

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board  
Act, 1998, S.O. 1998, c.15 (Sched. B);

**AND IN THE MATTER OF** an Application by  
Enbridge Gas Inc., pursuant to section 36(1) of  
the *Ontario Energy Board Act, 1998*, for an  
order or orders approving or fixing just and  
reasonable rates and other charges for the sale,  
distribution, transmission and storage of gas as  
of January 1, 2020.

### **APPLICATION**

1. The Applicant, Enbridge Gas Inc. (“Enbridge Gas”, or “EGI”) is an Ontario corporation with its head office in the City of Toronto. It carries on the business of selling, distributing, transmitting, and storing natural gas within Ontario. Enbridge Gas was formed effective January 1, 2019, upon the amalgamation of Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Limited (“Union”).
2. Enbridge Gas hereby applies to the Ontario Energy Board (the “Board”), pursuant to section 36 of the *Ontario Energy Board Act, 1998*, as amended (the “Act”) for interim and final Orders approving or fixing just and reasonable rates for the sale, distribution, transmission, and storage of gas commencing January 1, 2020.
3. On August 30, 2018, in the MAADs Decision<sup>1</sup>, the Board approved a rate setting mechanism (Price Cap IR) for Enbridge Gas, which sets out a multi-year incentive rate-setting mechanism (“IRM”) for the calendar year term of 2019 to 2023 (the “five year term”). The MAADs Decision confirmed that during the five year term,

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<sup>1</sup> EB-2017-0306/0307.

distribution rates will be set separately for the EGD and Union rate zones. The MAADs Decision also approved the specific treatment of various elements in the IRM including the availability of an Incremental Capital Module (“ICM”) during the five year term. Additionally, the MAADs Decision set out certain items that Enbridge Gas is required to file over the course of the five year term, including a cost allocation study that takes account of certain large projects undertaken by Union that have already come into service.

4. This 2020 Rate Application is the second annual rate adjustment application under the IRM approved in the MAADs Decision.
5. Enbridge Gas received the Board’s Decision and Order for 2019 Rates<sup>2</sup> on September 12, 2019 (supplemented on September 23, 2019), and filed a draft Rate Order on September 30, 2019. In the 2019 Rates Decision and Order, the Board indicated concern with the timing and complexities of that application, and indicated that “Enbridge Gas should reflect on its approach and timeliness for the 2020 application”.<sup>3</sup>
6. Enbridge Gas has followed the Board’s direction, and has prepared an application that is as simple as possible and that can be processed and adjudicated in a bifurcated manner to allow updated interim rates to be in place for January 1, 2020.
7. With this Application, Enbridge Gas is filing all required supporting evidence in connection with the IRM adjustment to distribution rates for the EGD and Union rate zones, including draft Rate Orders. This will allow the Board to consider and approve distribution rates that can be implemented on an interim basis on

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<sup>2</sup> EB-2018-0305.

<sup>3</sup> EB-2018-0305, Decision and Order on Effective Date, September 23, 2018, at page 5.

January 1, 2020. The items to be reviewed and approved in this regard for each rate zone are largely mechanistic and include:

- the annual rate escalation, as determined by a price cap index (“PCI”), where PCI growth is driven by an inflation factor using GDP IPI FDD, less a productivity factor of zero and a stretch factor of 0.30%;
  - the pass-through of routine gas commodity and upstream transportation costs, demand side management cost changes, lost revenue adjustment mechanism changes for the contract market, and average use/normalized average consumption;
  - capital pass-through adjustment;
  - PDO rate adjustment; and
  - the continuation of certain deferral and variance accounts.
8. As soon as possible after the filing of this Application, Enbridge Gas plans to file further evidence addressing two discrete items that can be reflected and implemented when final rates are approved.
9. First, Enbridge Gas will file Incremental Capital Module (ICM) request for one or two projects. The supporting evidence for the ICM request will be filed by late October 2019.
10. Second, as required by the MAADs Decision<sup>4</sup>, Enbridge Gas will file a cost allocation study for the Union rate zones that takes into account four projects (Panhandle Reinforcement, Dawn-Parkway expansion including Parkway West, Brantford-Kirkwall/Parkway D and the Hagar Liquefaction Plant) and that includes a proposal for addressing TransCanada’s C1 Dawn to Dawn TCPL service. This evidence will be filed by mid November 2019.

11. Enbridge Gas therefore applies to the Board for such final, interim or other Orders, accounting orders and deferral and variance accounts as may be necessary in relation to approve:
  - Interim and final rates for the year commencing January 1, 2020, including all adjustments resulting from the application of Enbridge Gas's Board-approved IRM;
  - The continuation of approved deferral and variance accounts for 2020;
  - The request for ICM funding;
  - Any rate and rate class adjustments that the Board deems to be appropriate and required in light of the Union rate zone cost allocation study; and
  - The determination of all other issues that bear upon the Board's approval or fixing of just and reasonable rates for the sale, distribution, transmission, and storage of gas by Enbridge Gas for the year commencing January 1, 2020.
12. Enbridge Gas respectfully requests that the Board establish a process to allow the IRM rate adjustment to be reviewed and approved by November 29, 2019, so that the resulting rates can be implemented on an interim basis in conjunction with the January 1, 2020 QRAM application. Implementing these rates on an interim basis effective January 1, 2020 reduces the impact of out of period adjustments on customers.
13. Alternatively, Enbridge Gas requests that the Board approve the rates resulting from the IRM rate adjustment on an interim basis by November 29, 2019, without making a final determination on the merits. This would allow updated distribution rates to be in place for January 1, 2020, and would preserve the rights of the Board to make a later decision (with any appropriate process and participation of

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<sup>4</sup> MAADs Decision, at page 41.

other parties) that could be implemented into final rates on a full year basis along with any impacts of the other items in this Application (ICM and cost allocation study).

14. Enbridge Gas respectfully requests that the Board establish a further process to consider the additional items being filed for approval – the ICM request and the cost allocation study. Enbridge Gas proposes that these items can be reviewed through one process, and that any resulting approvals can be implemented through the approval of final rates and rate rider(s).

#### **APPROVAL REQUESTS**

15. The specific approvals sought in this Application are as follows:
  - Interim rates for the year commencing January 1, 2020, including all adjustments resulting from the application of Enbridge Gas's Board-approved IRM, to be approved by November 29, 2019 for implementation on January 1, 2020 along with the QRAM Application for the same date;
  - The continuation of approved deferral and variance accounts for 2020;
  - The request for ICM funding
  - Final rates for the year commencing January 1, 2020, including the full-year impact of all items included in the Application (IRM rate adjustment, ICM request and any rate and rate class adjustments that the Board deems to be appropriate and required in light of the Union rate zone cost allocation study); and
  - The determination of all other issues that bear upon the Board's approval or fixing of just and reasonable rates for the sale, distribution, transmission, and storage of gas by Enbridge Gas for the year commencing January 1, 2020.

16. Enbridge Gas further applies to the Board pursuant to the provisions of the Act and the Board's Rules of Practice and Procedure for such final, interim or other Orders and directions as may be appropriate in relation to the Application and the proper conduct of this proceeding.
17. This Application is supported by written evidence and may be amended from time to time as circumstances require.
18. The persons affected by this application are the customers resident or located in the municipalities, police villages and First Nations reserves served by Enbridge Gas, together with those to whom Enbridge Gas sells gas, or on whose behalf Enbridge Gas distributes, transmits or stores natural gas.
19. Approval of the IRM rate adjustment set out in this Application will result in the following bill impacts:
  - the net annual bill increase for a typical EGD residential customer consuming 2,400 m<sup>3</sup> per year will be approximately \$7.53 per year for sales service customers and \$7.51 per year for bundled direct purchase customers, each excluding any 2020 ICM impacts;
  - the net annual bill increase for a typical Union South residential customer consuming 2,200 m<sup>3</sup> per year will be approximately \$4.26 per year for sales service customers and \$4.19 per year for bundled direct purchase customers, each excluding any 2020 ICM impacts; and
  - the net annual bill increase for a typical Union North residential customer consuming 2,200 m<sup>3</sup> per year will range from approximately \$5.03 to \$5.80 per year for sales service customers and bundled direct purchase customers, each excluding any 2020 ICM impacts.

Approval of the ICM request will have a bill impact of less than \$2.00 during 2020 for a typical residential customer in all rate zones.

20. The address of service for Enbridge Gas is:

Enbridge Gas Inc.

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- and -

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DATED October 8, 2019, at Toronto, Ontario

ENBRIDGE GAS INC.

*(Original signed by)*

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Rakesh Torul  
Technical Manager,  
Regulatory Applications