EMPRESS	11/1/2024	10/31/2025		AECO 5a + Nova		
324		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
325		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
326		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
327		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
328		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
329		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
330	[redacted]	TCPL	EMPRESS	11/1/2024	11/30/2024	[redacted]	AECO 7A Monthly - CGPR	[redacted]	[redacted]
331		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
332		TCPL	EMPRESS	11/1/2024	11/30/2024		AECO 5a + Nova		
333		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
334		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
335		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
336		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
337		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
338		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
339		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
340		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
341		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 7A Monthly - CGPR		
342		TCPL	EMPRESS	12/1/2024	12/31/2024		AECO 5a + Nova		
343		TCPL	EMPRESS	1/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
344		TCPL	EMPRESS	1/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
345		TCPL	EMPRESS	1/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
346		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
347		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
348		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
349		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
350		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
351		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
352		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
353		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
354		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
355		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
356		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
357		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
358		TCPL	EMPRESS	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
359		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
360		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
361		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
362		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
363		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
364		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 7A Monthly - CGPR		
365		TCPL	EMPRESS	2/1/2025	2/28/2025		AECO 5a + Nova		
366		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
367		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO Daily 5a		
368		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
369		TCPL	EMPRESS	4/1/2025	10/31/2025		AECO 7A Monthly - CGPR		
370		TCPL	EMPRESS	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
371		TCPL	EMPRESS	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
372		TCPL	EMPRESS	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
373		TCPL	EMPRESS	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
374		TCPL	EMPRESS	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
375		TCPL	EMPRESS	4/1/2025	4/30/2025		AECO Daily 5a		
376		TCPL	EMPRESS	4/1/2025	4/30/2025		AECO Daily 5a		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
377	[redacted]	TCPL	EMPRESS	4/1/2025	4/30/2025	[redacted]	AECO Daily 5a	[redacted]	[redacted]
378		TCPL	EMPRESS	4/1/2025	4/30/2025		AECO Daily 5a		
379		TCPL	EMPRESS	4/1/2025	4/30/2025		AECO 5a + Nova		
380		TCPL	EMPRESS	4/1/2025	4/30/2025		AECO Daily 5a		
381		TCPL	EMPRESS	5/1/2025	5/31/2025		AECO Daily 5a		
382		TCPL	EMPRESS	5/1/2025	5/31/2025		AECO Daily 5a		
383		TCPL	EMPRESS	5/1/2025	5/31/2025		AECO 7A Monthly - CGPR		
384		TCPL	EMPRESS	5/1/2025	5/31/2025		AECO 7A Monthly - CGPR		
385		TCPL	EMPRESS	5/1/2025	5/31/2025		AECO Daily 5a		
386		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
387		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
388		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
389		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
390		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
391		TCPL	EMPRESS	6/1/2025	6/30/2025		AECO Daily 5a		
392		TCPL	EMPRESS	7/1/2025	7/31/2025		AECO Daily 5a		
393		TCPL	EMPRESS	7/1/2025	7/31/2025		AECO 7A Monthly - CGPR		
394		TCPL	EMPRESS	7/1/2025	7/31/2025		AECO 7A Monthly - CGPR		
395		TCPL	EMPRESS	7/1/2025	7/31/2025		AECO Daily 5a		
396		TCPL	EMPRESS	7/1/2025	7/31/2025		AECO Daily 5a		
397		TCPL	EMPRESS	8/1/2025	8/31/2025		AECO 7A Monthly - CGPR		
398		TCPL	EMPRESS	8/1/2025	8/31/2025		AECO Daily 5a		
399		TCPL	EMPRESS	8/1/2025	8/31/2025		AECO 7A Monthly - CGPR		
400		TCPL	EMPRESS	8/1/2025	8/31/2025		AECO Daily 5a		
401		TCPL	EMPRESS	8/1/2025	8/31/2025		AECO Daily 5a		
402		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO Daily 5a		
403		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO Daily 5a		
404		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO 7A Monthly - CGPR		
405		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO Daily 5a		
406		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO Daily 5a		
407		TCPL	EMPRESS	9/1/2025	9/30/2025		AECO Daily 5a		
408		TCPL	SUFFIELD	7/1/2025	7/31/2025		AECO Daily 5a		
409		TCPL	SUFFIELD	8/1/2025	8/31/2025		AECO Daily 5a		
410		TCPL	SUFFIELD 2	11/1/2024	3/31/2025		AECO 7A Monthly - CGPR		
411		TCPL	SUFFIELD 2	11/1/2024	11/30/2024		AECO 7A Monthly - CGPR		
412		TCPL	SUFFIELD 2	1/1/2025	1/31/2025		AECO 7A Monthly - CGPR		
413		TCPL	SUFFIELD 2	3/1/2025	3/31/2025		AECO 7A Monthly - CGPR		
414		TCPL	SUFFIELD 2	4/1/2025	4/30/2025		AECO Daily 5a		
415		TCPL	SUFFIELD 2	5/1/2025	5/31/2025		AECO Daily 5a		
416		TCPL	SUFFIELD 2	6/1/2025	6/30/2025		AECO Daily 5a		
417		TCPL	SUFFIELD 2	9/1/2025	9/30/2025		AECO Daily 5a		
418		VECTOR	ACE	4/1/2025	10/31/2025		NYMEX Last Day		
419		VECTOR	ACE	4/1/2025	10/31/2025		NYMEX Last Day		
420		VECTOR	ACE	4/1/2025	10/31/2025		NYMEX Last Day		
421		VECTOR	ACE	4/1/2025	10/31/2025		Chicago Daily - Gas Daily		
422		VECTOR	ACE	4/1/2025	10/31/2025		Chicago Daily - Gas Daily		
423		VECTOR	ACE	4/1/2025	10/31/2025		Chicago Daily - Gas Daily		

Gas Supply Purchases for November 1, 2024 to October 31, 2025 as of August 31, 2025

Line No.	Supplier Name	Pipeline/ Location	Trading Location	Deal Start Date	Deal End Date	Daily Quantity	Pricing Index	Surcharge/Discount (per unit)	Demand Charge (total)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
424	[redacted]	VECTOR	ACE	4/1/2025	4/30/2025	[redacted]	Chicago Daily - Gas Daily	[redacted]	[redacted]
425		VECTOR	ACE	4/1/2025	4/30/2025		Chicago Daily - Gas Daily		
426		VECTOR	ACE	5/1/2025	5/31/2025		Chicago Daily - Gas Daily		
427		VECTOR	ACE	5/1/2025	5/31/2025		NYMEX Last Day		
428		VECTOR	ACE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
429		VECTOR	ACE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
430		VECTOR	ACE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
431		VECTOR	ACE	7/1/2025	7/31/2025		Chicago Daily - Gas Daily		
432		VECTOR	ACE	7/1/2025	7/31/2025		Chicago Daily - Gas Daily		
433		VECTOR	ACE	7/1/2025	7/31/2025		Chicago Daily - Gas Daily		
434		VECTOR	ACE	8/1/2025	8/31/2025		Chicago Daily - Gas Daily		
435		VECTOR	ACE	8/1/2025	8/31/2025		NYMEX Last Day		
436		VECTOR	ALLIANCE	4/1/2025	4/30/2025		Chicago Daily - Gas Daily		
437		VECTOR	ALLIANCE	5/1/2025	5/31/2025		NYMEX Last Day		
438		VECTOR	ALLIANCE	5/1/2025	5/31/2025		NYMEX Last Day		
439		VECTOR	ALLIANCE	5/1/2025	5/31/2025		Chicago Daily - Gas Daily		
440		VECTOR	ALLIANCE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
441		VECTOR	ALLIANCE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
442		VECTOR	ALLIANCE	6/1/2025	6/30/2025		Chicago Daily - Gas Daily		
443		VECTOR	ALLIANCE	8/1/2025	8/31/2025		NYMEX Last Day		
444		VECTOR	ALLIANCE	8/1/2025	8/31/2025		NYMEX Last Day		
445		VECTOR	ALLIANCE	9/1/2025	9/30/2025		Chicago Daily - Gas Daily		
446		VECTOR	ALLIANCE	9/1/2025	9/30/2025		Chicago Daily - Gas Daily		
447		VECTOR	NORTHERN BORDER IC	4/1/2025	4/30/2025		Chicago Daily - Gas Daily		
448		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
449		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
450		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
451		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
452		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
453		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
454		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		
455		VECTOR	ST. CLAIR (U.S.)	11/1/2024	3/31/2025		NYMEX Last Day		

ENBRIDGE GAS INC.

Answer to Interrogatory from
Three Fires Group Inc. (Three Fires) / Minogi Corp. (Minogi)

Interrogatory

Issue:

4

Reference:

- GSP, p. 71
- EB-2024-0111, Decision and Order (the "Decision"), pp. 25-26, 34
- GSP, Appendix E.

Preamble:

Phase 2 of Enbridge Gas's 2024 Rebasing Application includes a Lower-Carbon Voluntary Program ("LCVP") proposal to procure lower-carbon energy, with a focus on RNG, as part of the gas supply commodity portfolio beginning in 2026. EGI notes that if approved by the OEB, this program will replace the existing VRNG program.

In the OEB's Decision and Order in the Phase 2 rebasing proceeding, the OEB granted permission to EGI to establish a voluntary program to buy
RNG and sell it to large volume customers on a voluntary basis but denied the request to use its small business and residential customer base to provide a financial backstop for the voluntary program.

The OEB also acknowledged that reconciliation is important and ongoing and the Indigenous Participation Proposal for RNG procurement would contribute to that.

Question(s):

a) Please provide any updates to the GSP, generally, and section 6.3 of the GSP, specifically, as a result of the Decision.

b) Please discuss how the Decision impacts the LCVP proposal and whether EGI intends to establish the LCVP or any other RNG procurement program.

c) If EGI intends to establish the LCVP, please provide EGI's current position on the implementation of the Indigenous Participation Proposal set out in the Decision. If EGI does not intend to establish the LCVP, please indicate whether EGI will consider implementing the Indigenous Participation Proposal and/or incorporate Indigenous economic reconciliation objectives as part of any procurement of RNG.

d) In the event that EGI adopts the Indigenous Participation Proposal, please discuss whether there are any reasons and/or barriers to EGI including a corresponding metric in its performance metrics in Appendix E. Please include EGI's opinion on whether tracking EGI's performance related to RNG procurement from Indigenous-owned entities and First Nations would be helpful for EGI and its stakeholders. If EGI does not believe it would be helpful or useful for EGI and/or stakeholders, please explain why not.

Response:

a-b) Please see response at Exhibit I.2-VECC-8, and Exhibit I.2-TFG/M-2, part a).

c-d) Enbridge Gas supported the Indigenous participation proposal as part of its Lower-Carbon Voluntary Program (LCVP) and related RNG requests in Phase 2 of the 2024 Rebasing Application[1]. The Company currently has no plans to implement the LCVP in the manner approved by the OEB and does not intend to incorporate the Indigenous participation proposal as part of the small volumes of RNG expected to be procured under the current Voluntary RNG program.

[1] EB-2024-0111.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue:

5

Reference:

GSP, p. 25
EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, p. 32

Question(s):

a) Please confirm that the design day demand in the GSP (p. 25) does not reflect unbundled customer demand while the design day demand in EB-2022-0200 does include unbundled demand.

b) Please describe, in detail, all of the factors that result in the difference between the design day demand in the GSP (p. 25) and the design day demand in EB-2022-0200 (Table 3, Exhibit 4, Tab 2, Schedule 3, p. 32).

Response:

a) Confirmed, however unbundled customer demands are always excluded from the design day demands used to prepare the gas supply plan. The total Enbridge Gas design day demand, including unbundled demands, is included in Phase 1 of the 2024 Rebasing Application.[1]

b) The differences between the design day demand in Phase 1 of the 2024 Rebasing Application and the 5-Year Gas Supply Plan are:

- Decrease in design day HDDw for four North Rate Zone delivery areas as described in response at Exhibit I.4-CCC-1.

[1] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, Table 3.

- The design day demands were completed in different budget cycle years. Phase 1 of the 2024 Rebasing Application was prepared in 2022 while the 5-Year Gas Supply Plan was prepared in 2024.
- The design day demands are based on different forecast years. Phase 1 of the 2024 Rebasing Application was W2021/22 while the 5-Year Gas Supply Plan was W2023/24.
- Phase 1 of the 2024 Rebasing Application[2] includes unbundled demand while the 5-Year Gas Supply Plan excludes unbundled demand.

[2] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, Table 3.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe Research Foundation (EP)

Interrogatory

Issue:

5

Reference:

Page 54, footnote 59

Preamble:

“Enbridge Gas will re-evaluate the proportion of reliance on peaking services before November 1 each year as part of its portfolio review, considering market changes and availability of pipeline capacity.”

Question(s):

Is Enbridge Gas concerned that it may be relying too much on peaking services, and the increasing costs of such services due to the lack of availability of pipeline capacity? Please discuss.

Response:

Enbridge Gas prefers to limit the use of peaking services to a maximum of 2% of design day demand per delivery area. This maximum limit helps mitigate the risk of elevated commodity prices and supplier non-performance in the event the peaking service supply is called upon. If Enbridge Gas must contract for peaking services in excess of the preferred limit (due to no available firm transportation capacity), Enbridge Gas is concerned about customer exposure to commodity price spikes customers may incur during peak events and potential impacts to reliability and security of supply.

Commodity price risk

Peaking services offered in the market are often tied to Iroquois pricing, which is historically volatile. Over the past five years, Iroquois has traded as high as $83.63 USD/MMBtu (winter 2022/23), during an extreme cold event, and $34.44 USD/MMbtu in the most recent winter 2024/25. Enbridge Gas has noted pipeline scarcity and impacts

to the gas supply plan and contracting in the 5-Year Gas Supply Plan and previous Annual Updates.[1] Enbridge Gas evaluates the approach to peaking services on an annual basis as part of the preparation of the gas supply plan, taking into consideration all alternatives available to meet demand requirements. Please see response at Exhibit I.2-STAFF-5 for more discussion on pipeline capacity scarcity.

Reliability and security of supply risk

Peaking services are provided by third-party suppliers, placing a reliance on the supplier to deliver during high-demand periods. If a supplier fails to deliver during a critical demand period, Enbridge Gas could be left short of supply. In addition, peaking services do not include renewal rights, and in the current environment of constrained pipeline capacity, the availability of peaking services could be limited. As a result, Enbridge Gas prefers to limit the usage of peaking services to safeguard reliability and ensure secure supply.

[1] EB-2025-0065, p.30.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe Research Foundation (EP)

Interrogatory

Issue:

5

Reference:

Appendix A, Page 13

Preamble:

“Both the WML and ET segments of the TCPL Mainline are nearly fully contracted due to recent increased demand and maintenance activities. As a result, the Company has had limited opportunities to contract for incremental capacity to serve Enbridge Gas delivery areas. However, Enbridge Gas expects that additional existing capacity may become available over the next five years through ECOS and will continue to monitor capacity availability and analyze opportunities as they arise. The scarcity of Mainline capacity is a significant consideration when Enbridge Gas evaluates transportation alternatives.”

Question(s):

a) What would Enbridge Gas do if the additional existing capacity on the TCPL Mainline does not become available over the next five years?

b) What would Enbridge Gas need to do now to ensure that there is adequate capacity for its needs on the TCPL Mainline?

Response:

a-b) Please see response at Exhibit I.2-STAFF-5.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe Research Foundation (EP)

Interrogatory

Issue:

5

Reference:

Appendix H, Pages 1 to 6, Design Day Position, Line 3

Question(s):

a) Please break down the totals for each column in Line 3, In Franchise Supply into its components mentioned in the Note: Dawn, storage, DP deliveries, Crowland, Hagar,delivered supply, etc.

b) Please explain the reasons for the changes shown, specifically in the Enbridge CDA total TJ/d decrease from 2,249.3 in 2024/2025 to 2237.1 in 2025/2026 to 2029/2030 period, and the reasons for the TJ/d changes shown for Union South.

Response:

a) Please see Attachment 1.

b) The decrease in in-franchise supply in the Enbridge CDA over the forecast period is a result of a reduction to direct purchase customer supply (Ontario Transportation Service) as some customers will shift their delivery from the Enbridge CDA to Dawn effective November 1, 2025.

   The increase in in-franchise supply in Union South over the forecast period is a result of increased storage withdrawals[1] and increased direct purchase customer supply (at Dawn and Parkway).

[1] As a result of the 2024 Rebasing Phase 2 Settlement Agreement, Parties agreed that Enbridge Gas will fix its maximum firm withdrawal for in-franchise customers at 4.0 PJ/day which may impact the storage withdrawals in future gas supply plans.

Design Day Position

Line No.	Particulars (TJ/d)	2024/25 Enbridge CDA	2024/25 Union South	2025/26 Enbridge CDA	2025/26 Union South	2026/27 Enbridge CDA	2026/27 Union South	2027/28 Enbridge CDA	2027/28 Union South	2028/29 Enbridge CDA	2028/29 Union South	2029/30 Enbridge CDA	2029/30 Union South
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	Demand												
1	Design Day Demand	3,578.3	3,433.2	3,594.1	3,505.8	3,622.3	3,521.2	3,624.1	3,538.0	3,622.6	3,672.5	3,619.2	3,686.8
	Supply												
2	Great Lakes	-	21.1	-	21.1	-	21.1	-	21.1	-	21.1	-	21.1
	In-franchise Supply:												
3	Crowland storage withdrawal	27.2	-	27.2	-	27.2	-	27.2	-	27.2	-	27.2	-
4	Niagara exchange (local production)	3.0	-	3.0	-	3.0	-	3.0	-	3.0	-	3.0	-
5	Dawn Parkway System (1)	2,194.0	-	2,194.0	-	2,194.0	-	2,194.0	-	2,194.0	-	2,194.0	-
6	Direct purchase customer supply (CDA)	25.2	-	12.8	-	12.8	-	12.8	-	12.8	-	12.8	-
7	Direct purchase customer supply (Dawn)	-	582.5	-	587.6	-	593.1	-	587.7	-	590.8	-	594.6
8	Direct purchase customer supply (Parkway)	-	228.2	-	226.5	-	224.4	-	264.8	-	299.5	-	299.0
9	Non-obligated deliveries (Rate T2)	-	368.1	-	368.1	-	368.1	-	368.1	-	368.1	-	368.1
10	Dawn storage withdrawal (1)	-	1,938.0	-	2,007.2	-	2,019.3	-	2,001.0	-	2,097.8	-	2,108.6
	In-franchise Supply Total	2,249.3	3,116.9	2,237.1	3,189.4	2,237.1	3,204.9	2,237.1	3,221.6	2,237.1	3,356.2	2,237.1	3,370.4
11	NEXUS	-	105.5	-	105.5	-	105.5	-	105.5	-	105.5	-	105.5
12	Panhandle	-	60.1	-	60.1	-	60.1	-	60.1	-	60.1	-	60.1
13	TCPL Long-Haul	5.0	3.0	5.0	3.0	5.0	3.0	5.0	3.0	5.0	3.0	5.0	3.0
14	TCPL Short-Haul	787.2	21.1	787.2	21.1	787.2	21.1	787.2	21.1	787.2	21.1	787.2	21.1
15	TCPL STS	283.9	-	283.9	-	283.9	-	283.9	-	283.9	-	283.9	-
16	Vector	-	105.5	-	105.5	-	105.5	-	105.5	-	105.5	-	105.5
17	Total Supply	3,325.4	3,433.2	3,313.2	3,505.8	3,313.2	3,521.2	3,313.2	3,538.0	3,313.2	3,672.5	3,313.2	3,686.8
18	Supply Excess / (Shortfall)	(252.9)	-	(280.9)	-	(309.0)	-	(310.8)	-	(309.4)	-	(305.9)	-

Note:
(1) Any Enbridge CDA Dawn storage withdrawal amounts are transported on the Dawn Parkway System and included in the amount shown on line 5.
Any Union South Dawn Parkway System capacity is included in the amount shown as Dawn storage withdrawal on line 10.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Three Fires Group Inc. (Three Fires) / Minogi Corp. (Minogi)

Interrogatory

Issue:

5

Reference:

EB-2024-0067, OEB Staff Report, pp. 40-41

Preamble:

OEB staff noted that having an adjudicative process to review EGI's next five-year GSP would allow the OEB to consider whether any specific First Nations concerns need to be addressed in subsequent annual updates.

Question(s):

a) Please summarize all First Nations concerns EGI was aware of while developing the GSP and in relation to its previous gas supply plan, including any concerns raised by the Indigenous Participants of the Indigenous Working Group.

b) Would EGI consider including in each Annual Update a dedicated "First Nations Considerations" section that, for example: (i) lists adjudicative directions related to First Nations, and (ii) states EGI's response/status? If no, please discuss why not.

Response:

a) Please see response at Exhibit I.1-GFN-1, part c).

b) No. Enbridge Gas does not support including a dedicated "First Nations Considerations" section in each Annual Update. The gas supply plan is developed to ensure the gas supply requirements of all customers are met, including First Nations customers. If there is a specific Indigenous matter recognized by the OEB through this adjudicative process, Enbridge Gas will address the matter in the most appropriate means through the Annual Update filing.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

Please confirm that Enbridge is using a rolling five-year gas supply plan that is updated annually. If not, please explain.

Response:

Confirmed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

Other than the OEB process to review Enbridge's gas supply plan, please provide details on any other third party review Enbridge uses to develop and/or review the (draft or final) gas supply plan.

Response:

Enbridge Gas does not engage a third-party to develop and/or review the annual gas supply plan. However, Enbridge Gas does engage expert consultants to provide expertise on certain areas of the gas supply plan, as needed. For example, ICF Resources LLC was engaged to support the storage requirement included in the gas supply plan as part of Phase 1[1] and Phase 2[2] of Enbridge Gas's 2024 Rebasing proceeding.

[1] EB-2022-0200.
[2] EB-2024-0111.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

a) Based on current information, what percent of a typical residential natural gas bill does gas supply costs represent?

b) Based on the total annual natural gas bill costs for all customers, what portion of those costs relate to gas supply costs.

Response:

a) Please see Attachment 1 for the bill component breakdown for typical residential customers and gas supply costs as a percentage of total bill for sales service customers.

b) Please see Attachment 2 for the bill component breakdown for all other typical customer profiles under in-franchise rate classes and the gas supply costs as a percentage of total bill for sales service. Semi-bundled and unbundled services also include an assumption for commodity to be representative of the customers total cost of natural gas service.

Enbridge Gas Inc.

Typical Residential Customer Bill Breakdown

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate 1	Annual Volume 2,400m^3	
1	Monthly Customer Charge	321	30%
2	Delivery Charges	290	27%
3	Gas Supply Transportation	139	13%
4	Gas Supply Commodity	313	29%
5	Total Bill - Sales Service	1,063	100%
	Rate 01 - Union North West (3)	Annual Volume 2,200m^3	
6	Monthly Customer Charge	335	33%
7	Delivery Charges	251	25%
8	Gas Supply Transportation	120	12%
9	Gas Supply Commodity	296	30%
10	Total Bill - Sales Service	1,002	100%
	Rate 01 - Union North East	Annual Volume 2,200m^3	
11	Monthly Customer Charge	335	28%
12	Delivery Charges	251	21%
13	Gas Supply Transportation	170	14%
14	Gas Supply Commodity	421	36%
15	Total Bill - Sales Service	1,177	100%
	Rate M1	Annual Volume 2,200m^3	
16	Monthly Customer Charge	335	37%
17	Delivery Charges	162	18%
19	Gas Supply Charges	414	45%
20	Total Bill - Sales Service	911	100%

Notes:

(1) EB-2025-0165, Exhibit F, Tab 1, Schedule 1, Appendix D, column (c).

(2) Column (b) calculated by column (a) / Total Bill - Sales Service.

(3) EB-2025-0165, Exhibit A, Tab 3, Schedule 1, p. 2, excluding cost adjustments and rate adjustments.

Enbridge Gas Inc.

Typical Customer Bill Breakdown

EGD Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate 1 - Large Customer	Annual Volume 5,048m^3	
1	Monthly Customer Charge	321	17.2%
2	Delivery Charges	596	31.9%
3	Gas Supply Transportation	293	15.7%
4	Gas Supply Commodity	658	35.2%
5	Total Bill - Sales Service	1,868	100.0%
	Rate 6 - Small Customer	Annual Volume 5,048m^3	
6	Monthly Customer Charge	990	38.1%
7	Delivery Charges	654	25.2%
8	Gas Supply Transportation	293	11.3%
9	Gas Supply Commodity	659	25.4%
10	Total Bill - Sales Service	2,596	100.0%
	Rate 6 - Average Customer	Annual Volume 22,606m^3	
11	Monthly Customer Charge	990	13.0%
12	Delivery Charges	2,387	31.2%
13	Gas Supply Transportation	1,313	17.2%
14	Gas Supply Commodity	2,953	38.6%
15	Total Bill - Sales Service	7,642	100.0%
	Rate 6 - Large Customer	Annual Volume 339,124m^3	
16	Monthly Customer Charge	990	1.1%
17	Delivery Charges	26,341	28.8%
18	Gas Supply Transportation	19,693	21.6%
19	Gas Supply Commodity	44,292	48.5%
20	Total Bill - Sales Service	91,317	100.0%
	Rate 100 - Small Customer	Annual Volume 339,188m^3	
21	Monthly Customer Charge	1,717	1.9%
22	Delivery Charges	25,020	27.6%
23	Gas Supply Transportation	19,697	21.7%
24	Gas Supply Commodity	44,301	48.8%
25	Total Bill - Sales Service	90,735	100.0%
	Rate 100 - Average Customer	Annual Volume 598,567m^3	
26	Monthly Customer Charge	1,717	0.8%
27	Delivery Charges	93,516	44.9%
28	Gas Supply Transportation	34,759	16.7%
29	Gas Supply Commodity	78,178	37.6%
30	Total Bill - Sales Service	208,170	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

EGD Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate 100 - Large Customer	Annual Volume 1,500,000m^3	
31	Monthly Customer Charge	1,717	0.4%
32	Delivery Charges	195,799	40.7%
33	Gas Supply Transportation	87,107	18.1%
34	Gas Supply Commodity	195,912	40.8%
35	Total Bill - Sales Service	480,534	100.0%
	Rate 110 - Small Customer	Annual Volume 598,568m^3	
36	Monthly Customer Charge	8,220	5.9%
37	Delivery Charges	19,722	14.0%
38	Gas Supply Transportation	34,759	24.7%
39	Gas Supply Commodity	77,787	55.4%
40	Total Bill - Sales Service	140,488	100.0%
	Rate 110 - Average Customer	Annual Volume 9,976,120m^3	
41	Monthly Customer Charge	8,220	0.4%
42	Delivery Charges	267,075	12.4%
43	Gas Supply Transportation	579,323	26.9%
44	Gas Supply Commodity	1,296,447	60.3%
45	Total Bill - Sales Service	2,151,065	100.0%
	Rate 110 - Large Customer	Annual Volume 9,976,121m^3	
46	Monthly Customer Charge	8,220	0.4%
47	Delivery Charges	324,111	14.7%
48	Gas Supply Transportation	579,323	26.2%
49	Gas Supply Commodity	1,296,447	58.7%
50	Total Bill - Sales Service	2,208,101	100.0%
	Rate 115 - Small Customer	Annual Volume 4,471,609m^3	
51	Monthly Customer Charge	8,712	0.9%
52	Delivery Charges	87,891	9.4%
53	Gas Supply Transportation	259,671	27.7%
54	Gas Supply Commodity	581,108	62.0%
55	Total Bill - Sales Service	937,382	100.0%
	Rate 115 - Large Customer	Annual Volume 69,832,850m^3	
56	Monthly Customer Charge (2)	8,712	0.1%
57	Delivery Charges (3)	1,306,382	9.0%
58	Gas Supply Transportation	4,055,263	28.1%
59	Gas Supply Commodity	9,075,128	62.8%
60	Total Bill - Sales Service	14,445,486	100.0%
	Rate 125 - Average Customer	Annual Volume 206,000,000m^3	
61	Monthly Customer Charge	6,999	0.0%
62	Delivery Charges	3,431,720	11.4%
63	Gas Supply Commodity	26,770,730	88.6%
64	Total Bill - Sales Service	30,209,449	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

EGD Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate 135 - Average Customer	Annual Volume 598,567m^3	
65	Monthly Customer Charge	1,620	1.2%
66	Delivery Charges	21,135	16.2%
67	Gas Supply Transportation	29,708	22.8%
68	Gas Supply Commodity	77,811	59.7%
69	Total Bill - Sales Service	130,275	100.0%
	Rate 145 - Small Customer	Annual Volume 339,188m^3	
70	Monthly Customer Charge	1,735	2.2%
71	Delivery Charges	14,588	18.6%
72	Gas Supply Transportation	17,838	22.8%
73	Gas Supply Commodity	44,093	56.3%
74	Total Bill - Sales Service	78,255	100.0%
	Rate 145 - Large Customer	Annual Volume 598,567m^3	
75	Monthly Customer Charge	1,735	1.3%
76	Delivery Charges	24,623	18.2%
77	Gas Supply Transportation	31,480	23.2%
78	Gas Supply Commodity	77,811	57.4%
79	Total Bill - Sales Service	135,649	100.0%
	Rate 170 - Small Customer	Annual Volume 9,976,120m^3	
80	Monthly Customer Charge	3,915	0.2%
81	Delivery Charges	111,201	5.9%
82	Gas Supply Transportation	459,063	24.5%
83	Gas Supply Commodity	1,296,447	69.3%
84	Total Bill - Sales Service	1,870,626	100.0%
	Rate 170 - Average Customer	Annual Volume 9,976,121m^3	
85	Monthly Customer Charge	3,915	0.2%
86	Delivery Charges	122,616	6.5%
87	Gas Supply Transportation	459,063	24.4%
88	Gas Supply Commodity	1,296,447	68.9%
89	Total Bill - Sales Service	1,882,041	100.0%
	Rate 170 - Large Customer	Annual Volume 69,832,850m^3	
90	Monthly Customer Charge	3,915	0.0%
91	Delivery Charges	778,533	6.0%
92	Gas Supply Transportation	3,213,443	24.6%
93	Gas Supply Commodity	9,075,128	69.4%
94	Total Bill - Sales Service	13,071,019	100.0%
	Rate 200 - Average Customer	Annual Volume 140,305,600m^3	
95	Monthly Customer Charge	24,000	0.1%
96	Delivery Charges	7,328,128	21.9%
97	Gas Supply Transportation	7,887,174	23.6%
98	Gas Supply Commodity	18,233,134	54.5%
99	Total Bill - Sales Service	33,472,436	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

Union North Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (3) (a)	Total Bill (%) (2) (b)
	Rate 01 - Large Customer	Annual Volume 40,000m^3	
100	Monthly Customer Charge	335	2.2%
101	Delivery Charges	4,137	27.2%
102	Gas Supply Transportation	3,098	20.4%
103	Gas Supply Commodity	7,646	50.2%
104	Total Bill - Sales Service	15,217	100.0%
	Rate 10 - Small Customer	Annual Volume 60,000m^3	
105	Monthly Customer Charge	990	4.5%
106	Delivery Charges	5,843	26.4%
107	Gas Supply Transportation	3,805	17.2%
108	Gas Supply Commodity	11,469	51.9%
109	Total Bill - Sales Service	22,107	100.0%
	Rate 10 - Average Customer	Annual Volume 93,000m^3	
110	Monthly Customer Charge	990	3.0%
111	Delivery Charges	8,774	26.2%
112	Gas Supply Transportation	5,897	17.6%
113	Gas Supply Commodity	17,777	53.2%
114	Total Bill - Sales Service	33,439	100.0%
	Rate 10 - Large Customer	Annual Volume 250,000m^3	
115	Monthly Customer Charge	990	1.1%
116	Delivery Charges	21,756	25.2%
117	Gas Supply Transportation	15,853	18.4%
118	Gas Supply Commodity	47,789	55.3%
119	Total Bill - Sales Service	86,388	100.0%
	Rate 20 - Small Customer	Annual Volume 3,000,000m^3	
120	Monthly Customer Charge	13,945	1.9%
121	Delivery Charges	85,990	11.9%
122	Gas Supply Transportation	67,972	9.4%
123	Gas Supply Commodity	557,046	76.8%
124	Total Bill - Sales Service	724,953	100.0%
	Rate 20 - Large Customer	Annual Volume 15,000,000m^3	
125	Monthly Customer Charge	13,945	0.4%
126	Delivery Charges	374,768	10.8%
127	Gas Supply Transportation	291,309	8.4%
128	Gas Supply Commodity	2,785,230	80.4%
129	Total Bill - Sales Service	3,465,253	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

Union North Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (3) (a)	Total Bill (%) (2) (b)
	Rate 25 - Average Customer	Annual Volume 2,275,000m^3	
130	Monthly Customer Charge	4,708	0.9%
131	Delivery Charges	82,310	15.6%
132	Gas Supply Transportation	17,167	3.3%
133	Gas Supply Commodity	422,427	80.2%
134	Total Bill - Sales Service	526,611	100.0%
	Rate 100 - Small Customer	Annual Volume 27,000,000m^3	
135	Monthly Customer Charge	20,717	0.3%
136	Delivery Charges	343,412	5.3%
137	Gas Supply Transportation	1,083,615	16.8%
138	Gas Supply Commodity	5,013,414	77.6%
139	Total Bill - Sales Service	6,461,157	100.0%
	Rate 100 - Large Customer	Annual Volume 240,000,000m^3	
140	Monthly Customer Charge	20,717	0.0%
141	Delivery Charges	2,952,569	5.2%
142	Gas Supply Transportation	9,210,723	16.2%
143	Gas Supply Commodity	44,563,680	78.5%
144	Total Bill - Sales Service	56,747,689	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

Union South Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate M1 - Large Customer	Annual Volume 40,000m^3	
145	Monthly Customer Charge	335	3.2%
146	Delivery Charges	2,663	25.3%
147	Gas Supply Charges	7,526	71.5%
148	Total Bill - Sales Service	10,524	100.0%
	Rate M2 - Small Customer	Annual Volume 60,000m^3	
149	Monthly Customer Charge	990	5.8%
150	Delivery Charges	4,700	27.7%
151	Gas Supply Charges	11,289	66.5%
152	Total Bill - Sales Service	16,980	100.0%
	Rate M2 - Average Customer	Annual Volume 73,000m^3	
153	Monthly Customer Charge	990	4.9%
154	Delivery Charges	5,691	27.9%
155	Gas Supply Charges	13,735	67.3%
156	Total Bill - Sales Service	20,416	100.0%
	Rate M2 - Large Customer	Annual Volume 250,000m^3	
157	Monthly Customer Charge	990	1.5%
158	Delivery Charges	18,559	27.9%
159	Gas Supply Charges	47,037	70.6%
160	Total Bill - Sales Service	66,587	100.0%
	Rate M4 - Small Customer	Annual Volume 875,000m^3	
161	Delivery Charges	62,700	27.6%
162	Gas Supply Charges	164,630	72.4%
163	Total Bill - Sales Service	227,329	100.0%
	Rate M4 - Large Customer	Annual Volume 12,000,000m^3	
164	Delivery Charges	504,930	18.3%
165	Gas Supply Charges	2,257,776	81.7%
166	Total Bill - Sales Service	2,762,706	100.0%
	Rate M5 - Small Customer	Annual Volume 825,000m^3	
167	Monthly Customer Charge	9,668	4.8%
168	Delivery Charges	38,028	18.7%
169	Gas Supply Charges	155,222	76.5%
170	Total Bill - Sales Service	202,918	100.0%
	Rate M5 - Large Customer	Annual Volume 6,500,000m^3	
171	Monthly Customer Charge	9,668	0.6%
172	Delivery Charges	283,621	18.7%
173	Gas Supply Charges	1,222,962	80.7%
174	Total Bill - Sales Service	1,516,251	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

Union South Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate M7 - Small Customer	Annual Volume 36,000,000m^3	
175	Delivery Charges	924,625	12.0%
176	Gas Supply Charges	6,773,328	88.0%
177	Total Bill - Sales Service	7,697,953	100.0%
	Rate M7 - Large Customer	Annual Volume 52,000,000m^3	
178	Delivery Charges	3,570,435	26.7%
179	Gas Supply Charges	9,783,696	73.3%
180	Total Bill - Sales Service	13,354,131	100.0%
	Rate M9 - Small Customer	Annual Volume 6,950,000m^3	
181	Delivery Charges	222,517	14.5%
182	Gas Supply Charges	1,307,629	85.5%
183	Total Bill - Sales Service	1,530,146	100.0%
	Rate M9 - Large Customer	Annual Volume 20,178,000m^3	
184	Delivery Charges	660,992	14.8%
185	Gas Supply Charges	3,796,450	85.2%
186	Total Bill - Sales Service	4,457,442	100.0%
	Rate T1 - Small Customer	Annual Volume 7,537,000m^3	
187	Monthly Customer Charge	27,548	1.7%
188	Delivery Charges	155,934	9.7%
189	Gas Supply Charges	1,418,071	88.5%
190	Total Bill - Sales Service	1,601,554	100.0%
	Rate T1 - Average Customer	Annual Volume 11,565,938m^3	
191	Monthly Customer Charge	27,548	1.1%
192	Delivery Charges	258,358	10.5%
193	Gas Supply Charges	2,176,108	88.4%
194	Total Bill - Sales Service	2,462,014	100.0%
	Rate T1 - Large Customer	Annual Volume 25,624,080m^3	
195	Monthly Customer Charge	27,548	0.5%
196	Delivery Charges	618,662	11.3%
197	Gas Supply Charges	4,821,119	88.2%
198	Total Bill - Sales Service	5,467,329	100.0%
	Rate T2 - Small Customer	Annual Volume 59,256,000m^3	
199	Monthly Customer Charge	86,924	0.7%
200	Delivery Charges	737,538	6.2%
201	Gas Supply Charges	11,148,898	93.1%
202	Total Bill - Sales Service	11,973,360	100.0%

Enbridge Gas Inc.

Typical Customer Bill Breakdown

Union South Rate Zone

Line No.	Particulars	EB-2025-0165 Approved July 1, 2025 Total Bill ($) (1) (a)	Total Bill (%) (2) (b)
	Rate T2 - Average Customer	Annual Volume 197,789,850m^3	
203	Monthly Customer Charge	86,924	0.2%
204	Delivery Charges	1,936,029	4.9%
205	Gas Supply Charges	37,213,765	94.8%
206	Total Bill - Sales Service	39,236,718	100.0%
	Rate T2 - Large Customer	Annual Volume 370,089,000m^3	
207	Monthly Customer Charge	86,924	0.1%
208	Delivery Charges	3,274,759	4.5%
209	Gas Supply Charges	69,631,505	95.4%
210	Total Bill - Sales Service	72,993,188	100.0%
	Rate T3 - Large Customer	Annual Volume 272,712,000m^3	
211	Monthly Customer Charge	290,018	0.5%
212	Delivery Charges	6,695,133	11.5%
213	Gas Supply Charges	51,310,217	88.0%
214	Total Bill - Sales Service	58,295,368	100.0%

Notes:

(1) EB-2025-0165, Exhibit F, Tab 1, Schedule 1, Appendix D, column (c).

(2) Column (b) calculated by column (a) / Total Sales Service.

(3) Gas Supply Charges based on Union North East Zone.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

Ontario's Energy for Generations plan (Energy for Generations | ontario.ca)

The above-noted major policy document was released by the Province of Ontario following Enbridge's filing of its five-year gas supply plan. Enbridge previously confirmed that it was coordinating with the Province on the natural gas elements.

Question(s):

a) Please detail Enbridge's involvement in the development (directly or through consultation) of this new policy document and please provide copies of all materials (submissions, presentations, emails, etc.) from Enbridge.

b) What policy issues in the Energy for Generations plan are incremental to what Enbridge considered in development of its five-year gas supply plan?

c) Please explain how Enbridge intends to integrate the new policy directions for purposes of its gas supply plan.

d) Please indicate what the increased focus on RNG and hydrogen could mean to the Enbridge gas supply plan.

e) What additional performance metrics may be required to assess Enbridge progress against any of the policy elements in the Energy for Generations plan?

Response:

a) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding. It is not related to Issue 6 (as noted in the preamble to the question) nor to any of the issues in the Issues List.

b-e) Please see response at Exhibit I.2-STAFF-11.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

June 11, 2025 Directive to the OEB (OC-802-2025.pdf)

The above-noted Directive was issued to the OEB following Enbridge's filing of its five-year gas supply plan. Items in the directive occur over the next year and/or within the timeframe of the gas supply plan.

Question(s):

a) What policy or operational issues outlined in the Directive are incremental to what Enbridge considered in development of its five-year gas supply plans?

b) The Directive to the OEB requires Enbridge to include additional gas supply scenarios. Please explain what additional gas supply scenarios Enbridge has done and/or plans to do in alignment with this new requirement.

c) Please explain Enbridge's understanding of the purpose and Enbridge's responsibilities/role for the new integrated energy planning approach which may impact natural gas planning for the future.

Response:

a-c) Please see response at Exhibit I.2-STAFF-11.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

The Ontario Ministry of Energy and Electrification's Cost Effective Energy Pathways Study for Ontario (Cost Effective Energy Pathways Study for Ontario) was recently released following Enbridge's five-year gas supply plan filing.

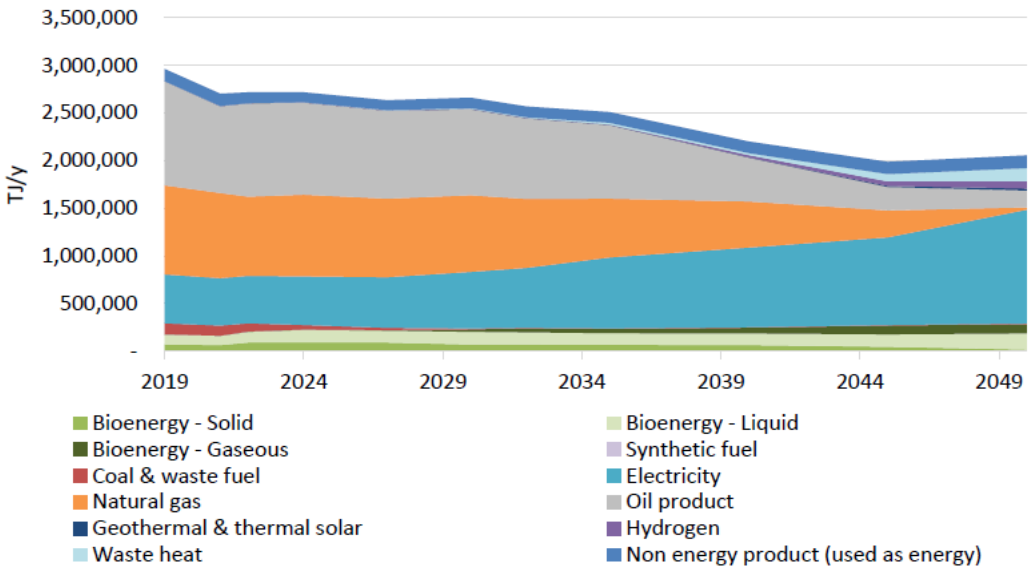


Figure ES-1. Final energy consumption (TJ/y) by fuel type from 2019 to 2050 for the NZ50 IP

Question(s):

a) What policy or operational issues outlined in the Provincial Pathways Study are incremental to what Enbridge considered in development of its five-year gas supply plan?

b) Did Enbridge use the Ontario pathway to emissions reductions in Figure ES-1, for any scenarios in its five-year gas supply plan? If yes, please provide the details. If no, please provide the impacts to the gas supply plan using this scenario?

c) Hydrogen and RNG are minor contributions in Figure ES-1. Does ENGLP agree with that assessment? If not, please explain why not.

Response:

a-c) The noted "Cost Effective Energy Pathways Study for Ontario" was completed in August 2024 but not released until June 2025, after the 5-Year Gas Supply Plan was prepared and filed. Accordingly, the study did not inform the 5-Year Gas Supply Plan.

Enbridge Gas submits that the request to re-run gas supply scenarios based on the noted study is beyond the scope of this proceeding (which relates to the forecast period of 2024/25 to 2029/30) and is not relevant to any of the issues in the Issues List.

For details regarding actual historic volumes of hydrogen and RNG procured by Enbridge Gas relative to the total gas supply volumes purchased annually (2021/22 to 2023/24 gas years) please see response at Exhibit I.6-PP-17. The Integrated Energy Plan notes that hydrogen and/or RNG may play larger roles in the future.[1]

[1] See Integrated Energy Plan (Energy for Generations), at pp.26, 100, 101 and 111.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

Ontario's Energy for Generations plan (Energy for Generations | ontario.ca)

June 11, 2025 Directive to the OEB (OC-802-2025.pdf)

Directive to IESO (https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Directive-from-the-Minister-of-Energy-and-Mines-20250612-IEP.pdf)

Question(s):

The above-noted Provincial Energy for Generations plan and related directives has a limited focus on natural gas as compared to electrification and decarbonization of the grid in support of the Energy Transition. This could be interpreted that natural gas is currently an important and material part of Ontario's energy mix, but not a long-term future priority. Please provide Enbridge interpretation, particularly given the limited references to natural gas in these most recent policy documents.

Response:

Notwithstanding that the interrogatory is out of scope for this proceeding, Enbridge Gas is of the view that it is important to respond to Pollution Probe's mischaracterization of the role of natural gas as set out in the Ontario government's June 2025 *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* (IEP) currently and in the future.

Contrary to Pollution Probe's assertion that the IEP and related directives have a limited focus on natural gas as compared to electrification and decarbonization, the IEP contains numerous references to natural gas and the importance it plays now and the "decades to come" throughout. There is nothing in the IEP that would suggest that natural gas is not a priority in the future. In fact, there is an entire chapter dedicated to

the role of natural gas. The IEP provides the following important messages on the role of natural gas in Ontario:

"There are more than 3.8 million natural gas customers in Ontario, with the fuel accounting for roughly 40 per cent of the province's total energy use." [p. 95]

"Customer choice – a hallmark of the province's energy system – has resulted in many industrial, commercial, institutional, agricultural and residential customers choosing natural gas as the fuel that delivers affordable energy that best meets their needs." [p. 95]

"The province's natural gas and electricity systems effectively combine to affordably, securely and reliably meet a large part of the province's collective energy needs and peak demand. For example, peak demand for natural gas as a heating fuel can be significantly greater than the electricity system, up to 121 gigawatts (GW) for natural gas compared to 24 GW for electricity." [p. 95]

"Because natural gas provides a powerful combination of low cost and high energy density that cannot currently be matched by other energy sources, it is a critical component of Ontario's future energy mix." [p. 95]

"Natural gas remains a vital component of Ontario's energy mix, supporting economic activity and energy reliability across the province. It meets diverse energy needs across the industrial, residential, commercial, institutional and agricultural sectors of the economy. At the same time, natural gas plays a critical role in Ontario's electricity system. As a flexible and dispatchable resource, natural gas generation accounts for about 28 per cent of the electricity system's transmission-connected capacity and ensures the system needs can meet demand when it's needed the most – especially on hot summer days and cold winter nights when reliability is paramount." [p. 95]

"An economically viable natural gas network will attract industrial investment, drive economic growth, maintain customer choice and ensure overall energy system resiliency, reliability and affordability." [p. 95]

"The OEB will continue to play a key role as the natural gas system's economic regulator to protect the interests of consumers with respect to prices and the reliability and quality of gas service, while ensuring that utilities have the opportunity to earn a fair return and facilitate the rational expansion of the natural gas transmission and distribution system." [p. 95]

"Natural gas is a critical energy source for Ontario. It provides almost 40 per cent of Ontario's total energy use across the industrial, residential, commercial and agricultural sectors of the economy." [p. 96]

"In Ontario's vital industrial and agricultural sectors, there are currently few alternatives to natural gas for certain processes…"[p. 96]

"The majority of Ontario's homes use natural gas for heat, while homeowners in rural and northern areas who do not have access to natural gas, want the option to have it through expansion of the natural gas network." [p. 96]

"There is a need for an economically viable natural gas network – as the province builds a more diverse energy system – to attract industrial investment, to drive economic growth, to maintain customer choice and ensure overall energy system resiliency, reliability and affordability." [p. 96]

"The OEB will continue to play its role as the natural gas system's economic regulator, protecting consumers, allowing gas utilities an opportunity to earn a fair return on investment, and enabling the continued rational expansion of the natural gas system." [p. 96]

"As part of a gradual transition to a more diverse energy system, Ontario will continue to support the important role of natural gas in Ontario's energy system and economy while pursuing options to lower costs and reduce emissions through energy efficiency, electrification, clean fuels (e.g., renewable natural gas, low-carbon hydrogen) and carbon capture and storage." [p. 96]

"Natural gas generation will continue to play a critical role in Ontario's grid, balancing intermittent renewable power generation, such as wind and solar, supported by new energy storage technologies that are deployed at scale and other clean sources."[p. 97]

"A premature phase-out of natural gas electricity generation would hurt electricity consumers and the economy. It could also put the reliability of the system at risk."[p. 97]

"Natural gas is required to provide the IESO with greater flexibility to manage peak electricity demand. It is an insurance policy to maintain system reliability and support electrification across the economy." [p. 97]

In terms of the directive to the IESO, Pollution Probe should not be surprised the directive is focused on electricity and electrification given that the directive is to the IESO: the Independent Electricity System Operator. Further, the directive cannot be read in isolation of the reasoning behind issuing the directive provided on page 4 of the directive. The government states:

"The Ontario government is focused on ensuring the province has the energy it needs to power a more competitive, self-reliant and resilient economy - energy that is affordable, secure, reliable and clean.

Over the next 25 years, Ontario's electricity demand is expected to increase by 75 per cent or more - driven by strong economic growth, the electrification of transportation and industry and a population forecasted to increase to nearly 21 million people. At the same time, ***demand for other energy sources - including natural gas - remains strong****, while emerging fuels like hydrogen and renewable natural gas will play a growing role as the province builds a more diverse energy system.*

To stay competitive in a rapidly changing global economy, Ontario must ensure its ***entire energy system*** *is focused on meeting growing demand -* ***across all energy sources and sectors****. This means building out infrastructure, attracting investment and streamlining regulatory approvals. It will also require the end of siloed planning - Ontario's energy system must plan and operate as one."*
[emphasis added. p.4]

It is clear from the paragraphs above that although electricity demand will grow substantially over the next 25 years, natural gas demand will remain strong. Further, the paragraphs above reinforce the government's commitment to an "all-of-the-above approach" in reference to "all energy sources and all sectors".

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

a) Please confirm that the Enbridge gas supply function manages both the regulated and unregulated gas supply functions for Enbridge. If not, please explain how each are done and coordinated.

b) Please explain how the unregulated gas supply activities managed by the Enbridge gas supply function are allocated in alignment with the affiliate relationship code.

c) Is all gas supply planning (regulated and unregulated) conducted in a coordinated manner by the Enbridge gas supply function? If no, please explain which departments coordinate what pieces. If yes, please provide the full (regulated and unregulated) gas supply plan and/or strategy documents.

d) Please explain the process and timing used to separate the gas supply plan into regulated and unregulated components.

Response:

a–d)
Not confirmed. The gas supply function is a utility function, managing utility customer gas supply needs for regulated sales service, bundled direct purchase (DP) and semi-unbundled DP customer gas supply requirements.

Enbridge Gas makes accounting adjustments to allocate fuel costs to its unregulated operations (in accordance with the 2024 Rebasing Phase 2 Settlement Agreement[1]) and to allocate the cost of transactions for supply made on behalf of unregulated affiliate companies.

[1] EB-2024-0111, Settlement Agreement, November 29, 2024.

Adjustment for Unregulated Fuel Allocation

Enbridge Gas makes an accounting adjustment to reflect unregulated use of company use gas, unaccounted for gas and compressor fuel. As approved in Phase 2 of the 2024 Rebasing Application[2], these costs are allocated on a monthly basis to the unregulated business based on the portion of unregulated storage activity as a percentage of total storage and transportation activity.

Adjustment for Affiliate Transactions

Enbridge Gas's gas supply function makes a few minor transactions on behalf of unregulated affiliate companies. The transactions relate to purchasing fuel on behalf of the affiliate that is used in the affiliate company's operations (usually twice per year).

Enbridge Gas makes an accounting adjustment to recover the cost of the fuel and Enbridge Gas staff time used to complete the transaction. The cost of Enbridge Gas staff time is determined based on timesheet submissions using the Fully Allocated Rate (FAC) per the Affiliate Relationship Code.

[2] EB-2024-0111, Phase 2 Exhibit 1, Tab 13, Schedule 2.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

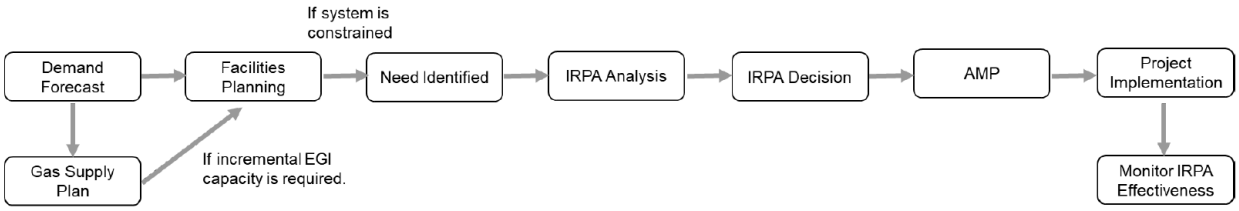
Interrogatory

Issue:

6

Reference:

EB-2020-0091 Exhibit I.Staff.2



Question(s):

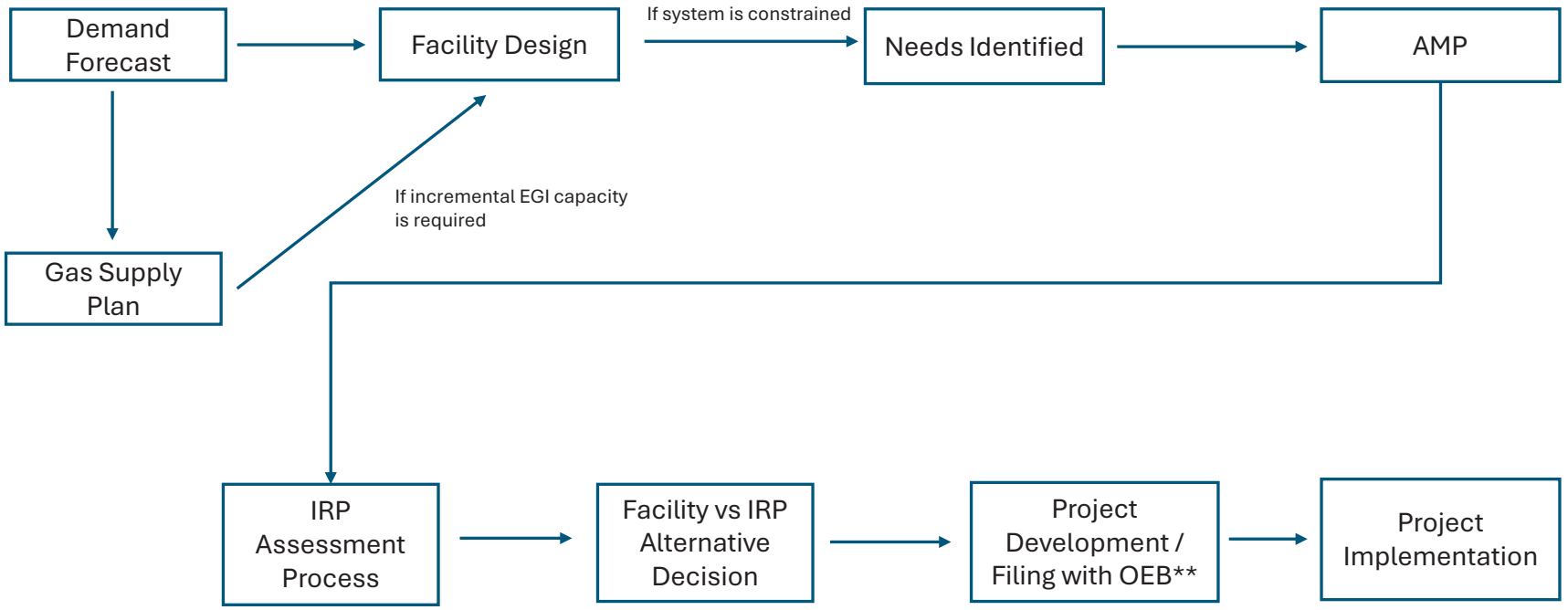
Please confirm that this diagram is still the most recent version showing the linkage between gas supply / demand forecast and the assessment of integrated resource plan (IRP) alternatives. If there is a more recent version that differs, please provide a copy.

Response:

Not confirmed. Please see Attachment 1 for the updated illustrative diagram showing the linkage between gas supply planning and the integrated resource planning process. The illustrative diagram was updated subsequent to the OEB's Decision in the Integrated Resource Planning Proposal proceeding[1] and does not represent an official internal process document.

[1] EB-2020-0091, OEB Decision and Order, July 22, 2021.

Diagram 1
Linkage between Gas Supply Planning and Integrated Resource Planning*



* This diagram does not represent an official internal process; rather, it serves as a visual representation of the linkage between gas supply planning and the integrated resource planning process.

** LTC/IRP Plan filing with the OEB is only applicable for investments that meet the filing criteria. (i.e. IRP Plan required for investments > $2M)

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

a) Please confirm that integrated energy planning is a policy objective supported by the Province and OEB. If not, please explain.

b) Please explain how Enbridge has attempted to address integrated energy planning in the five-year gas supply plan.

c) Please explain how Enbridge has provided or considered supply-side integrated resource planning (IRP) options as part of its gas supply planning function.

d) Please provide the full menu of supply-side integrated resource planning (IRP) options Enbridge has available to apply to gas demand needs, as appropriate.

Response:

a) Confirmed.

b) Please see response at Exhibit I.2-STAFF-11.

c) For supply-side alternatives to be classified as an IRP alternative, it requires a specific facility project to be eliminated, reduced or deferred from the Asset Management Plan (AMP) through the IRP assessment process. Please see response at Exhibit I.2-STAFF-12 for discussion of the differentiation between gas supply planning and IRP processes as they relate to avoided, deferred, or reduced facilities.

d) As discussed in part c), and in response to Exhibit I.2-STAFF-12, the IRP assessment process occurs after a project is identified in the Asset Management Plan. IRP supply-side alternatives considered in this process are listed in the IRP 2024 Annual Report.[1]

[1] EB-2025-0064, Exhibit I.1.13-ED-4 Attachment 1, IRP Annual Report, pp.41-42

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

To date, Enbridge Gas has supported the energy transition through the purchase of RNG, the inclusion of certified gas in the gas supply portfolio and the purchase of hydrogen through the Low Carbon Energy Project. [Page 69]

Question(s):

For the proposed five-year gas supply plan and the preceding five-year plan, please provide a table showing the total amount of the following and include a column to show the percentage each represents of the total annual gas supply for each year.

- Total gas supply
- RNG
- Certified gas
- Hydrogen

Response:

Enbridge Gas does not forecast volumes of RNG, certified gas, or hydrogen as part of its annual gas supply plan. Table 1 contains three years (November 2021 to October 2024)[1] of historical volumes of RNG, certified gas and hydrogen purchased as a percentage of the total annual gas supply for each gas year.

[1] Enbridge Gas did not begin procuring volumes of RNG, certified gas, and hydrogen until the 2021/22 gas year.

Table 1
Purchases of RNG, Certified Gas, and Hydrogen

Line No.	Particulars	2021/22		2022/23		2023/24	
		GJ	%	GJ	%	GJ	%
		(a)	(b)	(c)	(d)	(e)	(f)
1	RNG	1,000	0.0190%	2,380	0.0005%	2,300	0.0005%
2	Certified Gas	2,294,747	0.4387%	28,934,763	5.7725%	20,816,849	4.5446%
3	Hydrogen	891	0.0002%	1,661	0.0003%	1,216	0.0003%
4	Total Gas Supply	523,120,694		501,248,025		458,055,426	

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

As of March 31, 2025, Enbridge Gas has made three purchases of RNG as part of the VRNG program, procuring 5,600 GJ in total, with 2,300 GJ procured in the 2023/24 gas year. [Page 70]

Question(s):

a) Please provide the lifecycle emissions (tonnes CO2e per m3 and/or MJ) for the 2,300 GJs of RNG procured.

b) Does Enbridge plan to continue the VRNG or wind it down due to the low participation rates? If a wind down is planned, please provide the estimated timeline.

Response:

a) The lifecycle carbon intensity for the 2,300 GJ of RNG procured was not provided by the supplier. The end-use emission factor for RNG is 0.01 $kgCO_2e/m^3$ of RNG as derived from the 2024 National Inventory Report[1].

b) At this time Enbridge Gas intends to continue the VRNG program.

[1] Environment and Climate Change Canada. 2024 National Inventory Report 1990-2022: Greenhouse Gas Sources and Sinks in Canada. Part 2. Table A6.1-1 and A6.1-3.
The combustion of RNG results in a small amount of methane and nitrous oxide emissions being produced. The combustion of RNG also produces biogenic carbon dioxide which is not additional to the atmosphere and therefore excluded from the emission factor. En81-4-2022-2-eng.pdf

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

Certified natural gas is conventional natural gas that has been produced to meet a specified set of standards and practices.

Question(s):

a) Please provide the standards and practices that are being used for the certified natural gas Enbridge is purchasing.

b) Please confirm that certified natural gas is not a gas procurement factor leading to additional costs being incurred for certified natural gas compared to regular (non-certified) natural gas. If that is not correct, please explain.

Response:

a) Please see response at Exhibit I.2-ED-10, part b).

b) Confirmed. As stated in the Company's 5-Year Gas Supply Plan[1]:

> Enbridge Gas procures certified natural gas as part of the gas supply commodity portfolio, however, does not pay a premium to include certified natural gas in the gas supply and currently does not have a strategy to actively increase procurement of certified natural gas.

[1] EB-2025-0065, p.71.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

The Hydrogen Blending Grid Study was initiated in 2023 and will be completed in 2026 [Page 72]

Question(s):

a) Which filing year does Enbridge expect to integrate any relevant outcomes from the Hydrogen Blending Grid Study into its annual gas supply plan?

b) Consideration for the appropriateness and treatment of pure hydrogen pipelines to support Ontario's net zero future is underway. Does the scope of the Hydrogen Blending Grid Study include pure hydrogen pipelines or just blending to a specific maximum percentage? If pure hydrogen pipelines are not part of the scope, please provide details on how Enbridge is assessing that scenario.

Response:

a) Enbridge Gas cannot comment on the timeline and level of effort required to integrate any relevant Hydrogen Blending Grid Study outcome into the gas supply plan as the study is still on-going at the time of this filing.

b) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding. The Hydrogen Blending Grid Study scope was discussed in Phase 1 of the 2024 Rebasing Application[1]. It is not part of the 5-Year Gas Supply Plan. There is no issue in this proceeding as part of Issue 6 (as referenced by Pollution Probe) or elsewhere in the Issues List as to the future plans for pure hydrogen pipelines.

[1] EB-2022-0200.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

Enbridge Gas submitted a revised Leave to Construct application for the Low Carbon Energy Project (LCEP) with the OEB on March 31, 2020. Following OEB approval in the fall of 2020, construction started on the associated hydrogen blending facilities. Construction and commissioning were completed in September 2021, and the plant began blending up to 2% hydrogen by volume on October 1, 2021, for approximately 3,600 customers in Markham, Ontario. [Page 71]

Question(s):

a) Please provide a table showing the amount and percent of hydrogen blending per year since project commissioning. If the percentage is below 2%, please explain why.

b) Enbridge estimated that the GHG reductions from the pilot project would be 97-120 tonnes of carbon dioxide equivalent (tCO2e) per year [EB-2019-0294 OEB Decision, page 1]. Please provide the actual annual lifecycle GHG emission reductions since the project was commissioned.

c) The OEB pilot project Decision [EB-2019-0294 OEB Decision, Page 15] requires Enbridge to file a pilot project report. Please provide an update on that report and if it has already been filed, please provide the filing reference.

Response:

a-b) Please see Table 1 outlining the average percent of hydrogen blend on a 12-month annualized basis with a maximum of 2% blend. As seen in column (c) the annual average percent of blended hydrogen is less than two percent due to two reasons: 1) hydrogen supply being periodically unavailable and 2) hydrogen equipment limitation during low natural gas demand periods (such as the summer months). GHG emission reductions have been calculated on an end-use basis as provided in

EB-2025-0065, Appendix E, for emissions abated through procurement of hydrogen. Enbridge Gas has not been provided the lifecycle carbon intensity of the hydrogen. Further, the end-use emission factor for hydrogen does not vary according to type or specific supply and is considered as 0 $kgCO_2e/m^3$ of hydrogen.

Table 1
Hydrogen Blend Percent and Annual GHG Reductions

Line No.	Unit:	Volume of Hydrogen Blended m^3	Volume of Natural Gas m^3	Annual Average Blended Hydrogen Percent %	Annual GHG Reductions tCO_2e
		(a)	(b)	(c) = (a)/(b)*100	(d)
1	2021/22	108,155	10,788,432	1.0	68
2	2022/23	130,001	9,831,857	1.3	82
3	2023/24	95,144	9,180,245	1.0	60
4	2024/25 (Nov 1 to July 31)	37,965	9,611,977	0.4	24

c) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding. There is no issue in this proceeding as part of Issue 6 (as referenced by Pollution Probe) or elsewhere in the Issues List as to the status from the LCEP.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Question(s):

a) Based on Enbridge's five-year gas supply plans filed with the OEB, please describe what flexibility Enbridge retains to vary from the plan as filed and what elements are not open to change over the plan term.

b) Please describe how the input and process for the annual review of the Enbridge five-year gas supply plan has impacted how Enbridge develops and executes the gas supply function.

c) Please describe how gas supply planning (and the gas supply plan) is conducted differently under the merged utility vs. legacy Enbridge Gas and Union Gas. Please include a list of any improvements and cost efficiencies that have been gained through the consolidated approach.

Response:

a) Enbridge Gas's gas supply plan is flexible to adapt to dynamic market and operational conditions during the year through the operation of its flexible commodity, transportation and storage portfolios. Enbridge Gas has responded to this question from the perspective of the contracting flexibility described below.

   Enbridge Gas's commodity purchases are flexible over the period of the 5-Year Gas Supply Plan due to a procurement strategy that incorporates a layered approach including annual, seasonal, monthly, and short-term contracts. As a result, Enbridge Gas is able to adjust commodity purchases in response to actual weather, changes in customer demand patterns, and market price variability throughout the year. Enbridge Gas does not have any commodity contracts that extend beyond the period of the 5-Year Gas Supply Plan.

Enbridge Gas's transportation portfolio contract terms are diversified, with most including renewal rights, enabling Enbridge Gas to adjust its transportation portfolio in response to changes in demand during the period of the 5-Year Gas Supply Plan. Enbridge Gas has some transportation contract expiry terms are beyond the 5-Year Gas Supply Plan period. For a complete list of transportation contracts including expiry term, please see Exhibit I.2-ED-6, Attachment 1.

Enbridge Gas's storage portfolio contract terms are diversified with all expiring within the period of the 5-Year Gas Supply Plan, providing flexibility to adjust if needed. Expiry of storage contracts is provided at Table 9[1] of the pre-filed evidence.

Short-term services like peaking contracts and third-party assignments are employed to manage demand increases without long-term commitments, providing flexibility to adjust requirements year to year as needed.

b) Enbridge Gas assumes this question refers to the OEB's stakeholder conference as outlined in the Framework.

Section 2.2 of the 5-Year Gas Supply Plan includes an outline of significant changes and continuous improvements made to the gas supply plan for the 2025 Annual Update. Enbridge Gas has included similar information in previous gas supply plan annual update filings.

c) Enbridge Gas declines to answer this question as it is not relevant to the Issues List in this proceeding. Questions about efficiencies and improvements from integration were part of Phase 1 of the 2024 Rebasing Application[2].

There is no issue in this proceeding as part of Issue 6 (as referenced by Pollution Probe) or elsewhere in the Issues List as to the differences between gas supply planning from the pre-amalgamation utilities and Enbridge Gas, nor as to any savings or efficiencies realized.

[1] EB-2025-0065, Table 9, p.48.
[2] EB-2022-0200.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

The first step in the annual gas supply planning process is the update to the annual and design day demand forecasts that occurs from April to July each year. Updating the demand forecasts requires an in-depth analysis that focuses on key factors impacting demand including customer growth, normalized weather, design day requirements, customer consumption patterns, and economic outlooks. [Page 10]

Question(s):

a) For each element required to develop the demand forecasts, please indicate the source of the information. If it is an internal Enbridge source, please indicate which department it comes from and the process used.

b) Is the annual and design day forecasts a grass-roots exercise of simply updating elements of the previous forecast.

Response:

a- b) The demand forecasts used to inform the 5-Year Gas Supply Plan are developed by three internal teams within Enbridge Gas. The general service annual demand forecast is prepared by the Demand Forecast and Analysis team, the contract market annual demand forecast is prepared by the Revenue team, and the design day demand forecast is prepared by the Engineering team. The respective methodologies and process used by each team are described below.

General Service Annual Demand Forecast

The methodologies used to develop the general service annual demand forecast are provided in the Company's pre-filed evidence from Phase 1 of the 2024 Rebasing Application[1]. For the elements and sources required to develop the general service annual demand forecast, please see EB-2022-0200, Exhibit I.3.2-EP-40, Attachment 2, pp. 8-11 as well as Exhibit I.3.2-SEC-154, Attachment 1, p. 4.

Contract Market Annual Demand Forecast

As described in Section 4.2 of the submitted 5-Year Gas Supply Plan, the contract market annual demand forecast is developed using a customer specific bottom-up forecast. The forecast is based on a combination of historical consumption, customer specific knowledge of production plans and expectations, and non-customer specific adjustments to reflect the impact of Demand Side Management (DSM) and sector level growth (not underpinned by specifically identified customers). The customer specific knowledge is sourced from the Enbridge Gas account executive/account manager. The adjustment for DSM is consistent with the level of abatement forecast by rate class within the multi-year DSM Plan.

Design Day Demand Forecast

The design day demand forecast process is provided in the Company's pre-filed evidence from Phase 1 of the 2024 Rebasing Application[2]. The design day demand forecast is composed of design day demand of the existing general service and contract rate customers, general service customer growth forecast and contract demands forecast. The design day demand is calculated by the Engineering department as described in paragraph 51 and is calculated from a "grass roots" perspective every year.

[1] EB-2022-0200, Exhibit 3, Tab 2, Schedule 3-7.
[2] EB-2022-0200, Exhibit 4, Tab 2, Schedule 3, paragraph 51.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

Table 3, Page 23.

Question(s):

Please provide a copy of Table 3 with a column to include corresponding peak design day temperatures.

Response:

Please see the updated Table 3.

Table 3
Design Criteria

Line No.	Delivery Area	HDDw (Celsius)	Wind-Compensated Temperature (Celsius)	Weather Station Location
	(a)	(b)	(c)	(d)
1	EGD CDA Niagara	37.8	-22.8	St. Catharines
2	EGD CDA GTA	41.4	-26.4	Toronto
3	EGD EDA	47.5	-32.5	Ottawa
4	Union MDA	51.0	-36.0	Fort Frances / International Falls
5	Union SSMDA	43.4	-28.4	Sault Ste Marie
6	Union WDA	48.4	-33.4	Thunder Bay
7	Union EDA	43.0	-28.0	Kingston
8	Union NCDA	48.5	-33.5	Muskoka
9	Union NDA	47.2	-32.2	Sudbury
10	Union South	40.8	-25.8	London

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

On design day, the interruptible demand is curtailed. [Page 23]

Question(s):

Please provide the total curtailment removed (per delivery area and total for the system) and what that represents as a percentage of the total demand.

Response:

Interruptible demand has not been included in the gas supply plan as it is assumed to be fully curtailed on design day. Please see Table 1 for interruptible demand details.

Table 1
Interruptible Demand for Winter 2024/25

Line No.	Rate zone	Interruptible Demand (TJ/d)	Percentage of System Demand (%) [1]
		(a)	(b)
1	Union North West Delivery Area	6.6	7.2
2	Union North Delivery Area	5.1	2.8
3	Union North Sault St. Marie Delivery Area	1.9	4.3
4	Union North Eastern Delivery Area	9.4	4.7
5	EGD Central Delivery Area	98.1	2.7
6	EGD Eastern Delivery Area	20.8	2.8
7	Union South	252.0	6.8
8	Total	393.9	4.5

[1] Percentage of system demand is calculated with Interruptible Demand from Table 1 column (a) (“IT”) and Design Day Demand from EB-2025-0065, Table 4 (“DDD”) as: [IT/(IT+DDD)]*100.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue:

6

Reference:

These updates to the Plan typically occur from July to August each year and result in an operational version of the Plan for the upcoming winter that receives internal senior management review and approval. [Page 10]

Question(s):

a) Please explain the annual process used for senior management approval.

b) Please provide a copy of the materials used to gain senior management approval for this current five-year gas supply plan.

c) Please confirm that Enbridge still agrees with May 1 as the annual filing date for the gas supply plan. If not, please explain what Enbridge proposes and why.

Response:

a-b) Enbridge Gas's gas supply team presents the gas supply plan overview, inputs, outcomes, and recommendations following its completion to senior management for approval in a meeting scheduled in September each year. The 2024/25 Gas Supply Plan presentation to senior management is included at Attachment 1. Following senior management review and approval, the gas supply plan is distributed to internal operational teams in advance of November 1, the start of the gas year.

c) Please see response at Exhibit I.7-STAFF-1.

2024/25 Gas Supply Plan

Confidential – Draft for Management Discussion

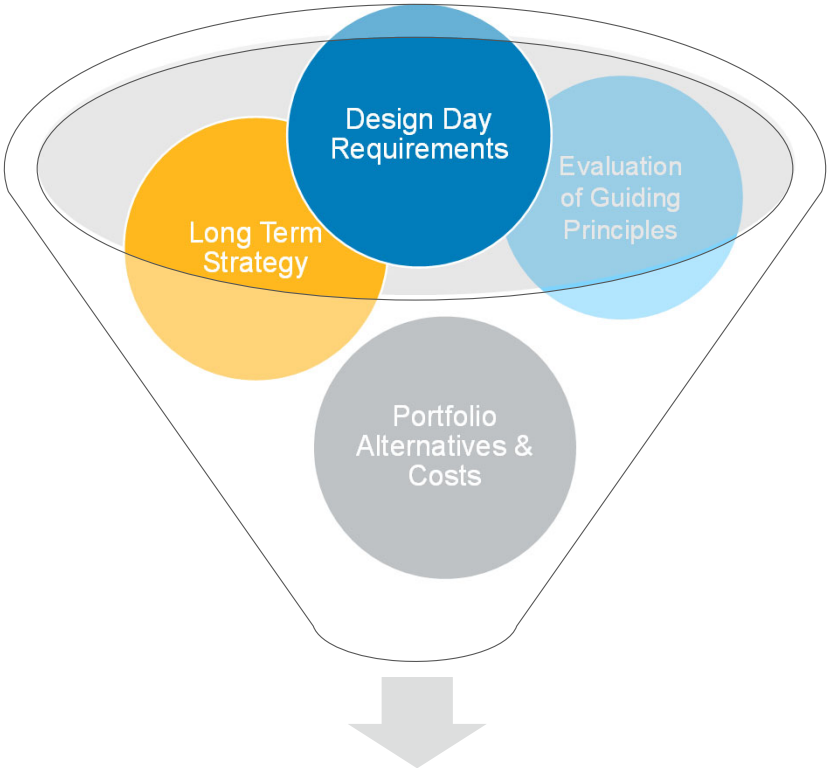
Sr Management Approval Presentation

September 2024

Agenda

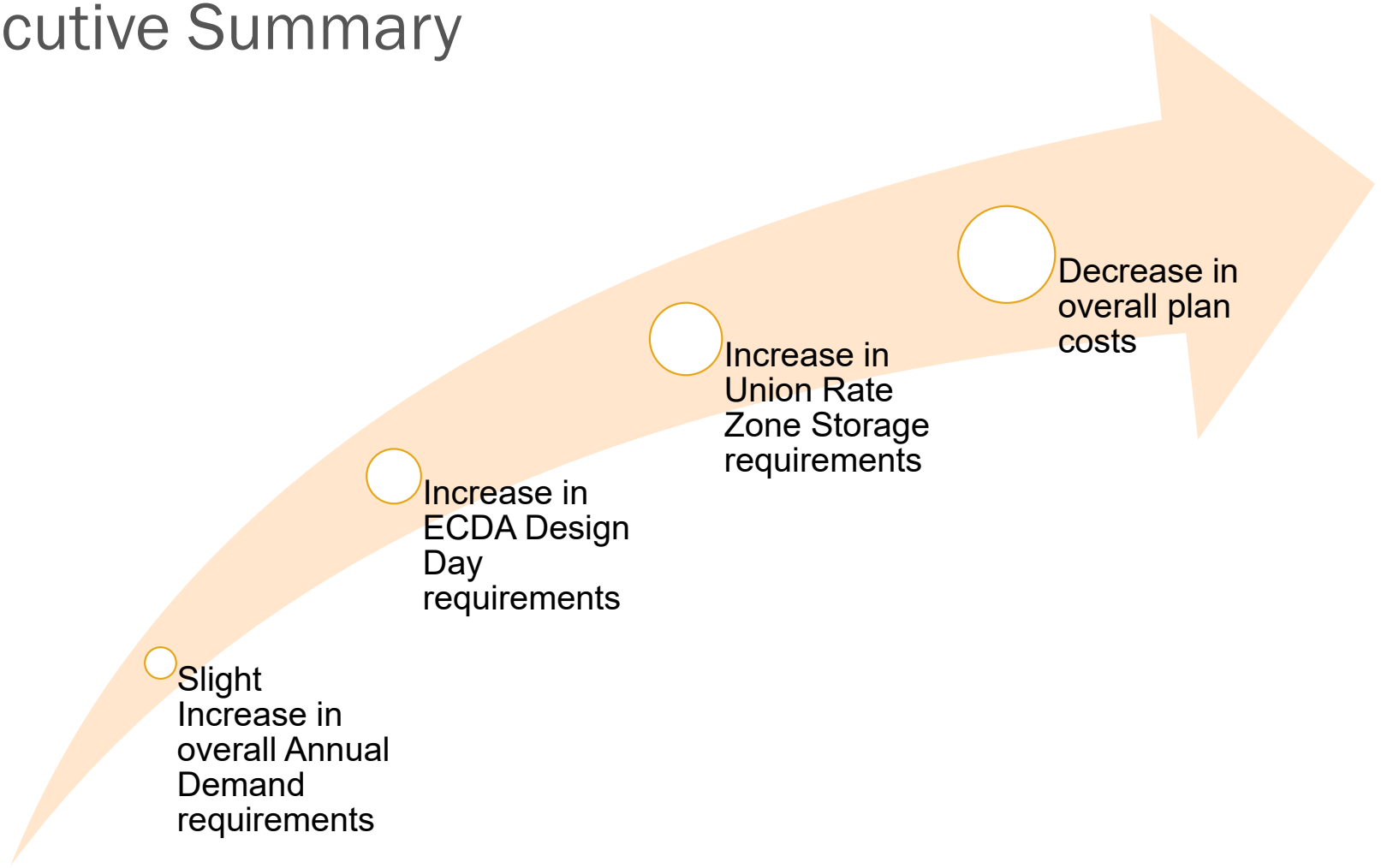
1. Process & Executive Summary
2. Plan Overview
3. Inputs
4. Outputs
5. Key Outcomes
6. Contract Renewals
7. Incremental Assets Required

Annual GSP & Acquisition Process



GSP Outcomes and Asset Acquisition Plan Recommendations

Executive Summary



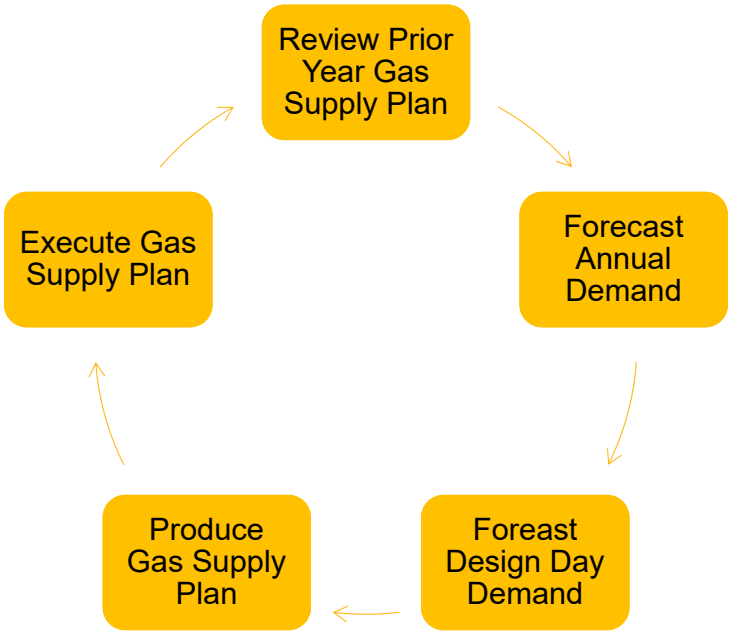
Gas Supply Plan Overview

Gas Supply Plan Overview

ENBRIDGE

- Objective of Gas Supply Plan (GSP):
  - Create an efficient supply portfolio that will meet the needs of sales service and bundled direct purchase customers, while adhering to our planning principles
  - The GSP is based on best known information at the time with a focus on the upcoming gas year
- GSP guides the long-term gas supply acquisition process
- GSP identifies the transportation and supply volume requirements to meet annual, seasonal and design day demand
- GSP is created with inputs from multiple groups
- Calibrated by the input assumptions, a linear optimization software (SENDOUT) is utilized to optimize the Plan to meet demand requirements

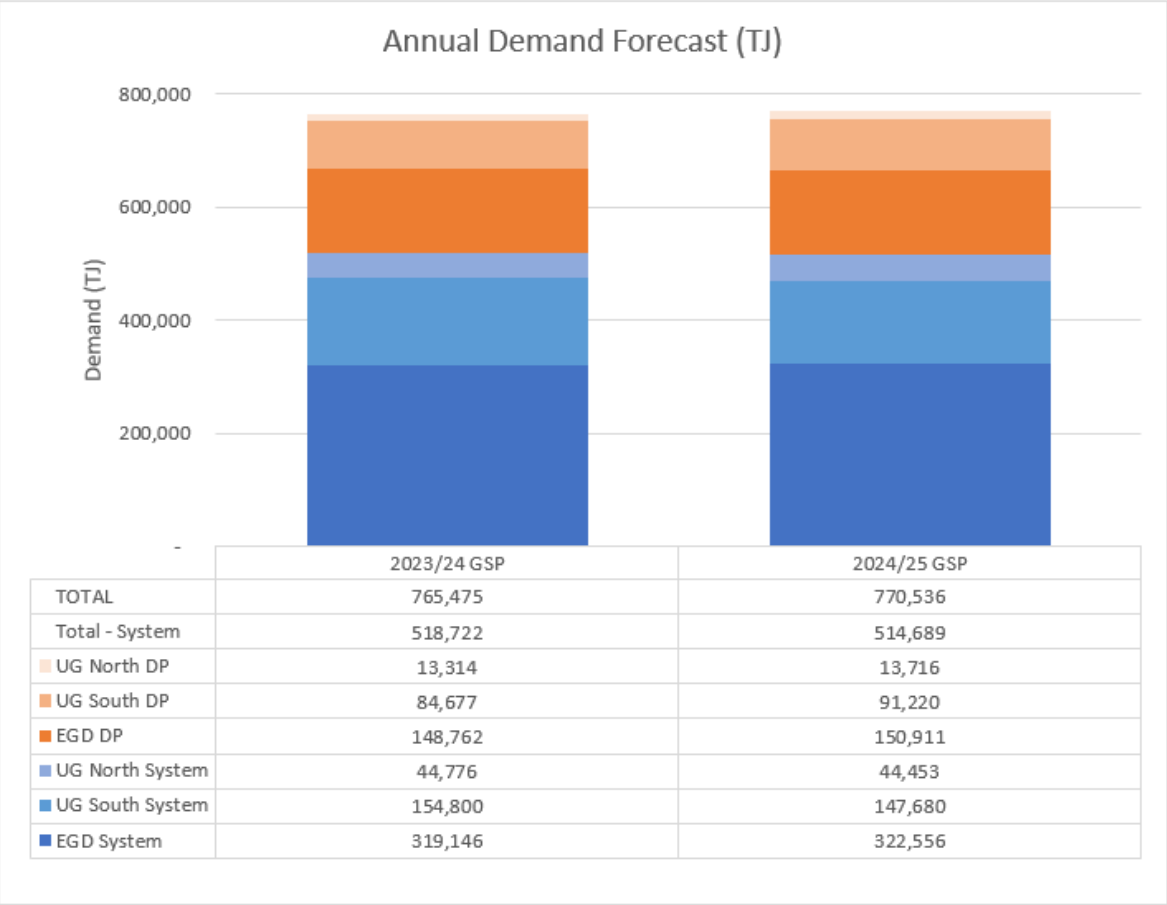
2024 Gas Supply Planning Process Overview



Feb-Aug	Aug-Sept	Aug-Sept	Feb	TBD
Produce GSP	Prepare & Execute Acquisition Plan	Approval	File Annual Update*	Stakeholder Conference

Gas Supply Plan Inputs

Annual Demand Forecast



	2023/24 GSP	2024/25 GSP
TOTAL	765,475	770,536
Total - System	518,722	514,689
UG North DP	13,314	13,716
UG South DP	84,677	91,220
EGD DP	148,762	150,911
UG North System	44,776	44,453
UG South System	154,800	147,680
EGD System	319,146	322,556

Comparison of Annual Demand Forecast to Prior Year (TJ)

	2023/24 GSP	2024/25 GSP	Variance	Variance (%)
UG North	58,091	58,169	78	0.1%
UG South	239,477	238,900	(577)	-0.2%
UG Total	297,568	297,069	(499)	-0.2%
EGD	467,907	473,467	5,559	1.2%
TOTAL	765,475	770,536	5,061	0.7%

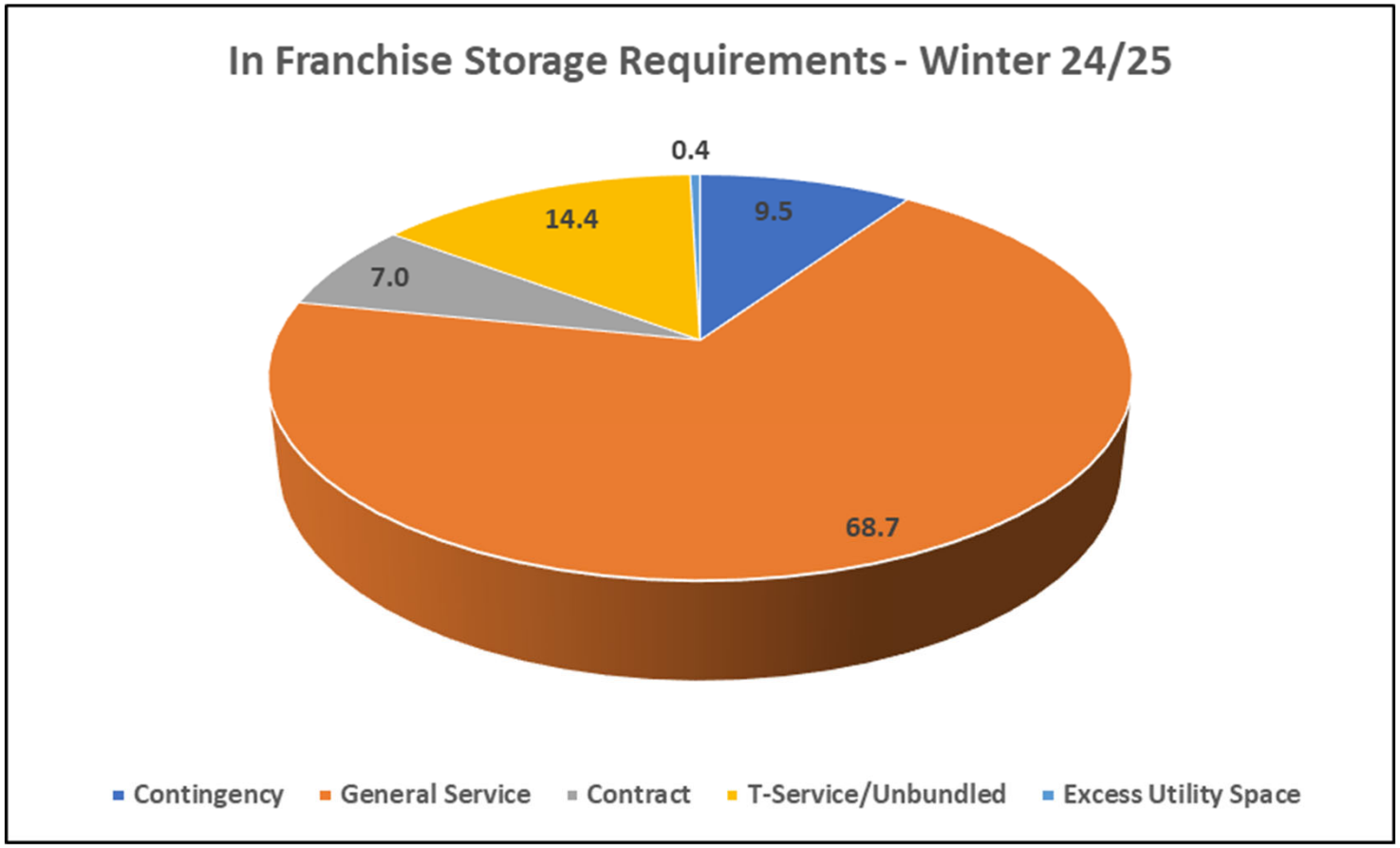
Design Day Demand Forecast – Summary

2024-25 Design Day Demand Forecast (GJ)

	EGD		U-North						U-South	TOTAL
	E-CDA	E-EDA	MDA	WDA	SSMDA	NDA	NCDA	EDA		
Demand	3,578,330	723,037	5,549	84,790	41,968	179,278	50,567	191,671	3,433,204	8,288,393
Supply - currently contracted	3,325,442	708,726	5,565	84,790	41,968	179,278	50,567	189,765	3,433,204	8,019,304
Design day surplus (shortfall)	(252,888)	(14,311)	16	-	-	-	-	(1,906)	-	(269,089)
Supply - proposed incremental:										
TransCanada ECOS - Empress to CDA	34,457	-	-	-	-	-	-	-	-	34,457
Peaking supply	97,289	14,311	(16)	-	-	-	-	1,906	-	113,490
Third-party assignment service	121,142	-	-	-	-	-	-	-	-	121,142
	252,888	14,311	(16)	-	-	-	-	1,906	-	269,089
Design day surplus (shortfall)	0	(0)	0	-	-	-	-	(0)	-	0
Peaking Supply - % of Demand	2.7%	2.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	
Comparison of design day demand to prior year:										
Prior-year design day demand (2023-24 GSP)	3,378,302	722,559	5,771	93,270	39,346	207,309	46,194	206,747	3,395,538	8,095,034
Increase (decrease) from prior-year	200,028	479	(222)	(8,480)	2,622	(28,031)	4,373	(15,076)	37,667	193,360
Increase (decrease) from prior-year (%)	5.9%	0.1%	-3.9%	-9.1%	6.7%	-13.5%	9.5%	-7.3%	1.1%	2.4%

In-franchise Storage Requirements

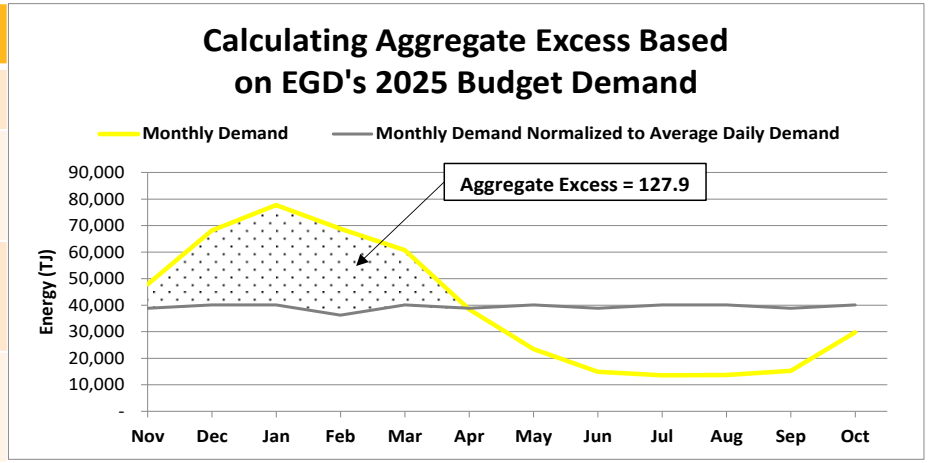
UG Rate Zone – Aggregate Excess



EGD RZ: Storage Requirement

- Updated Demand forecast results in a storage requirement of 127,918 TJ which is an increase of 473 TJ from the 2023 storage requirement and 2,218 TJ above the storage capacity held for the EGD rate zone

	2023B	2024B	Change
	TJ	TJ	TJ
Annual Demand	468,263	472,125	3,861
Winter Demand	321,164	323,235	2,071
Aggregate Excess	127,445	127,918	473



Enbridge Gas Ontario Storage Portfolio – Summary

In-Franchise Customers

(in PJ)	W2023/24	W2024/25	*Change*
Dawn	98.1	99.6	*+1.5*
Tecumseh	99.4	99.4	-
Crowland	0.3	0.3	-
Market Based Storage	26.0	26.0	-
In-franchise Storage Requirement	223.8	225.3	*+1.5*
Excess Dawn Storage for ST Sale	1.9	0.4	*-1.5*

Gas Supply Plan Outputs

Planned Dawn Supply Position: Daily Average Volumes

- Dawn supply is required to meet Enbridge Gas Ontario's System Sales annual and seasonal demand requirements

2024/25-2028/29 Gas Supply Plan Dawn Purchases - Daily Average

Particulars (GJ/d)	2023/24 Winter (23-33)	2024/25 Winter	2025 Summer	2025/26 Winter	2026 Summer	2026/27 Winter	2027 Summer	2027/28 Winter	2028 Summer	2028/29 Winter
South Dawn Supply	109,490	113,433	101,445	116,024	95,363	118,958	99,261	115,469	89,985	121,062
North East Dawn Supply	31,452	14,738	-	16,674	11,073	16,386	-	15,351	8,445	15,547
EGD Dawn Supply	379,783	303,559	59,057	288,664	48,683	288,522	42,584	285,711	26,863	288,157

EGD: Design Day Without Incremental DD Assets

EGD Rate Zone: 2024-25 Design Day Plan without Design Day Assets (TJ/d)

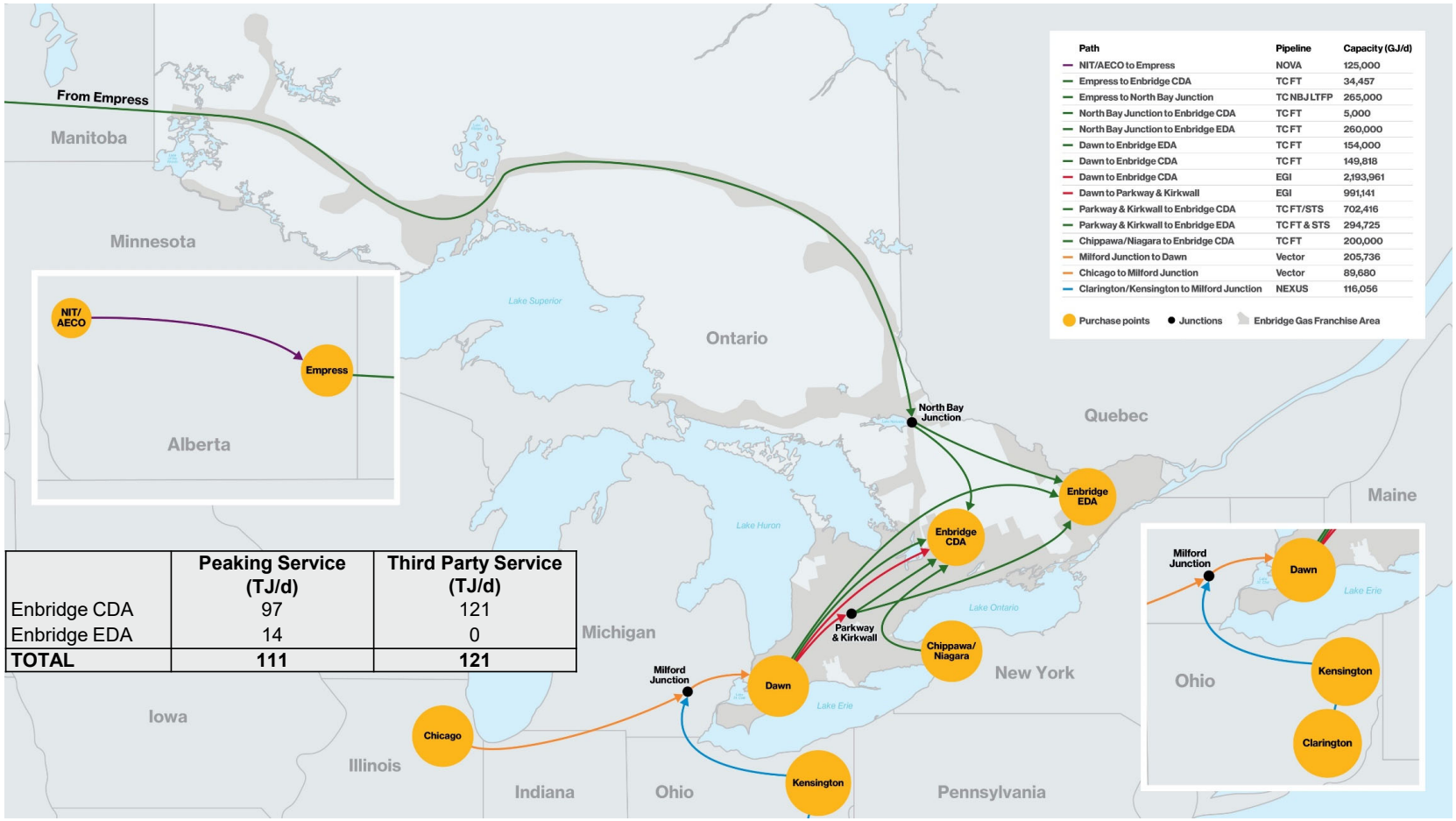
	CDA	EDA	Total
Design Day Demand			
Gross Design Day Demand	3,578	723	4,301
Curtailment	-	-	-
Net Design Day Demand	**3,578**	**723**	**4,301**
Design Day Supply Assets			
In-Franchise Supply	55	0	55
Peaking/Unsecured			-
Third-Party Services			-
TC Energy Long Haul	5	260	265
TC Energy Short Haul	787	368	1,155
TC Energy STS	284	81	365
EGD D-P	2,194	-	2,194
Design Day Supply Assets	**3,325**	**709**	**4,034**
Design Day Supply Assets Surplus/(Shortfall)	**(252.9)**	**(14.3)**	**(267.2)**
Shortfall % of Net Design Day Demand	**-7.1%**	**-2.0%**	**-6.2%**

EGD: Design Day With Incremental DD Assets

EGD Rate Zone: 2024-25 Design Day Plan with Design Day Assets (TJ/d)

	CDA	EDA	Total
Design Day Demand			
Gross Design Day Demand	3,578	723	4,301
Curtailment	-	-	-
Net Design Day Demand	**3,578**	**723**	**4,301**
Design Day Supply Assets			
In-Franchise Supply	55	0	55
Peaking/Unsecured	97	14	112
Third-Party Services	121	-	121
TC Energy Long Haul	39	260	299
TC Energy Short Haul	787	368	1,155
TC Energy STS	284	81	365
EGD D-P	2,194	-	2,194
Design Day Supply Assets	**3,578**	**723**	**4,301**
Design Day Supply Assets Surplus/(Shortfall)	**-**	**-**	**-**
Shortfall % of Net Design Day Demand	**0.0%**	**0.0%**	**0.0%**
Peaking % of Net Design Day Demand	**2.7%**	**2.0%**	

EGD: Transportation Portfolio



Path	Pipeline	Capacity (GJ/d)
NIT/AECO to Empress	NOVA	125,000
Empress to Enbridge CDA	TC FT	34,457
Empress to North Bay Junction	TC NBJ LTFP	265,000
North Bay Junction to Enbridge CDA	TC FT	5,000
North Bay Junction to Enbridge EDA	TC FT	260,000
Dawn to Enbridge EDA	TC FT	154,000
Dawn to Enbridge CDA	TC FT	149,818
Dawn to Enbridge CDA	EGI	2,193,961
Dawn to Parkway & Kirkwall	EGI	991,141
Parkway & Kirkwall to Enbridge CDA	TC FT/STS	702,416
Parkway & Kirkwall to Enbridge EDA	TC FT & STS	294,725
Chippawa/Niagara to Enbridge CDA	TC FT	200,000
Milford Junction to Dawn	Vector	205,736
Chicago to Milford Junction	Vector	89,680
Clarington/Kensington to Milford Junction	NEXUS	116,056

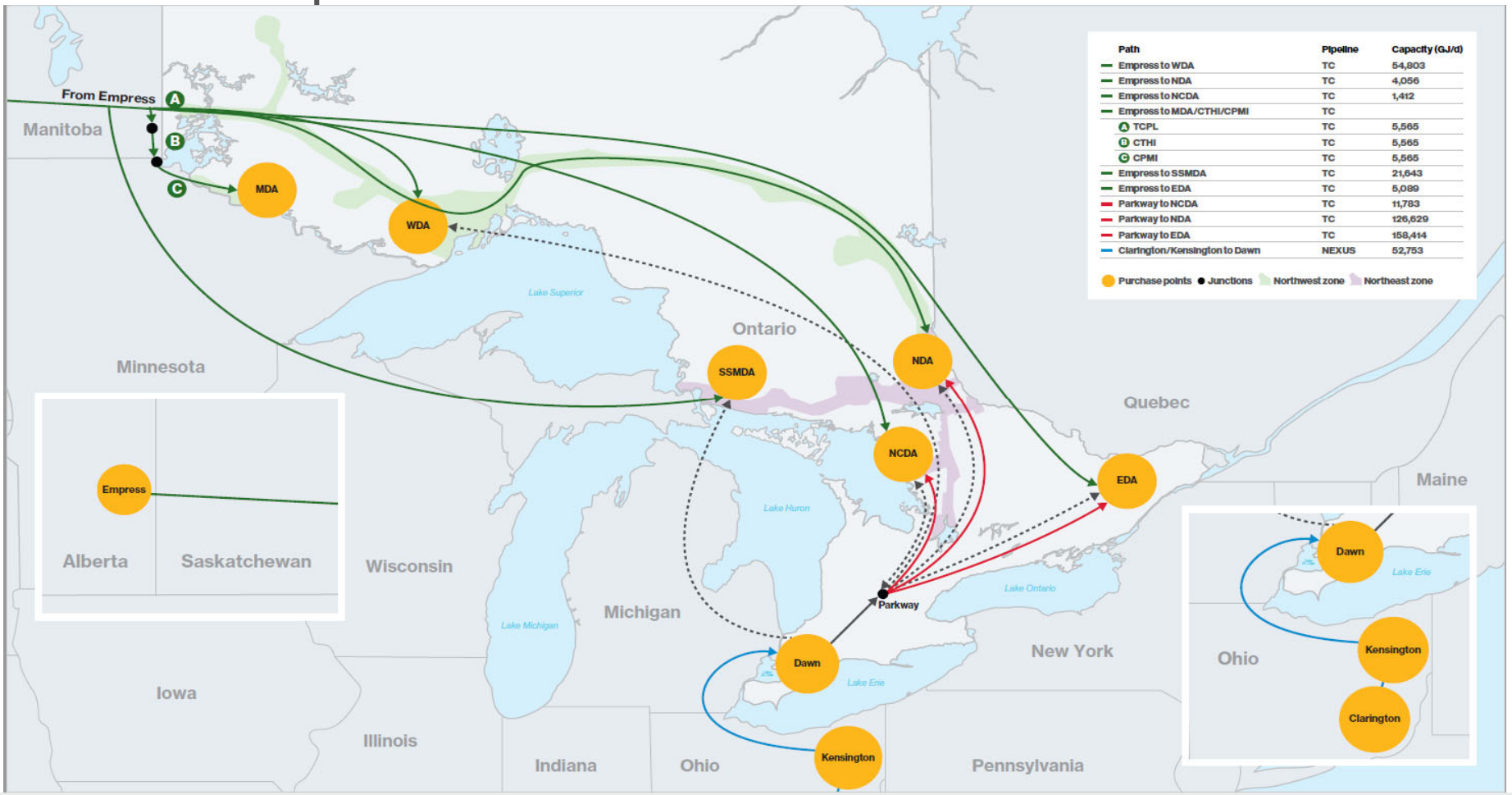
	Peaking Service (TJ/d)	Third Party Service (TJ/d)
Enbridge CDA	97	121
Enbridge EDA	14	0
TOTAL	**111**	**121**

Union North: Design Day

Winter 2024-25 Northern Firm Demand on Peak Day in GJ/Day (2024-34 Plan)

	MDA	WDA	SSMDA	NDA	NCDA	EDA	Total
Firm Demand							
Bundled Firm Contract Demand	-	4,313	1,399	4,356	-	14,660	24,727
Regular Rate Design Day Demand	5,549	80,476	40,183	146,887	48,580	162,725	484,401
T-Service Storage Redelivery Demand			386	11,406			11,792
North Dawn T-Service Demand				16,629	1,987	14,286	32,902
Peak Day Demand for the Region	**5,549**	**84,790**	**41,968**	**179,278**	**50,567**	**191,671**	**553,822**
Firm Supply							
TCPL FT from Empress	5,565	54,803	20,943	2,085	1,000	5,000	89,396
TCPL SH from Parkway				43,000	9,796	66,959	119,755
North Dawn T-Service				16,629	1,987	14,286	32,902
STS Firm Withdrawals from Parkway		29,987		48,375	13,704	26,351	118,417
STS Firm Pooling Withdrawls from Parkway				(8,649)	24,080		15,430
STS Firm Withdrawals from Dawn			21,025				21,025
LNG				10,838			10,838
Parkway to NDA/EDA/NCDA FT (Redelivery)				67,000		52,169	119,169
Parkway to EDA EMB						25,000	25,000
Peak Day Supply to the Region	**5,565**	**84,790**	**41,968**	**179,278**	**50,567**	**189,765**	**551,932**
Excess(Shortfall) by delivery area	16	-	-	-	-	(1,906)	(1,890)
Shortfall % of Peak Day Demand for the region	0.3%	0.0%	0.0%	0.0%	0.0%	-1.0%	-0.3%

North: Transportation Portfolio



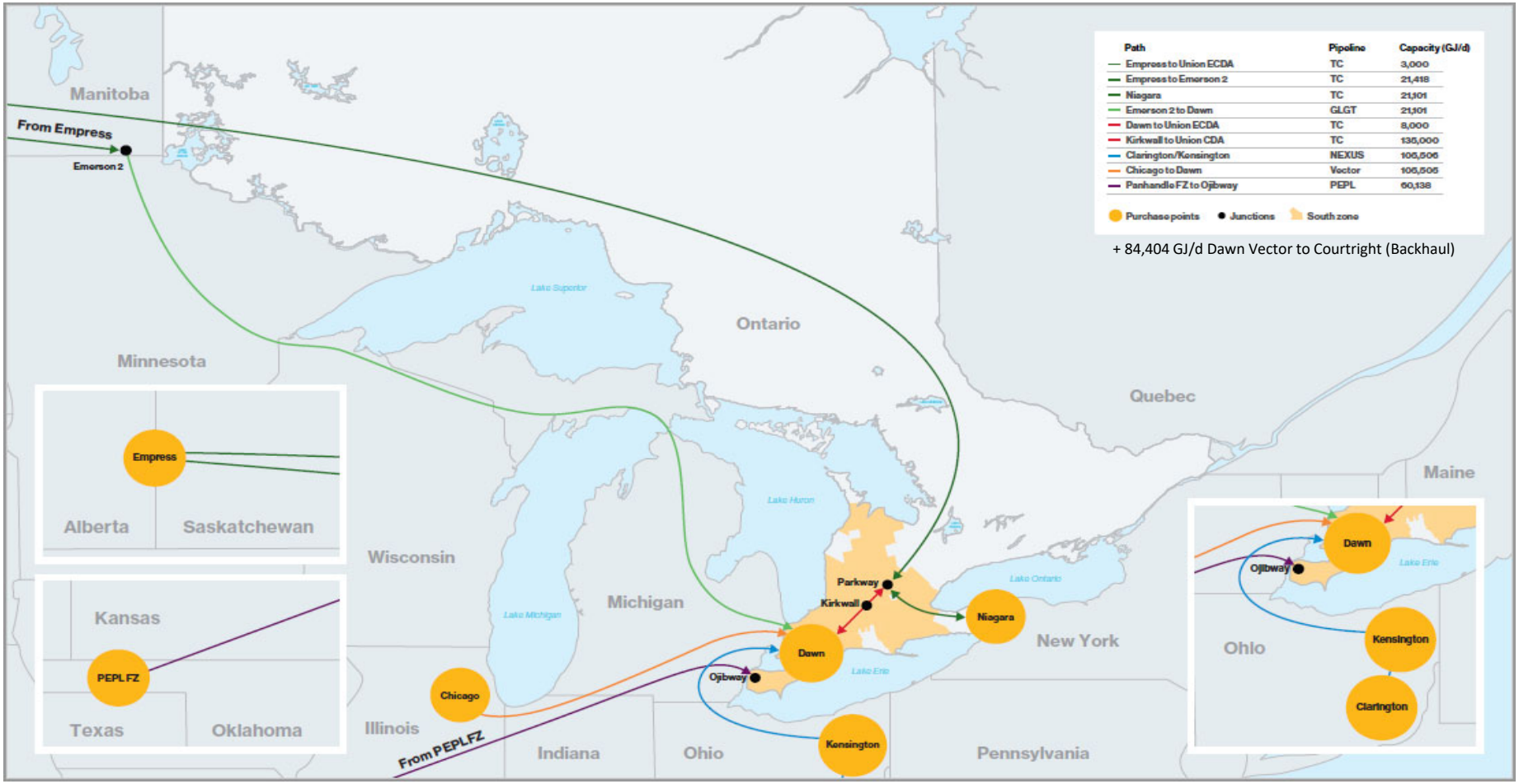
Union South: Design Day

Winter 2024/25
Union South Design Day Demand (TJ/d)

Demand	
Union South*	3,433
Supply	
Empress	3
Great Lakes	21
Nexus	106
Niagara	21
Non-obligated (e.g. Power Plants)	368
Ontario Dawn Deliveries	582
Ontario Parkway Deliveries	228
Panhandle	60
Storage at Dawn	1,938
Vector	106
Total Supply	3,433

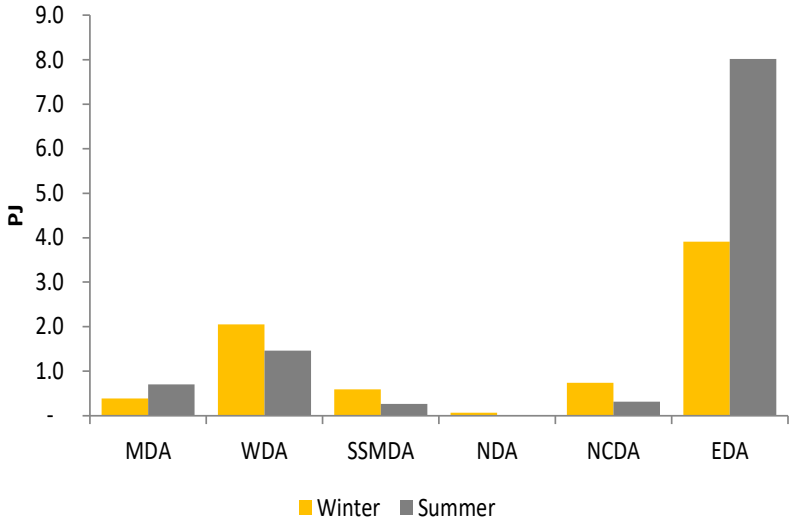
* includes Sales Service, Bundled Direct Purchase, and T-Service

South: Transportation Portfolio



+ 84,404 GJ/d Dawn Vector to Courtright (Backhaul)

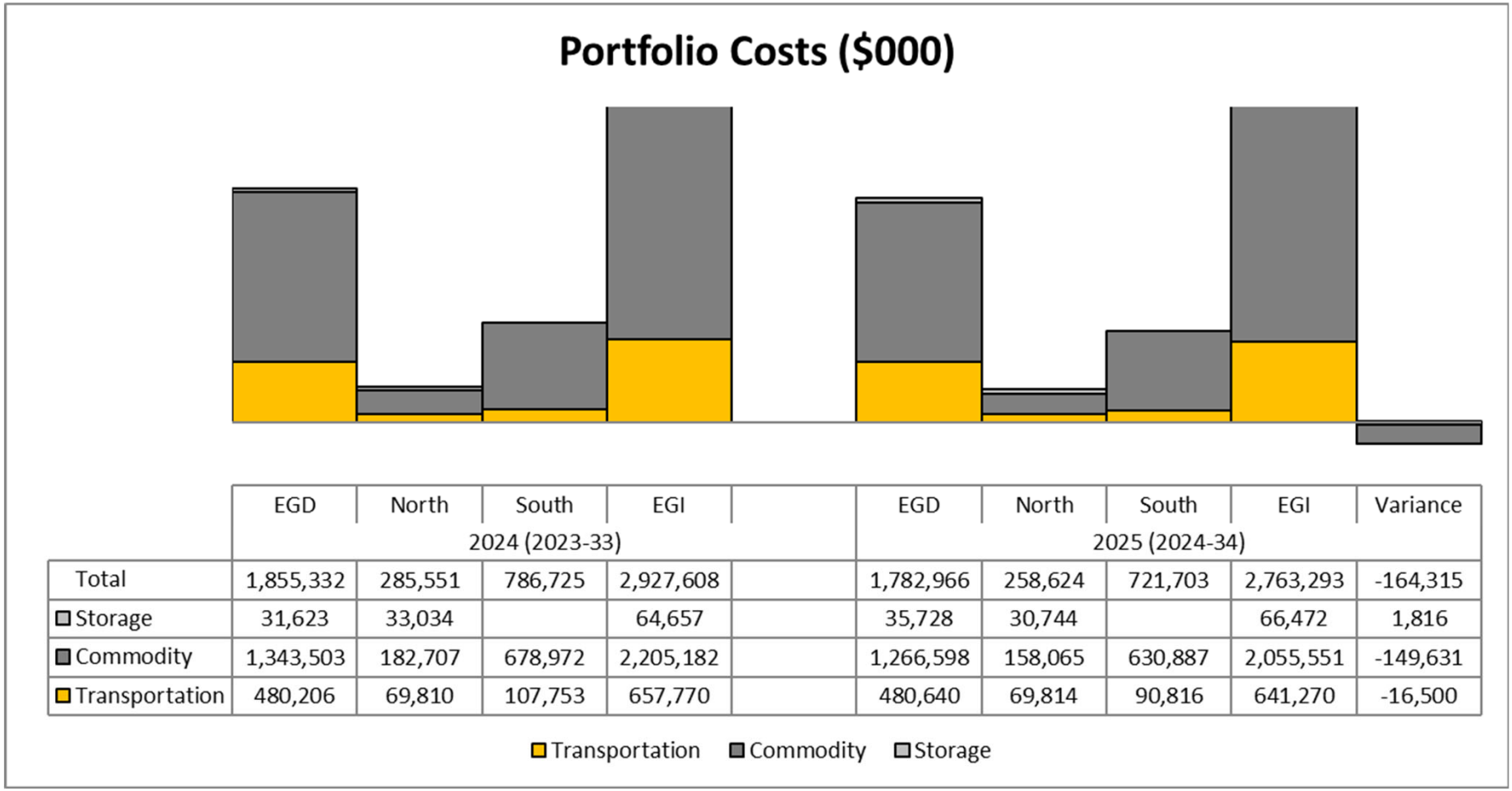
Unabsorbed Demand Charge (PJ)



Unabsorbed Demand Charge

Delivery Area	2023/24 GSP	2024/25 GSP Long-haul	2024/25 GSP Short-haul	2024/25 GSP Total	Increase (Decrease)
North West					
MDA	**1.4**	1.1	-	**1.1**	**(0.3)**
WDA	**6.7**	3.5	-	**3.5**	**(3.2)**
SSMDA	**2.3**	0.9	-	**0.9**	**(1.5)**
North East					-
NDA	**3.9**	0.1	-	**0.1**	**(3.8)**
NCDA	**0.1**	0.2	0.9	**1.0**	**1.0**
EDA	**4.3**	0.8	11.2	**11.9**	**7.6**
	18.7	**6.4**	**12.1**	**18.5**	**(0.2)**

Enbridge Gas Ontario – In-Franchise Portfolio Costs



	EGD	North	South	EGI		EGD	North	South	EGI	Variance
	2024 (2023-33)					2025 (2024-34)				
Total	1,855,332	285,551	786,725	2,927,608		1,782,966	258,624	721,703	2,763,293	-164,315
Storage	31,623	33,034		64,657		35,728	30,744		66,472	1,816
Commodity	1,343,503	182,707	678,972	2,205,182		1,266,598	158,065	630,887	2,055,551	-149,631
Transportation	480,206	69,810	107,753	657,770		480,640	69,814	90,816	641,270	-16,500

Key Outcomes

Key Outcomes

ENBRIDGE

Outcome	EGD	Union North	Union South	TOTAL Enbridge Gas Ontario
System Supply Purchases	322 PJ	45 PJ	155 PJ	518 PJ
Winter Dawn average purchases	304 TJ/d	14 TJ/d	113 TJ/d	431 TJ/d
In-franchise storage capacity	125.7 PJ	99.6 PJ		225.3 PJ
UDC	None	18.5 PJ	None	18.5 PJ
Change in Design Day Demand	+200 TJ/d (+4.9%)	- 44.8 TJ/d (-7.5%)	+37 TJ/d (+1.1%)	+193,360 GJ/d (+2.4%)
Portfolio Costs	$1,783M	$259M	$721M	$2,763M

Key Messages

- All rate zones reflect a diverse asset mix: path, supply, service, storage
- Demand changes
  - EGD Rate Zone
    - **Annual demand**:
      - YoY increase of 5 TJ (.7%)
      - Winter Dawn purchases decrease 76 TJ/d (20%).
    - **Design day demand**:
      - Significant shortfall in ECDA met with long-haul transportation, 3rd Party Service and remaining 2.7% Peaking for 2024/25 to transition to new design day methodology ;
      - Shortfall of 2.0% for E-EDA served with peaking supply.
  - UG Rate Zone
    - **Annual demand**:
      - Little change from previous year
      - Winter Dawn purchases decrease 13 TJ/d (9%).
    - **Design day demand**:
      - North: All STS withdrawal rights are utilized, decreased reliance on Hagar in NDA.
      - South: No shortfall as demand can be met through existing assets

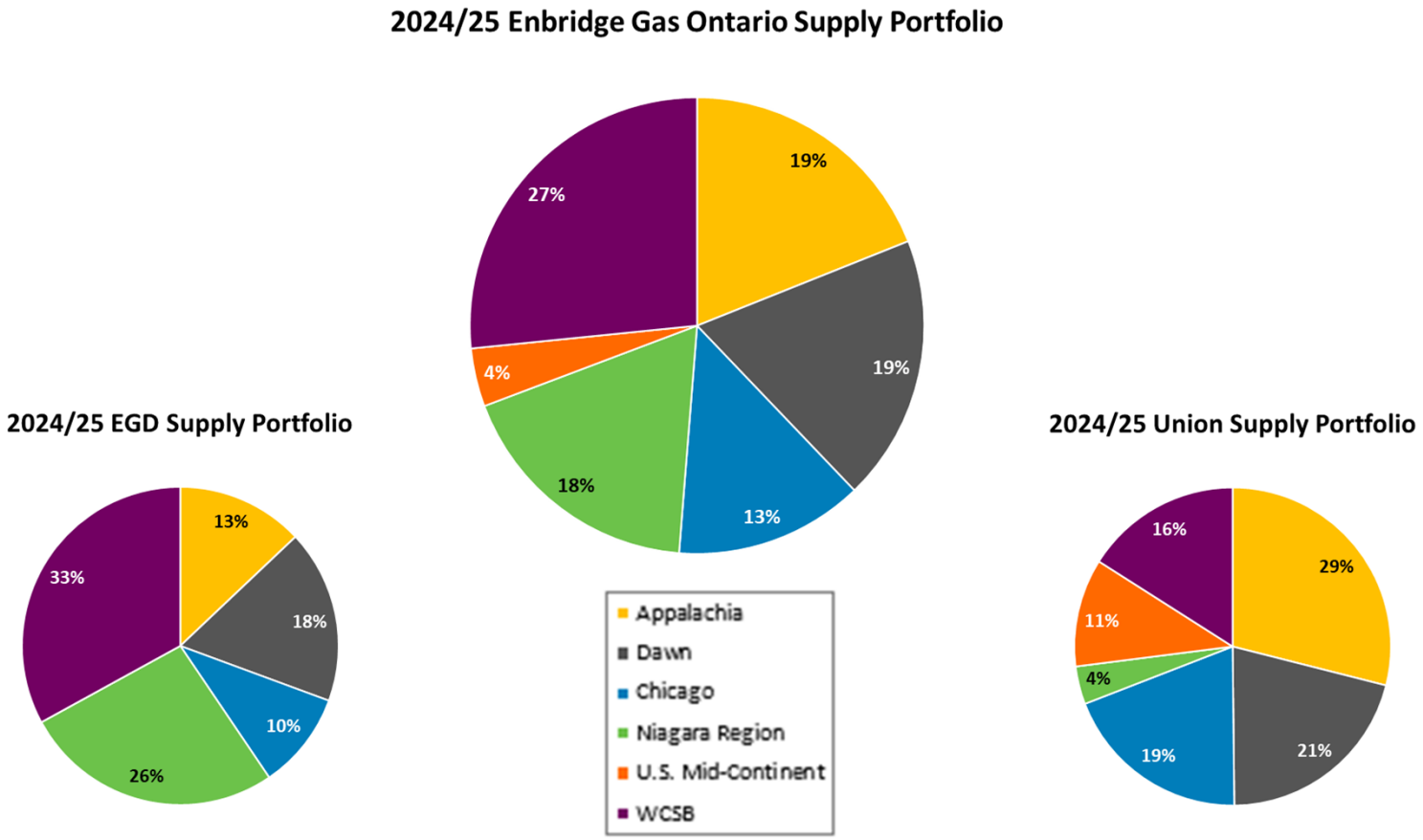
Asset Acquisition Recommendations

Actions Required for Plan Year

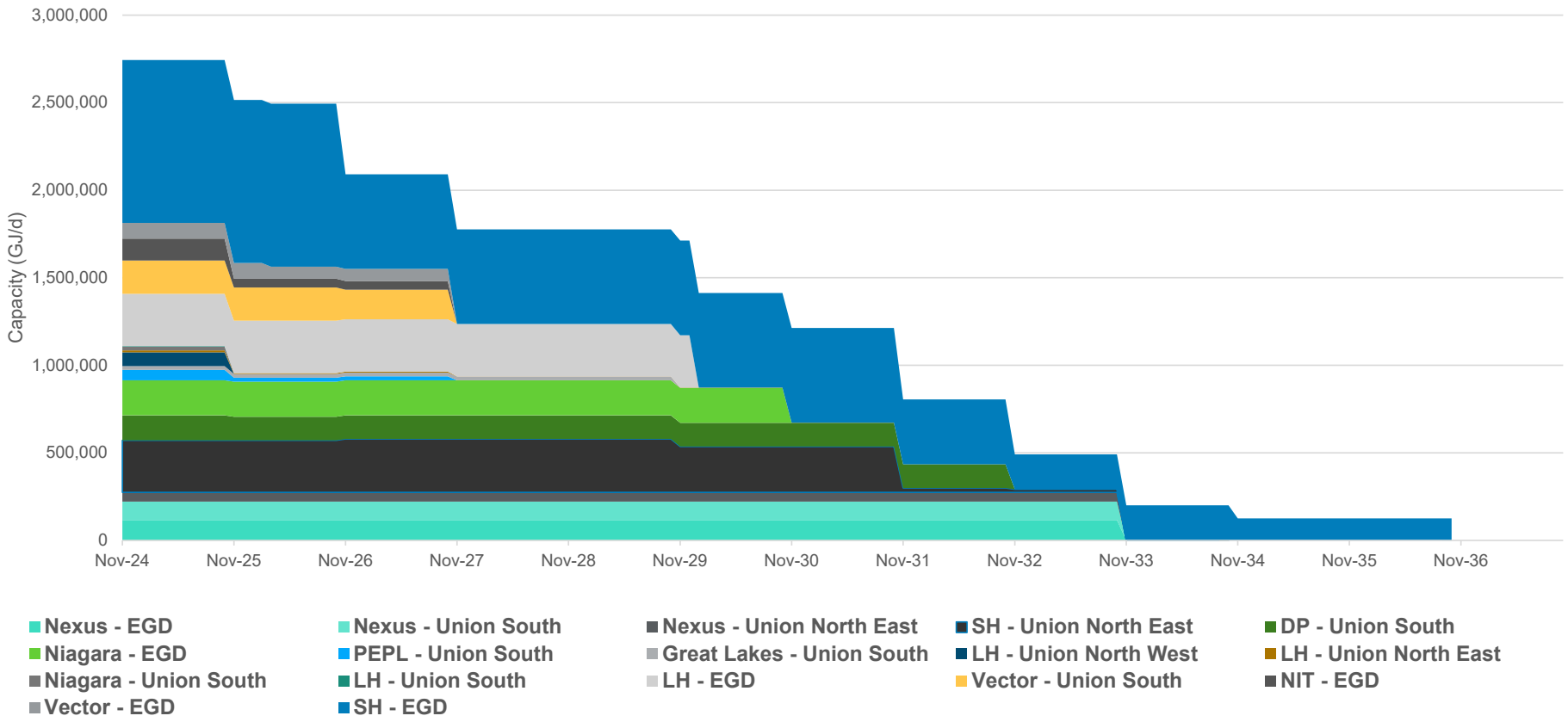
	EGD	Union North	Union South
Supply Purchases: Dawn/Uncommitted	Winter = 303,559 GJ/d Summer = 59,057 GJ/d	Winter = 14,738 GJ/d Summer = 0 GJ/d	Winter = 113,433 GJ/d Summer = 101,445 GJ/d
Design Day Shortfall Met with Peaking Services	Enbridge CDA = 97 TJ/d Enbridge EDA = 14 TJ/d	Union EDA = 1,906 GJ/d	None
3rd Party Assignment Service	Enbridge CDA = 121,142 GJ/d		
Transportation: Other	• Evaluate upstream market alternatives	• Evaluate upstream market alternatives	• Evaluate upstream market alternatives • PEPL and Vector Renewal
Storage: Market Based Contract Renewals	10 PJ expiring Spring 2025	None	None
Storage: Incremental In-Franchise	No Change	+1.5 PJ (reducing excess utility storage)	

Enbridge Gas Ontario

Supply Portfolio



Transportation Portfolio Term – 2024 Update



Acquisitions Recommendations

- 3rd party storage
  - No change in 3rd party storage volume to be purchased
  - Contract to replace ~10 PJ expiring in 2025 through blind RFP process
    - Rebasing Phase II timing will be considered
- Review all TCPL contracts expiring October 31, 2025
- Review Bluewater and St. Clair Pipeline contracts expiring October 31, 2024
- Contract Third Party service for Enbridge CDA as of December 1, 2024
- Evaluate renewals of contracts expiring October 31, 2025
  - Notice to be provided by October 31, 2024
    - Vector 80,000 Dth/d
    - PEPL 35,000 Dth/d

Acquisitions Recommendations (continued)

- EGD rate zone peaking services
  - Purchase third-party peaking service for winter term to meet peak day requirements
    - 97 TJ for Enbridge CDA (December to March)
    - 14 TJ for Enbridge EDA (December to March)
- Union rate zone peaking services
  - Purchase third-party peaking service for winter term to meet peak day requirements
    - 1.9 TJ for Union EDA (December to March)
- Union rate zone transportation services
  - Reduce 0.2 TJ of CTHI/CPMI capacity for Union MDA for 1-year (was increased by 0.2 TJ last year for peaking service)

Thank-you

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Issue:

7

Reference:

Decision on Issues List, Schedule A: Approved Issues List, Issue 7

Question(s):

a) Has Enbridge Gas considered filing its gas supply plans with the OEB prior to the start of the gas year to ensure that regulatory and stakeholder input can inform Enbridge Gas's gas supply planning in advance of key gas supply planning decisions? Please explain why or why not.

b) Please discuss any implications, if any, if Enbridge Gas were to file its gas supply plans with the OEB prior to the start of the gas year.

Response:

a-b) No. Enbridge Gas acknowledges that there is no filing date that would allow for a regulatory process to be completed in advance of the start of the next gas year (November 1), while also ensuring the gas supply plan reflects the most current demand forecast. Accordingly, Enbridge Gas proposes to maintain the annual filing date of March 1 for future Annual Updates related to the current gas year.

As outlined in Section 2.3 of the filed evidence[1], the annual gas supply planning process starts with preparation of the demand forecast over the April to July period leading to the development of the gas supply plan in July and August. Following completion of the gas supply plan, incremental contracting analysis is conducted as required, followed by internal senior management review and approval in September. These steps are necessary to ensure Enbridge Gas is operationally ready for the start of the immediate winter season on November 1.

[1] EB-2025-0065, p.10.

Given this timeline, the time between the completion of the gas supply plan in September and the start of the gas year on November 1 is insufficient to accommodate a full regulatory process.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition (VECC)

Interrogatory

Issue:

7

Reference:

Section 1

Question(s):

a) Does EGI have any concerns with the OEB's Framework for the Assessment of Distributor Gas Supply Plans? If so, what changes might the Board and interested parties consider to make the process more efficient?

b) In Phase 3 of the harmonization and rebasing of rates (EB-2025-0064) EGI has proposed a number of changes to class harmonizations and rate design including the SFVD rate design. Would any of these proposals or variations of them as approved by the Board have a significant impact on gas supply planning including the forecasting of demand? Specifically, in EGI's view should the Framework be revisited subsequent to the Board's decision in EB-2025-0064?

Response:

a) Enbridge Gas has no concerns with the OEB's Gas Supply Plan Framework (Framework)[1] in its current form.

As explained in response at Exhibit I.7-STAFF-1, the OEB should proceed cautiously when considering any proposed changes to the Framework to ensure that any such decisions are made with a full understanding of their practical implications to Enbridge Gas's established business and planning processes. For example, proposals to adjust the timing of future Annual Updates or 5-Year Gas Supply Plans must be considered in the context of Enbridge Gas's annual demand forecasting and gas planning processes.

[1] EB-2017-0129, Report of the Ontario Energy Board, October 2018.

b) No, in Enbridge Gas's view, there is no reason to revisit the Framework subsequent to the OEB's decision in Phase 3 of the 2024 Rebasing Application[2]. Enbridge Gas does not expect the rate design harmonization proposals in Phase 3 to have a material impact on Enbridge Gas's demand forecast and gas supply plan.

[2] EB-2025-0064.