



Anton Kacicnik  
Manager  
Regulatory Applications  
Regulatory Affairs

Tel: 416-495-6087  
Email: [Anton.Kacicnik@enbridge.com](mailto:Anton.Kacicnik@enbridge.com)  
[EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)

Enbridge Gas Inc.  
500 Consumers Road  
North York, Ontario, M2J 1P8  
Canada

September 28, 2023

**VIA RESS AND EMAIL**

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File No.: EB-2023-0196  
2024 Federal Carbon Pricing Program Application  
Application and Evidence**

---

Enclosed is the application and pre-filed evidence of Enbridge Gas for its 2024 Federal Carbon Pricing Program (the Application).

Enbridge Gas is seeking OEB approval of just and reasonable rates effective April 1, 2024, for the EGD and Union rate zones, to recover the costs associated with the GGPPA and EPS Regulation as a pass-through to customers. Enbridge Gas is also seeking OEB approval to dispose of the 2022 balances recorded in its FCPP-related deferral and variance accounts, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs), effective April 1, 2024.

Subject to the OEB's decision, Enbridge Gas intends to reflect 2024 increases to rates for the Federal Carbon Charge and Facility Carbon Charge, and the one-time billing adjustment related to the disposition of 2022 FCPP-related deferral and variance account balances as early as the April 1, 2024 Quarterly Rate Adjustment Mechanism (QRAM) application.

Enbridge Gas requests that the OEB issue orders granting the approvals requested on a final basis by February 8, 2024. Should the OEB determine that it is not possible to review and grant the approvals requested by such date, Enbridge Gas requests that the OEB grant approval of just and reasonable rates effective April 1, 2024 on an interim basis by February 8, 2024. Given the significance of Enbridge Gas's obligations under the GGPPA and EPS Regulation and considering the magnitude of the associated rate increases, it is appropriate to avoid continued accumulation of unbilled and uncollected

September 28, 2023

page 2

amounts from customers that could result in a larger impact on bills when such amounts are recovered in the future.

If you have any questions, please contact the undersigned.

Sincerely,

*(Original Signed)*

Anton Kacicnik  
Manager Regulatory Applications

EXHIBIT LIST

A – ADMINISTRATION

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
A	1	1	Exhibit List
		2	Application
		3	Glossary of Acronyms and Defined Terms
	2	1	Overview
		2	Federal Carbon Charge Impact On Customer Consumption

B- FORECASTS

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
B	1	1	Forecasts – Overview
			Appendix A – Enbridge Gas Estimated EPS Compliance Obligation
	2	1	Forecasts - EGD Rate Zone
		2	EGD Rate Zone – 2024 Customer Related Volume Forecast by Rate Class (April 2024 to March 2025)
		3	EGD Rate Zone – 2024 Facility Related Volume Forecast
		4	EGD Rate Zone – 2024 Forecast Compressor Emissions
5	EGD Rate Zone - 2024 Forecast EPS Obligation		
6	EGD Rate Zone – 2024 Summary of Customer-Related and Facility-Related Costs		

EXHIBIT LIST

B- FORECASTS

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
	3	1	Forecasts - Union Rate Zones
		2	Union Rate Zones – 2024 Customer-Related Volume Forecast by Rate Class (April 2024 to March 2025)
		3	Union Rate Zones - 2024 Facility-Related Volume Forecast
		4	Union Rate Zones – 2024 Forecast Compressor Emissions
		5	Union Rate Zones – 2024 Forecast EPS Obligation
		6	Union Rate Zones – 2024 Summary of Customer-Related and Facility-Related Costs

C – DEFERRAL AND VARIANCE ACCOUNTS

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
C	1	1	Deferral and Variance Accounts

D - COST RECOVERY

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
D	1	1	Cost Recovery
	2	1	EGD Rate Zone – Derivation of Federal Carbon Charge and Facility Carbon Charge Unit Rates
		2	EGD Rate Zone - Bill Impacts
		3	EGD Rate Zone – FCPP-Related Deferral and Variance Accounts Balances and Allocation

EXHIBIT LIST

D - COST RECOVERY

<u>Exhibit</u>	<u>Tab</u>	<u>Schedule</u>	<u>Contents</u>
D	2	4	EGD Rate Zone – FCPP-Related Deferral and Variance Account Clearance Unit Rates
		5	EGD Rate Zone – FCPP-Related Deferral and Variance Account Clearance Bill Impacts
	3	1	Union Rate Zones – Derivation of Federal Carbon Charge and Facility Carbon Charge Unit Rates
		2	Union Rate Zones – Bill Impacts
		3	Union Rate Zones – FCPP-Related Deferral and Variance Account Balances and Allocations
		4	Union Rate Zones – FCPP-Related Deferral and Variance Account Clearance Unit Rates and Ex-Franchise Amounts
		5	Union Rate Zones – FCPP - Related Deferral and Variance Account Clearance Bill Impacts

## ONTARIO ENERGY BOARD

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

**AND IN THE MATTER OF** an application by Enbridge Gas Inc., for an order or orders for gas distribution rate changes related to compliance obligations under the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186.

### APPLICATION

1. Enbridge Gas Inc. (Enbridge Gas), the Applicant, was formed by the amalgamation of Enbridge Gas Distribution Inc. and Union Gas Limited on January 1, 2019 pursuant to the *Ontario Business Corporations Act*, R.S.O. 1990, c. B. 16. Enbridge Gas carries on the business of distributing, transmitting and storing natural gas within Ontario.
2. On June 21, 2018, the *Budget Implementation Act, 2018, No. 1* received Royal Assent. Included in Part V is the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186 (GGPPA). Under the GGPPA, a federal carbon pricing program (FCPP) applies in whole or in part to any province or territory that requested it or that did not have an equivalent carbon pricing system in place by January 1, 2019. On October 23, 2018, the federal government confirmed that the GGPPA would apply to Ontario.
3. Provinces or territories can submit their own carbon pricing systems to the federal government for approval, and if approved, are not subject to Part 1 and/or Part 2 of the GGPPA.
4. On March 29, 2021, the federal government announced that effective January 1, 2022, Ontario's carbon pricing system for industrial emitters, known as the Ontario Emissions Performance Standards program (EPS), will replace the federal Output-Based Pricing System (OBPS) in Ontario. The GGPPA was amended on September 1, 2021, to

remove Ontario from Part 2 of Schedule 1 of the GGPPA, enabling the EPS to take effect in Ontario as of January 1, 2022.

5. In Ontario, the FCPP is composed of two elements: (i) a charge on fossil fuels (the Federal Carbon Charge) imposed on distributors, importers and producers effective April 1, 2019, and increasing each year on April 1; and (ii) an EPS for prescribed industrial facilities effective January 1, 2022.
6. Enbridge Gas's operations as a natural gas utility in Ontario fall under the purview of the GGPPA and EPS Regulation, which will result in the following costs being incurred that are tracked through OEB-approved deferral and variance accounts:
  - a. Incremental bad debt costs;<sup>1</sup>
  - b. Customer-related Federal Carbon Charge costs for volumes delivered by Enbridge Gas to its residential, commercial and industrial customers who are not covered under the EPS; and
  - c. Facility-related costs (Facility Carbon Charge) arising from Enbridge Gas's facilities and operation of its gas distribution system.
7. Enbridge Gas hereby applies to the OEB, pursuant to the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B (the Act), for:
  - a. an order or orders allowing it to charge customers a Federal Carbon Charge on a volumetric basis, in the amount of the Federal Carbon Charge required to be paid by Enbridge Gas pursuant to the GGPPA, effective April 1, 2024;
  - b. an order or orders approving or fixing just and reasonable rates for all Enbridge Gas rate zones (EGD, Union Northeast, Union Northwest and Union South),<sup>2</sup> effective April 1, 2024, to allow Enbridge Gas to recover

---

<sup>1</sup> Refer to Exhibit C, Tab 1, Schedule 1 for more information on the incremental bad debt costs.

<sup>2</sup> Collectively, the Union Northeast, Union Northwest and Union South rate zones are referred to as the "Union rate zones".

other costs (including Facility Carbon Charge costs) incurred in compliance with the GGPPA and EPS Regulation;

- c. an order or orders approving the 2022 balances for the FCPP-related deferral and variance accounts for all Enbridge Gas rate zones, as set out in Exhibit C and for an order to dispose of those balances, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs), as early as the April 1, 2024 QRAM.<sup>3</sup>

8. Enbridge Gas further applies to the OEB for all necessary orders and directions concerning pre-hearing and hearing procedures for the determination of this application.
9. This application is supported by written evidence that has been filed with this application and may be amended from time to time as circumstances may require.
10. The persons affected by this application are the customers resident or located in the municipalities, police villages, Indigenous communities and Métis organizations served by Enbridge Gas, together with those to whom Enbridge Gas sells gas, or on whose behalf Enbridge Gas distributes, transmits or stores gas. It is impractical to set out in this application the names and addresses of such persons because they are too numerous.
11. Enbridge Gas requests that the OEB's review of this application proceed by way of written hearing in English.
12. Enbridge Gas requests that all documents relating to this application and its supporting evidence, including the responsive comments of any interested party, be served on Enbridge Gas and its counsel as follows:

---

<sup>3</sup> Refer to Exhibit C, Tab 1, Schedule 1 for more information on the proposal to defer disposition of the CCCVAs.



The Applicant:

Attention: Anton Kacicnik  
Manager Regulatory Applications  
Regulatory Affairs

Address: Enbridge Gas Inc.  
500 Consumers Road  
North York, Ontario  
M2J 1P8

Telephone: (416) 495-6087  
Email: [anton.kacicnik@enbridge.com](mailto:anton.kacicnik@enbridge.com)  
[EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)

The Applicant's Counsel:

Attention: Tania Persad  
Associate General Counsel, Regulatory Law

Address: Enbridge Gas Inc.  
500 Consumers Road  
North York, Ontario  
M2J 1P8

Telephone: (416) 495-5891  
Fax: (416) 495-5994  
Email: [tania.persad@enbridge.com](mailto:tania.persad@enbridge.com)

-and-

Attention: Guri Pannu  
Senior Legal Counsel

Address: Enbridge Gas Inc.  
500 Consumers Road  
North York, Ontario  
M2J 1P8

Telephone: (416) 758-4761  
Fax: (416) 495-5994  
Email: [guri.pannu@enbridge.com](mailto:guri.pannu@enbridge.com)

Dated: September 28, 2023

**Enbridge Gas Inc.**

*(Original Signed)*

---

Anton Kacicnik  
Manager Regulatory Applications  
Regulatory Affairs

## GLOSSARY OF ACRONYMS AND DEFINED TERMS

This glossary is intended to serve as a reference for the benefit of readers in their overall understanding of the terminology used in Enbridge Gas's Application. More detailed definitions may apply to specific terms when used in the context of this Application.

**2019 Application** – Enbridge Gas's 2019 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2018-0205).

**2020 Application** – Enbridge Gas's 2020 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2019-0247).

**2021 Application** – Enbridge Gas's 2021 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2020-0212).

**2022 Application** – Enbridge Gas's 2022 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2021-0209).

**2023 Application** – Enbridge Gas's 2023 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2022-0194).

**BEI** – Baseline Emissions Intensity

**CCBDDA** – Carbon Charges Bad Debt Deferral Account

**CCCVA** – Customer Carbon Charge - Variance Account

**CO<sub>2</sub>** – Carbon dioxide.

**CO<sub>2e</sub>** – Carbon dioxide equivalent.

**Company Use** – Volumes of natural gas consumed in the operation of Enbridge Gas’s facilities including distribution buildings, boilers/line heaters, and NGV fleet volumes (which are subject to the Federal Carbon Charge under Part 1 of the GGPPA).

**Covered Facility** – An entity registered under the EPS and therefore exempt from the Federal Carbon Charge for volumes of fuel delivered by Enbridge Gas. Covered Facilities are classified as mandatory or voluntary based on annual emissions. Covered Facilities are not exempt from Enbridge Gas’s Facility Carbon Charges or administration-related costs.

**CRA** – Canada Revenue Agency.

**Customer Volumes** – Distribution volumes delivered by Enbridge Gas in Ontario, except for volumes delivered to customers that hold an Exemption Certificate.

**Customer-Related Obligations** – The obligations under the GGPPA related to GHG emissions associated with the natural gas delivered by Enbridge Gas, other than to Covered Facilities.

**DCQ** – Daily Contract Quantity.

**Distributor** – An entity that imports or delivers marketable and non-marketable natural gas, and/or that measures consumption of marketable natural gas and is required to register as a Distributor under the GGPPA.<sup>1</sup>

**DSM** – Demand Side Management.

**ECCC** – Environment and Climate Change Canada.

**EITE** – Energy Intensive and Trade Exposed.

---

<sup>1</sup> The GGPPA, s.55. <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

**EPS** – Ontario Emissions Performance Standards program; effective January 1, 2022, the EPS replaced the OBPS for Covered Facilities. These facilities will have a compliance obligation based on the portion of its emissions that exceed the annual emissions limit.

**EPS Regulation** – The *Greenhouse Gas Emissions Performance Standards* made effective July 4, 2019 under the *Environmental Protection Act*, R.S.O. 1990, c. E. 19, as they may be amended from time to time.<sup>2</sup>

**EPS Volumes** – Volumes of natural gas consumed in the operation of Enbridge Gas’s transmission and storage compressor facilities (which are subject to the EPS as Enbridge Gas’s transmission and storage system is a “covered facility” under the EPS Regulation effective January 1, 2022).

**EPUs** – Emissions Performance Units issued by the provincial government, under the EPS, to facilities that achieve annual emissions volumes below their annual PS. Each EPU represents one tonne of CO<sub>2</sub>e, can be banked for future use against emissions or traded, has a useful life of five years from the period following the year for which the credit was issued, and will be tracked using a centralized system.

**Exemption Certificate** – A certificate issued by the CRA to eligible entities, exempting the entity from the application of the Federal Carbon Charge.<sup>3</sup>

**Facility Carbon Charge** – The common volumetric charge proposed by Enbridge Gas, for the EGD rate zone and Union rate zones, to recover the costs resulting from the GGPPA and EPS Regulation related to Enbridge Gas’s: (i) Company Use Volumes including distribution buildings, boiler/line heaters and NGV fleet volumes (which are subject to the Federal Carbon Charge under Part 1 of the GGPPA); and, (ii)

---

<sup>2</sup> The EPS, <https://www.ontario.ca/laws/regulation/190241#BK18>

<sup>3</sup> The GGPPA, s.36. <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

transmission and storage compression volumes (which are subject to the EPS as Enbridge Gas's transmission and storage system is listed as an industrial activity in Schedule 2 of the EPS Regulation).

**Facility Volumes** – Composed of: (i) Company Use Volumes including distribution buildings, boilers/line heaters, and NGV fleet volumes; and, (ii) transmission and storage compression volumes.

**FCCVA** – Facility Carbon Charge – Variance Account

**FCPP** – As part of the GGPPA, a federal carbon pricing program (also known as the “Backstop”) applies in any province or territory that requested it or that does not have an equivalent carbon pricing system in place that meets federal carbon pricing requirements.<sup>4</sup> The FCPP is composed of the Federal Carbon Charge and an Emissions Performance Standards (EPS) Program. The EPS Program replaced the federal OBPS effective January 1, 2022.

**Federal Carbon Charge** – As part of the FCPP, a charge applied to fossil fuels imposed on distributors, importers and producers applicable from 2019-2030 and equivalent to \$80/tCO<sub>2</sub>e as of April 1, 2024. This charge applies to volumes delivered by Enbridge Gas to its customers (other than Covered Facilities) and to Enbridge Gas's Company Use Volumes (i.e. distribution buildings, boilers/line heaters and NGV fleet volumes).

**FTE** – Full-Time Equivalents.

---

<sup>4</sup> Government of Canada – Carbon pollution pricing systems across Canada.  
<https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work.html>

**Fuel Charge Regulations** – The *Fuel Charge Regulations*, 2018, c. 12, s. 187, as amended from time to time, is enacted under the GGPPA to further define the application and enforcement of the Federal Carbon Charge.<sup>5</sup>

**GGEADA** – Greenhouse Gas Emissions Administration Deferral Account.

**GGPPA** – The *Greenhouse Gas Pollution Pricing Act*, S.C.2018, c 12, s. 186, as amended from time to time.<sup>6</sup>

**GHG** – Greenhouse Gas as set out in Section 3 the GGPPA.<sup>7</sup>

**ktCO<sub>2e</sub>** – Kilo-tonne of carbon dioxide equivalent.

**Listed Province** – A province or territory covered, in whole or in part under the GGPPA.<sup>8</sup>

**Mandatory Participant** – Entities that emit 50 ktCO<sub>2e</sub> or greater annually, where the primary activity engaged in at the facility is listed as an industrial activity under the EPS Regulation, are required to register under the EPS.

**Marketable Natural Gas** – Natural gas that meets the specifications for pipeline transport and sale for general distribution to the public, as defined by the Fuel Charge Regulations.<sup>9</sup>

**MECP** – Ministry of the Environment, Conservation and Parks.

**MW** – Megawatt.

**MWh** – Megawatt hour.

---

<sup>5</sup> Fuel Charge Regulations, <https://laws.justice.gc.ca/PDF/SOR-2018-12187.pdf>

<sup>6</sup> The GGPPA, <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

<sup>7</sup> Ibid, Schedule 3, Greenhouse Gases, Column 1.

<sup>8</sup> Ibid, Schedule 1.

<sup>9</sup> Fuel Charge Regulations, s.1.1, <https://laws.justice.gc.ca/PDF/SOR-2018-12187.pdf>

**NGV** – Natural gas vehicle.

**Non-Marketable Natural Gas** – Natural gas other than marketable natural gas, as defined by the GGPPA.<sup>10</sup>

**OBPS** – Output-based pricing system; a component of the FCPP applicable in Ontario from January 1, 2019 to December 31, 2021 that applies to certain registered facilities instead of the Federal Carbon Charge. A registered entity had a compliance obligation based on the portion of its emissions that exceed the annual output-based emissions limit.

**OEB** – Ontario Energy Board.

**Offset Credits** – Represent GHG emissions reductions or removal enhancements generated from Canadian voluntary project-based activities that are not subject to carbon pricing and that would not have occurred under business as usual conditions.<sup>11</sup>

**PS** – Performance Standard; a percentage of the baseline emissions intensity applied to the annual facility production to determine the facility's total annual emissions limit under the EPS.

**PDCI** – Parkway Delivery Commitment Incentive.

**QRAM** – Quarterly Rate Adjustment Mechanism.

**RNG** – Renewable Natural Gas; also referred to as *Biomethane* in the GGPPA, means a substance that is derived entirely from biological matter available on a renewable or recurring basis and that is primarily methane.

---

<sup>10</sup> The GGPPA, s.3. <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

<sup>11</sup> <https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work/output-based-pricing-system.html>



**tCO<sub>2e</sub>** – Metric tonne of carbon dioxide equivalent. The unit of measure of GHG emissions. A quantity of GHG, expressed in tonnes, is converted into tCO<sub>2e</sub> by multiplying the quantity by the applicable global warming potential.<sup>12</sup>

**Voluntary Participant** – Entities that emit between 10 ktCO<sub>2e</sub> and 50 ktCO<sub>2e</sub> annually, where the primary activity engaged in at the facility is listed as an industrial activity under the EPS Regulation may voluntarily register to be part of the EPS.

---

<sup>12</sup> The GGPPA, Schedule 3, Column 2. <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

## OVERVIEW

1. The purpose of this evidence is to further outline the application (Application) of Enbridge Gas Inc. (Enbridge Gas) for: (i) approval to charge customers a Federal Carbon Charge on a volumetric basis, in the amount of the Federal Carbon Charge required to be paid by Enbridge Gas pursuant to the Greenhouse Gas Pollution Pricing Act (GGPPA), effective April 1, 2024; (ii) approval of just and reasonable rates for all Enbridge Gas rate zones, effective April 1, 2024, to allow Enbridge Gas to recover other costs (including the Facility Carbon Charge costs) incurred in compliance with the GGPPA and the Greenhouse Gas Emissions Performance Standards Regulation (EPS Regulation); and (iii) approval of 2022 balances for the federal carbon pricing program (FCPP) related deferral and variance accounts, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs) for all Enbridge Gas rate zones, and disposition of the same, effective April 1, 2024.<sup>1</sup>
2. Enbridge Gas’s Application is being submitted at this time to facilitate compliance with the GGPPA, the EPS Regulation, and to allow customers to be charged the 2024 Federal Carbon Charge rate for natural gas in a timely fashion without accruing uncharged amounts, in accordance with the FCPP, beginning April 1, 2024.
3. This exhibit of evidence is organized as follows:
  1. Background
    - 1.1 The Federal Carbon Pricing Program
  2. Enbridge Gas’s Obligations Under the GGPPA and EPS Regulation
    - 2.1 Volumes Subject to Federal Carbon Charge
    - 2.2 Volumes Subject to EPS
    - 2.3 Management of Facility-Related Emissions and Costs

---

<sup>1</sup> Refer to Exhibit C, Tab 1, Schedule 1 for more information on the proposal to defer disposition of the CCCVAs.

3. Bill Impacts
4. Requested Approvals

#### 1. Background

4. On June 21, 2018, the Budget Implementation Act, 2018, No. 1 received Royal Assent. Part V included the GGPPA. The FCPP applies in whole or in part to any province or territory that requested it or that did not have an equivalent carbon pricing system in place by January 1, 2019. On October 23, 2018, the federal government confirmed that the GGPPA would apply to Ontario.
5. On March 29, 2021, the federal government announced that effective January 1, 2022, Ontario's carbon pricing system for industrial emitters, known as the Ontario Emissions Performance Standards program (EPS), will replace the federal Output-Based Pricing System (OBPS). The GGPPA was amended on September 1, 2021 to remove Ontario from Part 2 of Schedule 1 of the GGPPA, enabling the EPS to take effect in Ontario as of January 1, 2022.
6. On September 29, 2021, Enbridge Gas filed its 2022 Federal Carbon Pricing Program application (EB-2021-0209) (2022 Application). To reflect the transition from the federal OBPS to the Ontario EPS program and recognize that Enbridge Gas would be subject to both federal and provincial regulations beginning January 1, 2022, in its 2022 Application, Enbridge Gas proposed to amend the accounting orders by updating the applicable account definitions and account names.<sup>2</sup> The OEB approved the amendments to the wording of the FCPP deferral and variance accounting orders as filed in its Decision and Order on Enbridge Gas's 2022 Application.<sup>3</sup>

---

<sup>2</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p.3.

<sup>3</sup> EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.

7. On October 31, 2022, Enbridge Gas submit its 2024 Rebasing Application which included a proposal to harmonize the established FCPP-related deferral and variance accounts effective January 1, 2024 and to record administrative costs associated with current federal and provincial regulations related to greenhouse gas emissions requirements through 2024 base rates.<sup>4</sup> In the Settlement Proposal, parties agreed on harmonizing the FCPP deferral and variance accounts, on the condition the existing Greenhouse Gas Emissions Administration Deferral Account (GGEADA) be renamed to Carbon Charges Bad Debt Deferral Account (CCBDDA) and the scope of the account be limited to recording bad debt costs associated with carbon charges.<sup>5</sup> The OEB approved the changes to the FCPP deferral and variance accounts, effective January 1, 2024, in its Decision on the Settlement Proposal to Enbridge Gas's 2024 Rebasing Application.<sup>6</sup> Accordingly, starting in 2024, the only FCPP-related administrative costs Enbridge Gas will record in the CCBDDA are bad debt costs.
8. As set out at Exhibit D, Tab 1, Schedule 1, Enbridge Gas is seeking OEB approval to increase the Federal Carbon Charge and Facility Carbon Charge to recover the costs associated with meeting its obligations under the GGPPA and EPS Regulation, on a final basis, effective April 1, 2024. Further, as set out at Exhibit C, Tab 1, Schedule 1 and Exhibit D, Tab 1, Schedule 1, Enbridge Gas proposes to clear the final 2022 balance in its OEB-approved FCPP-related deferral and variance accounts, excluding the small balances in the CCCVAs.<sup>7</sup>

---

<sup>4</sup> EB-2022-0200, 2024 Rebasing Application, October 31, 2022, Exhibit 9, Tab 1, Schedule 1.

<sup>5</sup> EB-2022-0200, 2024 Rebasing Application, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp. 53-55.

<sup>6</sup> EB-2022-0200, Decision on Settlement Proposal, August 17, 2023, p.1.

<sup>7</sup> Refer to Exhibit C, Tab 1, Schedule 1, for more information on the proposal to defer disposition of the CCCVAs.

9. This evidence also includes cost estimates and volume forecasts for 2024 that are meant to be used for informational purposes only. Customers will be charged the Federal Carbon Charge and Facility Carbon Charge based on actual volumes. Enbridge Gas will seek disposition of any variance to forecast for 2024 as well as FCPP-related 2024 bad debt costs through a future application to the OEB.

### 1.1 The Federal Carbon Pricing Program

10. The FCPP is composed of two elements:

- a. A charge on fossil fuels (the Federal Carbon Charge) as a cost per unit of fuel, including natural gas (cubic meters or m<sup>3</sup>), imposed on distributors, importers and producers applicable as of April 1, 2019 under Part 1 of the GGPPA. This charge applies to fuel delivered by Enbridge Gas to its customers and to Enbridge Gas's own fuel use within its distribution system (i.e. its Company Use for distribution buildings, boilers/line heaters and Natural Gas Vehicle (NGV) fleet fuel). Exemptions from the Federal Carbon Charge are explained below.

In December 2020, the federal government released its updated climate plan, "A Healthy Environment and A Healthy Economy", outlining the strategy to reduce greenhouse gas (GHG) emissions which included a proposal to increase the Federal Carbon Charge by \$15/tCO<sub>2</sub>e annually starting in 2023, increasing to \$170/tCO<sub>2</sub>e in 2030.<sup>8</sup> The federal government confirmed this Federal Carbon Charge increase in July 2021.<sup>9</sup>

---

<sup>8</sup> A Healthy Environment and a Healthy Economy, Environment and Climate Change Canada, December 2020, [https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/climate-plan/healthy\\_environment\\_healthy\\_economy\\_plan.pdf](https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/climate-plan/healthy_environment_healthy_economy_plan.pdf)

<sup>9</sup> Update to the Pan-Canadian Approach to Carbon Pollution Pricing 2023-2030, Government of Canada, August 05, 2021, <https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work/carbon-pollution-pricing-federal-benchmark-information/federal-benchmark-2023-2030.html>

Schedule 2 of the GGPPA was amended on April 1, 2023 to include the Federal Carbon Charge rates from 2023 to 2030. In 2024, the Federal Carbon Charge is equivalent to \$80 per tonne of carbon dioxide equivalent (tCO<sub>2e</sub>) or 15.25 ¢/m<sup>3</sup> (see Table 1). The Federal Carbon Charge became effective April 1, 2019 and increases each subsequent year on April 1.

Table 1  
2019 – 2030 Federal Carbon Charge Rates for Marketable Natural Gas<sup>10</sup>

<b>Year</b>	<b>\$/tCO<sub>2e</sub></b>	<b>¢/m<sup>3</sup></b>
2019	\$20	3.91
2020	\$30	5.87
2021	\$40	7.83
2022	\$50	9.79
2023	\$65	12.39
2024	\$80	15.25
2025	\$95	18.11
2026	\$110	20.97
2027	\$125	23.83
2028	\$140	26.69
2029	\$155	29.54
2030	\$170	32.40

- b. Entities that are covered under the Ontario EPS Regulation are exempt from coverage under Part 1 of the GGPPA, “Fuel Charge” and Part 2 of the GGPPA, “Industrial Greenhouse Gas Emissions”. Under the EPS Regulation, the Ontario Ministry of Environment, Conservation and Parks (MECP) established a mandatory emissions threshold for entities identified as being in an Energy Intensive and Trade Exposed (EITE) sector (facilities which have a primary activity listed in Schedule 2 of the EPS Regulation) of 50 ktCO<sub>2e</sub> or more per year and a voluntary emissions threshold of 10 – 50 ktCO<sub>2e</sub> per

---

<sup>10</sup> The GGPPA, Schedule 2 and Schedule 4, <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

year for those entities that choose to voluntarily participate in the EPS. This component of the FCPP became effective January 1, 2022.<sup>11</sup>

The EPS creates a pricing incentive to reduce GHG emissions from EITE industrial facilities while limiting the impacts of carbon pricing on their respective competitiveness. Entities subject to the EPS Regulation are required to apply to the MECP and the Canada Revenue Agency (CRA) for exemption from the Federal Carbon Charge. The exemption certificate issued by the CRA must then be submitted to Enbridge Gas to ensure that the entity is not charged the Federal Carbon Charge on its natural gas bill. Participants in the EPS Program are required to report and manage their own compliance obligations and if their annual emissions are greater than the total annual emissions limit, participants will have the following options to satisfy their compliance obligations:<sup>12</sup>

- (i) Pay the excess emissions charge;<sup>13</sup> or
- (ii) Submit emissions performance units (EPUs) issued by the provincial government.

The EPS currently has no provision for use of offset credits.

13. Any natural gas volumes delivered by Enbridge Gas for the period of January 1, 2024 to March 31, 2024 will continue to be charged the Federal Carbon Charge and

---

<sup>11</sup> On March 29, 2021, the federal government announced that Ontario will transition from the federal OBPS to the Ontario EPS effective January 1, 2022 and on September 1, 2021, the Order Amending Part 2 of Schedule 1 to the GGPPA was published in the Canada Gazette, Part II, removing Ontario from Part 2 of the GGPPA as of January 1, 2022.

<sup>12</sup> MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, December 2022.  
<https://www.ontariocanada.com/registry/showAttachment.do?postingId=28727&attachmentId=41017>

<sup>13</sup> Excess emissions charge is the price per unit in \$/tCO<sub>2e</sub>. For the 2024 compliance period, the excess emissions charge is \$80/tCO<sub>2e</sub>. <https://www.ontario.ca/laws/regulation/190241>

Facility Carbon Charge rates approved by the OEB as part of Enbridge Gas's 2023 Application.

## 2. Enbridge Gas's Obligations Under the GGPPA and EPS Regulation

16. As a natural gas utility in Ontario, a "listed province" in the GGPPA, Enbridge Gas is required to register under Part 1 of the GGPPA with the CRA as a "distributor" for volumes of natural gas delivered to its customers.<sup>14</sup>

17. As a "distributor", Enbridge Gas is required to remit Federal Carbon Charges related to the GGPPA to the Government of Canada monthly.

18. Enbridge Gas is also required to register under the EPS Regulation as a "covered facility" since its transmission and storage operations are covered by an industrial activity listed in Schedule 2 of the EPS Regulation.<sup>15</sup>

19. As a "covered facility" under the EPS Regulation, Enbridge Gas is required to remit payment annually for any excess emissions under the EPS.

20. Enbridge Gas has estimated its 2024 cost of compliance with the GGPPA and EPS Regulation to be approximately \$2,647.47 million: \$1,613.26 million for the EGD rate zone (see Exhibit B, Tab 2 for additional detail) and \$1,034.21 million for the Union rate zones (see Exhibit B, Tab 3 for additional detail). In addition, Enbridge Gas estimates that it will incur 2024 bad debt costs of approximately \$8.80 million based on the forecasted costs recoverable from customers as a result of the GGPPA and EPS Regulation (see Exhibit C, Tab 1, Schedule 1 for additional detail).

---

<sup>14</sup> The GGPPA, s.55 (1). The GGPPA requires registration of distributors of marketable or non marketable natural gas. <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

<sup>15</sup> The EPS, O.Reg. 241/19. <https://www.ontario.ca/laws/regulation/r19241>



## 2.1 Volumes Subject to Federal Carbon Charge

21. Except for customer volumes that are covered under the EPS, or those that are otherwise fully or partially exempt from the Federal Carbon Charge, all distribution volumes delivered by Enbridge Gas in Ontario (Customer Volumes) are covered under Part 1 of the GGPPA and are subject to the Federal Carbon Charge.<sup>16</sup>

22. Under the GGPPA Enbridge Gas is required, on a monthly basis, to:<sup>17</sup>

- calculate and report to the CRA the volume of fuel consumed which is covered under Part 1 of the GGPPA, including Enbridge Gas's own use within its distribution system (i.e. distribution buildings, boilers/line heaters and NGV fleet volumes); and
- remit the amount of the Federal Carbon Charge in respect of the monthly volume that has been calculated.

### Forecast Customer Volumes and Costs

23. As set out in Table 1, Enbridge Gas is required to remit the 2024 Federal Carbon Charge rate of 15.25 ¢/m<sup>3</sup> of natural gas consumed for applicable customers from April 1, 2024 to March 31, 2025. As outlined at Exhibit D, Tab 1, Schedule 1 and consistent with Enbridge Gas's treatment of 2019 to 2023 FCPP-related charges, Enbridge Gas will present these charges as a separate line item on customers' bills. Enbridge Gas's forecast cost associated with Customer Volumes for the period of April 1, 2024 to March 31, 2025 is \$2,640.33 million: \$1,612.20 million for the EGD rate zone and \$1,028.14 million for the Union rate zones (please see Exhibit B for

---

<sup>16</sup> To calculate Enbridge Gas's 2024 customer volume forecast at Exhibit B, Tab 2, Schedule 2, and at Exhibit B, Tab 3, Schedule 2, Enbridge Gas excluded customers who have provided Enbridge Gas with an exemption certificate, in accordance with Section 17(2) of the GGPPA. This includes downstream distributors, entities covered under the EPS, and customers who use natural gas in a non-covered activity. RNG volumes, hydrogen volumes and 80% of volumes for eligible greenhouses are also excluded.

<sup>17</sup> The GGPPA, s.68 (2b), s.71 (3). <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>

additional detail on costs associated with Customer Volumes for the period of April 1, 2024 to March 31, 2025).

24. These cost estimates are subject to change based on actual distribution volumes and are meant to be used for informational purposes only. Customers will be charged the Federal Carbon Charge rate monthly based on actual billed volumes.
25. Customers that hold an Exemption Certificate must provide a copy to Enbridge Gas no later than two weeks in advance of the first day of the month in which they wish to have their consumption volumes exempted from the Federal Carbon Charge. Similarly, if a customer is no longer eligible to hold an Exemption Certificate, they must provide notice to Enbridge Gas of that fact, as soon as the facility ceases to be eligible for exemption.

*Forecast Company Use Volumes and Costs*

26. As set out in Table 1, Enbridge Gas is required to remit the 2024 Federal Carbon Charge rate of 15.25 ¢/m<sup>3</sup> for natural gas consumed in the operation of Enbridge Gas's facilities which are not covered by the EPS (i.e. distribution buildings, boilers/line heaters and NGV fleet volumes) ("Company Use Volumes"). The costs associated with Company Use Volumes will be recovered from customers as part of the Facility Carbon Charge, as detailed at Exhibit D, Tab 1, Schedule 1, included in delivery or transportation charges on customers' bills. Enbridge Gas's forecast cost associated with Company Use Volumes for the period of April 1, 2024 to March 31, 2025 is approximately \$2.17 million: \$0.63 million for the EGD rate zone and \$1.54 million for the Union rate zones (please see Exhibit B for additional detail on costs associated with Company Use Volumes for the period of April 1, 2024 to March 31, 2025).

27. The forecast Company Use Volumes and associated Facility Carbon Charge cost estimate are subject to change based on actual Facility Volumes. Any cost impacts due to the variance between forecast and actual Facility Volumes will be recorded in the Facility Carbon Charge – Variance Account for future disposition.

## 2.2 Volumes Subject to EPS

28. Transmitting natural gas is a covered “industrial activity” under the EPS and includes installations and equipment such as compressor stations, storage installations, and compressor units that have a common owner/operator within a province.<sup>18</sup> For Enbridge Gas, this includes fuel used in transmission and storage compressor facilities (EPS Volumes).

29. Under the EPS, Enbridge Gas is required, on an annual basis, to:

- calculate and report to the Ontario MECP, Enbridge Gas’s covered emissions and total annual emissions limit for each compliance period; and
- provide compensation for, or otherwise obtain EPU, to cover any excess emissions by the applicable deadline.

30. Owners and operators of EPS-covered facilities have a compliance obligation for the portion of the emissions from those facilities that exceed their total annual emissions limit. Under the EPS, a covered facility’s total annual emissions limit is calculated based on the applicable Performance Standard (PS) and its associated annual production.<sup>19</sup> As outlined by the MECP, the PS for facilities transmitting natural gas is 76.1% of the production-weighted facility baseline emissions intensity in 2024.<sup>20</sup>

---

<sup>18</sup> The EPS, O.Reg. 241/19. <https://www.ontario.ca/laws/regulation/r19241>

<sup>19</sup> MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, December 2022. [https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL\\_December%202022%20\(EN\).pdf](https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_December%202022%20(EN).pdf)

<sup>20</sup> Ibid, Table 4.2, p. 36.

The costs associated with EPS Volumes will be recovered from customers as part of the Facility Carbon Charge, as detailed at Exhibit D, Tab 1, Schedule 1, included in delivery or transportation charges on customers' bills. Enbridge Gas's forecast 2024 (January 1, 2024 to December 31, 2024) regulated cost associated with EPS Volumes is \$4.97 million: \$0.43 million for the EGD rate zone and \$4.54 million for the Union rate zones (please see Exhibit B for additional detail on costs associated with EPS Volumes for the period of January 1, 2024 to December 31, 2024).

### 2.3 Management of Facility-Related Emissions and Costs

31. Consistent with Enbridge Gas's commitment in the 2021 Application "...to identify, track and report on emission reduction opportunities using criteria that effectively balance management of its compliance obligations under the FCPP, estimated capital costs, safety and operational reliability,"<sup>21</sup> and the OEB's Decision and Order on the 2022 Application that "Enbridge Gas's next FCPP application set out in a comprehensive fashion the management of Enbridge's own obligations that identifies its approaches towards achieving efficiencies and reduction of carbon emission related costs to its customers", this section of evidence contains details on the potential options for reducing Enbridge Gas's facility-related emissions and associated costs.<sup>22</sup> Facility-related emissions and associated costs can be reduced through the reduction of either Company Use Volumes or EPS Volumes, or, in the case of EPS emissions, through the use of lower cost compliance options.

#### Facility-Related Volume Reductions

32. To support the achievement of federal, provincial and Enbridge Inc. GHG emission targets, and to support the reduction of facility-related emissions costs, Enbridge Gas continues to update its emission reduction strategy for emissions resulting directly from Enbridge Gas's operations. This strategy covers emissions from

---

<sup>21</sup> EB-2020-0212, EGI 2021 FCPP Application, September 30, 2020, Exhibit A, p. 14.

<sup>22</sup> EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.

combustion of fuels in Company-operated buildings, equipment and vehicles, and methane emissions from venting and leaked natural gas.

33. Enbridge Gas's facility-related emissions covered under the GGPPA and EPS only include stationary combustion and flaring emissions, and therefore only opportunities which address these emissions sources will be further discussed in this evidence. Opportunities to reduce GHG emissions from fugitive and vented sources were addressed in Enbridge Gas's 2024 Rebasing Application.<sup>23</sup>

34. In order to prioritize emission reduction opportunities, Enbridge Gas has classified GHG reduction opportunities as follows:

- a) Business as Usual (BAU) Opportunities – planned emissions reductions included in the Asset Management Plan (AMP), including improved operating practices, modernization, and current and emerging policies and regulations. Although these opportunities are part of Enbridge Gas's GHG Reduction Strategy work, they are being driven by the Company's standard operational maintenance program; and
- b) High Impact/Low Risk Opportunities – emissions reductions opportunities that are not already included in the AMP.

35. Opportunities identified to date with the potential to reduce EPS volumes are listed below in Table 2 and Table 3. Table 2 provides a summary of the opportunities that Enbridge Gas is implementing to reduce emissions and facility-related costs. Table 3 provides a summary of additional opportunities to reduce emissions and facility-related costs that Enbridge Gas has identified, however are not considered feasible at this point in time.

---

<sup>23</sup> EB-2022-0200, 2024 Rebasing Application, October 31, 2022, Exhibit 1, Tab 10, Schedule 8, Table 1 & Table 2.

36. The cost per tonne of GHG emissions shown for each opportunity in Table 2 and Table 3 was calculated using a Discounted Cash Flow analysis (cost represented by a positive \$/tCO<sub>2</sub>e figure and savings represented by a negative \$/tCO<sub>2</sub>e figure). Cash outflows include incremental capital costs of each opportunity. Cash inflows include resulting natural gas savings, avoided carbon charges, any other incremental O&M costs or savings, income tax impacts and any operating costs or savings resulting from the opportunity. The net present value (NPV) of cash inflows and outflows is divided by the total estimated emissions avoided over the life of the project to determine the \$/tCO<sub>2</sub>e.

Table 2  
 Facility-Related Emission Reduction Project Summary – In-Progress Opportunities

Opportunity	Total Estimated Capital Cost (\$millions)	Estimated Emissions Reductions – 2022 (tCO <sub>2</sub> e)	Estimated EPS Cost Impact - 2022 (\$) <sup>24</sup>	Forecasted Emissions Reductions – 2024 (tCO <sub>2</sub> e)	Forecasted Project Emissions Reductions (tCO <sub>2</sub> e) <sup>25</sup>	Cost per Tonne of GHG Emissions (\$/tCO <sub>2</sub> e)
1 Storage and Transmission Operations (STO) Online Monitoring	0.05	960	-48,000	1,100 <sup>26</sup>	1,100	-32
2 Air Filter Replacements for Turbines	0 <sup>27</sup>	0 <sup>28</sup>	0	200	1,500	-47

37. Implementation of the STO online monitoring opportunity was completed in 2022, with the final unit being brought online.

<sup>24</sup> Estimated based on estimated emissions reductions and excess emissions charge for 2022.

<sup>25</sup> Forecasted total annual project emissions reductions once project is fully implemented.

<sup>26</sup> No additional units to be brought online post 2022, and therefore forecasted emissions reductions for 2024 will be the same as the forecasted project emission reductions.

<sup>27</sup> Initial O&M costs for the air filter replacement program are estimated to be \$10,000 but once the program is fully implemented, it is estimated that there will be an O&M savings of approximately \$150,000/year.

<sup>28</sup> There were no filter upgrades in 2022. The only filter changes in 2022 were direct replacements on units that did not require filter upgrades.

38. The air filter replacements for turbines opportunity is ongoing, with higher efficiency filters being installed on applicable units at the next filter change opportunity.

39. The online monitoring and air filter replacements for turbines opportunities were driven by Enbridge Gas's standard operational maintenance program and therefore Enbridge Gas is not seeking cost recovery for these opportunities through this Application.

Table 3  
 Facility-Related Emission Reduction Project Summary – Currently Not Feasible Opportunities

	Opportunity	Total Estimated Capital Cost (\$millions)	Forecasted Project Emissions Reductions (tCO <sub>2</sub> e) <sup>29</sup>	Cost per Tonne of GHG Emissions (\$/tCO <sub>2</sub> e)
1	Electric Drive Compressors – Dawn Plant C Replacment	70	16,000	105
2	Electric Drive Compressors – Parkway	140	12,000	199
3	Re-wheeling Turbines	17	3,100	191
4	Compressor Fuel Switch to RNG	0 <sup>30</sup>	275,000	178
5	Own Use Gas Fuel Switch to RNG Blend (5%)	0 <sup>31</sup>	1,300	203

40. Re-wheeling Turbines, Fuel Switching to RNG and Electrification opportunities are currently not feasible due to the high costs per tonne as compared to the excess emissions charge.

---

<sup>29</sup> Forecasted total annual project emissions reductions once project is fully implemented.

<sup>30</sup> It is estimated that the incremental O&M costs will be approximately \$151 million/year once fully implemented.

<sup>31</sup> It is estimated that the incremental O&M costs will be approximately \$0.7 million/year once fully implemented.

41. The Compression Modernization Strategy in the AMP is a long-term plan to replace identified compression. Under this project several factors are being considered in the evaluation of alternatives, including meeting the operating requirements for the storage and transmission systems, reliability, environmental compliance, and GHG emissions reduction strategy. Electrification will be considered as an alternative for both Dawn Plant C and Parkway A engine replacements. Ongoing modernization of Enbridge Gas's compressor fleet is expected to reduce EPS emissions in the long-term.
42. As part of Enbridge Gas's GHG emissions reduction strategy, identified opportunities will be reviewed on an annual basis, including revisiting any previous assumptions, project costs and the cost of carbon. Part of the process is to continue to identify new opportunities, and further assess those opportunities that have been previously identified.
43. Actual GHG emissions and reductions in EPS costs resulting from these opportunities will be reflected in Enbridge Gas's future FCPP applications for clearance of FCPP-related deferral and variance accounts.

#### EPS Compliance Cost Reductions

44. Enbridge Gas has an alternative compliance option to satisfy its annual EPS compliance obligation aside from paying the excess emissions charge; the purchase of EPU from other EPS participants. The EPS Regulation does not allow for the use of Offset Credits as a viable compliance option.
45. Enbridge Gas has made an effort to procure EPUs for use towards its 2022 EPS compliance obligation, but to date no opportunities have been found. With 2022 being the first compliance period under the EPS program, the EPU market is nascent and the availability of EPUs is currently difficult to determine. The EPS Regulations allow an entity to hold EPUs in their account for a period of up to five



years for use towards a future compliance period or to sell into the market at a higher carbon price at a future date, which will likely reduce the supply of EPU's sold into the market, especially for this first compliance year.<sup>32</sup>

46. Additionally, Enbridge Gas understands that the MECF will disctriubte EPU's on or before November 1, 2023, which is only one month before the December 15, 2023 compliance deadline. The limited timelines to procure and retire EPU's for use towards the Company's 2022 compliance period are anticipated to make it difficult to execute a transaction later in the year.

47. Due to the difficulty in finding EPU's, Enbridge Gas anticipates satisfying the 2022 EPS compliance obligation by paying the excess emissions charge. If Enbridge Gas is able to procure EPU's at a lower price than the excess emissions charge in the timeperiod between the submission of this Application and the 2022 compliance deadline of December 15, 2023, the cost savings will be recorded in the FCCVAs.

48. For Enbridge Gas's 2024 EPS compliance obligation, the availability and pricing of EPU's will be reviewed to determine if they present a viable means of reducing compliance costs. If Enbridge Gas procures EPU's at a lower price than the excess emissions charge, the difference between these two costs will be recorded in the FCCVA<sup>33</sup> and Enbridge Gas will seek to dispose of those amounts through a future FCPP application.<sup>34</sup>

---

<sup>32</sup> EPU's can be banked for the duration of their useful life which is five years after the compliance period for which the credit was issued.

<sup>33</sup> As of January 1, 2024, the existing FCPP deferral and variance accounts will be harmonized. Please refer to Exhibit C, Tab 1, Schedule 1 for more information.

<sup>34</sup> EB-2019-0247, Exhibit I.STAFF.8 b) and c), June 18, 2020; EB-2019-0247, Enbridge Gas Reply Argument, July 16, 2020, p. 12.

### 3. Bill Impacts

49. The bill impact of the 2024 carbon charges for a typical residential customer with annual consumption of 2,400 m<sup>3</sup> is \$366.35 per year in the EGD rate zone, which is an increase of \$68.79 per year over 2023. The bill impact of the 2024 carbon charges for a typical residential customer with annual consumption of 2,200 m<sup>3</sup> is \$335.83 per year in the Union rate zones, which is an increase of \$62.91 per year over 2023.
50. The bill impact of the proposed 2022 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,400 m<sup>3</sup> is \$1.12 in the EGD rate zone. The bill impact of the proposed 2022 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,200 m<sup>3</sup> is \$0.81 in the Union South rate zone and \$1.06 in the Union North rate zone.

### 4. Requested Approvals

51. As the costs to comply with the GGPPA and EPS Regulation in 2024 form part of Enbridge Gas's ongoing operating costs as a utility, and consistent with Enbridge Gas's 2023 Application, Enbridge Gas proposes to continue to treat all prudently incurred costs of compliance with the GGPPA and EPS Regulation as a pass-through to customers (Y Factor).
52. Through this Application and by February 8, 2024, Enbridge Gas is seeking:
- a) OEB approval of rates to be applied to customer bills beginning April 1, 2024. Following the issuance of the OEB's Decision and Order for this Application, Enbridge Gas intends to reflect 2024 rate increases associated with the Federal Carbon Charge and other costs (including the Facility Carbon Charge costs) incurred in compliance with the GGPPA and EPS Regulation as early as part of its April 1, 2024 QRAM application.

- b) OEB approval to dispose of the 2022 balances recorded in Enbridge Gas's FCPP-related deferral and variance accounts, excluding the CCCVAs, effective April 1, 2024. Following the issuance of the OEB's Decision and Order for this Application, Enbridge Gas intends to dispose of these balances as a one-time adjustment as early as part of the April 1, 2024 QRAM.<sup>35</sup>

---

<sup>35</sup> Refer to Exhibit C, Tab 1, Schedule 1, for more information on the proposal to defer disposition of the CCCVAs.

## FEDERAL CARBON CHARGE IMPACT ON CUSTOMER CONSUMPTION

1. Pursuant to the OEB's request for greater understanding of the impacts of the Federal Carbon Charge on patterns of gas consumption by Enbridge Gas customers, as requested through the 2023 Application, Enbridge Gas is providing, to the best of its ability, an analysis of the Federal Carbon Charge on customer consumption patterns since implementation in 2019.<sup>1</sup> The analysis below compares the average use trend for residential and non-residential customers pre and post-Federal Carbon Charge implementation.
2. As of 2022, Enbridge Gas served over 3.8 million customers comprising of approximately 3.5 million residential and approximately 300 thousand non-residential customers.

### 1. Residential Average Use

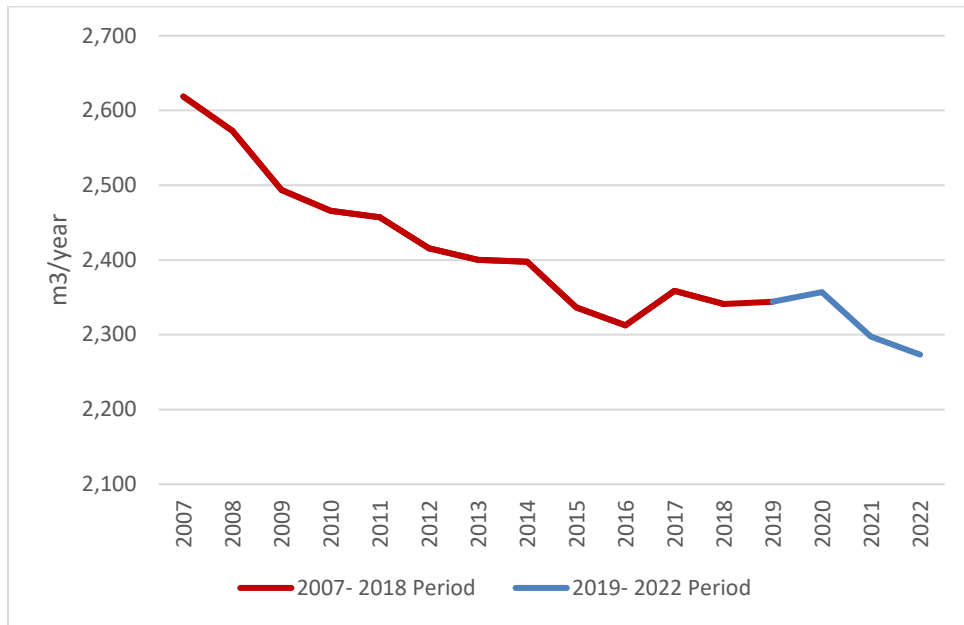
3. Over the past few decades, several factors have contributed to a gradual decrease in residential natural gas usage. These include improved housing construction and increased efficiency in space-heating equipment and other natural gas appliances (efficiency improvements through building code changes), an increase in natural gas prices, and customer behavior.
4. Figure 1 below shows a general downward trend in Enbridge Gas's residential average use over the past fifteen years. The average annual decline in residential average use was approximately 1.0% between 2007 to 2018. Since the implementation of the Federal Carbon Charge in 2019, Enbridge Gas' residential customers have continued to experience an average annual decline of approximately 1.0% in average use, which is aligned with the historical trend experienced from 2007 to 2018. Therefore, the introduction of the Federal Carbon

---

<sup>1</sup> EB-2022-0194, Decision and Order, February 9, 2023, p. 7.

Charge in 2019 has not (to this point) had a distinct (or a readily identifiable/recognizable) impact on the trend in residential average use decline.

Figure 1  
Enbridge Gas Residential Average Use<sup>2</sup>



5. Although the Federal Carbon Charge is one of various contributing factors affecting average use, the Company is not able to exclusively identify the specific impact, or contribution, of the Federal Carbon Charge to the average use versus other contributing factors. To date, residential average use has been following an established trend and no indication of a shift from the historical trend has been observed.

## 2. Non-Residential Average Use

6. Non-residential average use is largely influenced by the economy. During periods of economic growth, increases in demand for goods and services from the commercial and industrial sectors tend to increase natural gas consumption. “Economy-related

---

<sup>2</sup> Weather Normalized at 2024 Proposed Heating Degree Days.

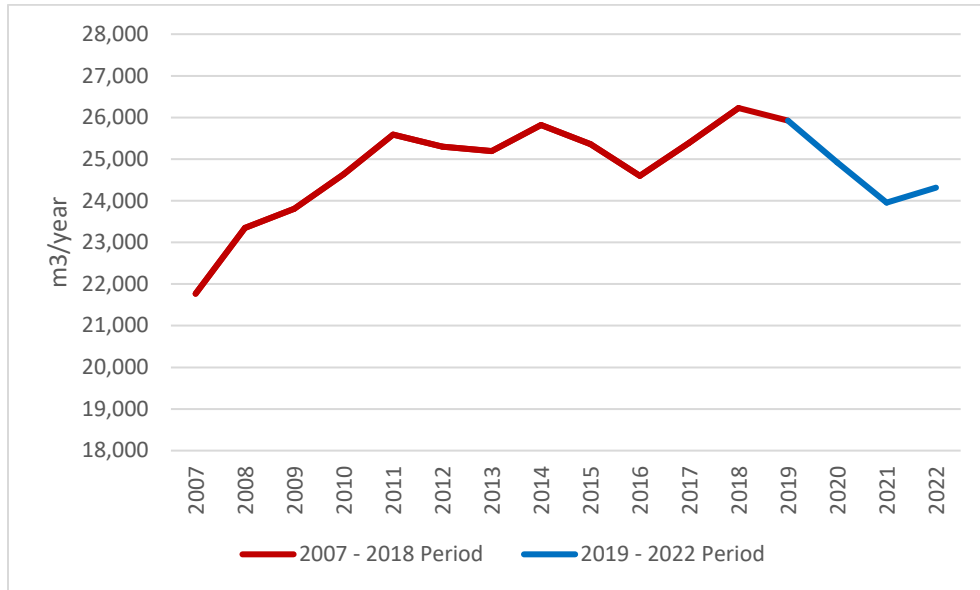
increases in consumption can be significant in the industrial sector since this sector uses natural gas as a fuel and a feedstock for making many products such as fertilizer and pharmaceuticals.”<sup>3</sup> However, like residential average use, other factors including efficiency increases, natural gas prices, and customer behavior also have an impact on non-residential average use.

7. Figure 2 below shows a general trend in Enbridge Gas’s non-residential average use over the last fifteen years. The non-residential average use had an average annual increase of 1.7% between 2007 to 2018. Since 2011, non-residential average use has been more stable. The average annual increase from 2011 to 2018 was 0.4%. In the period of 2019-2022, after the implementation of the Federal Carbon Charge in 2019, Enbridge Gas exhibited an average annual decline of 2.1% in non-residential average use.
8. As stated in paragraph 5 above, the Company is not able to exclusively identify the specific impact, or contribution, of the Federal Carbon Charge to the average use versus other contributing factors. Although the non-residential average use trend for the period of 2019-2022 followed a different trend than historically experienced, Enbridge Gas believes that during this period, the decline in non-residential average use was influenced by the economic conditions under the COVID-19 pandemic (lower GDP growth, business closures, and high commercial vacancy rates).

---

<sup>3</sup> U.S. Energy Information Administration. (2021, October, 5). Natural gas explained, Factors affecting natural gas prices. <https://www.eia.gov/energyexplained/natural-gas/factors-affecting-natural-gas-prices.php>

Figure 2  
Enbridge Gas Non-Residential Average Use<sup>4</sup>



9. Considering the Federal Carbon Charge will continue to increase in the future, Enbridge Gas will continue to monitor the impacts of the Federal Carbon Charge on Enbridge Gas customers' consumption patterns and will continue to report its observations/findings to the OEB.

---

<sup>4</sup> Weather Normalized at 2024 Proposed Heating Degree Days.

## FORECASTS - OVERVIEW

1. The purpose of this exhibit is to provide Enbridge Gas's forecast of volumes and the associated forecasted costs of complying with the GGPPA and EPS Regulation for each of the EGD and Union rate zones.<sup>1</sup>
2. This exhibit of evidence is organized as follows:
  1. Exhibit B, Tab 2, Schedule 1: Forecasts - EGD Rate Zone
  2. Exhibit B, Tab 3, Schedule 1: Forecasts - Union Rate Zones

### 1. Forecast Period

3. In this Application, Enbridge Gas has forecast volumes and associated costs in alignment with the annual effective date of changes to the Federal Carbon Charge and the EPS:
  - For volumes subject to the Federal Carbon Charge (including customer-related and facility-related volumes) – April 1, 2024, to March 31, 2025; and
  - For volumes subject to the EPS (including facility-related volumes) – January 1, 2024, to December 31, 2024.
4. Natural gas volumes delivered by Enbridge Gas for the period of January 1, 2024, to March 31, 2024, will continue to be charged the Federal Carbon Charge and Facility Carbon Charge rates approved by the OEB as part of Enbridge Gas's 2023 Application.

### 2. Forecast 2024 Total Volume and Carbon Cost

5. Enbridge Gas's total 2024 regulated volume forecast subject to the GGPPA and the EPS is 17,458,454 10<sup>3</sup>m<sup>3</sup>.<sup>2</sup> This results in an associated forecast 2024 total cost of

---

<sup>1</sup> Forecast administration costs of complying with the GGPPA and EPS Regulation are detailed at Exhibit C, Tab 1, Schedule 1.

<sup>2</sup> Total of regulated customer and facility-related volumes for the EGD rate zone and Union rate zones. Calculated as: Exhibit B, Tab 2, Schedule 2, Col. 3, Line 13 + Exhibit B, Tab 2, Schedule 3, Col. 1, Line 6 + Exhibit B, Tab 3, Schedule 2, Col. 3, Line 16 + Exhibit B, Tab 3, Schedule 3, Col. 1, Line 6.



\$2,647.47 million. The details of this volume forecast, and associated cost are included at Exhibit B, Tab 2, Schedule 1 for the EGD rate zone and at Exhibit B, Tab 3, Schedule 1 for the Union rate zones.

### 3. Forecast 2024 Customer Volume and Federal Carbon Charge Cost

6. Enbridge Gas's total 2024 Customer Volume forecast subject to the Federal Carbon Charge is 17,313,661 10<sup>3</sup>m<sup>3</sup> for the period of April 1, 2024, to March 31, 2025.<sup>3</sup> This results in an associated forecast 2024 Federal Carbon Charge cost of \$2,640.33 million. This cost estimate is subject to change based on actual distribution volumes and is meant to be used for informational purposes only. Customers will be charged the Federal Carbon Charge rate monthly based on actual billed volumes.
7. To estimate the Customer Volume forecast, Enbridge Gas excluded customer volumes exempt from Part 1 of the GGPPA, including customer volumes qualifying for exemption for non-covered activities,<sup>4</sup> volumes of renewable natural gas (RNG),<sup>5</sup> volumes of hydrogen,<sup>6</sup> and EPS registered customer volumes with emissions exceeding 10 ktCO<sub>2e</sub>.<sup>7</sup> Enbridge Gas also excluded volumes delivered to downstream distributors, including those distributors that are out of province, which are also exempt from Part 1 of the GGPPA. Further, Enbridge Gas excluded 80% of the volumes delivered to commercial greenhouse operators.<sup>8</sup>

---

<sup>3</sup> Calculated as: Exhibit B, Tab 2, Schedule 2, Col. 3, Line 13 + Exhibit B, Tab 3, Schedule 2, Col. 3, Line 16.

<sup>4</sup> Under the GGPPA, entities that use natural gas which is not put into a fuel system that produces heat or energy and those entities that use natural gas: (i) as a raw material in an industrial process that produces another fuel, substance, material or thing; or (ii) as a solvent or diluent in the production or transport of crude bitumen or another substance, material or thing, meet the definition of a non-covered activity and may be exempt from Part 1 of the GGPPA.

<sup>5</sup> Under the GGPPA, biomethane, also known as RNG, is exempt from the Federal Carbon Charge.

<sup>6</sup> On March 27, 2023, the Fuel Charge Regulations, enacted under the GGPPA, were amended to confirm that hydrogen blended with natural gas is exempt from the Federal Carbon Charge, retroactive to August 2022, <https://www.gazette.gc.ca/rp-pr/p2/2023/2023-04-12/html/sor-dors62-eng.html>

<sup>7</sup> The 2024 Customer Volume forecast excludes customer volumes from mandatory and voluntary participants of the EPS, that are exempt from the Federal Carbon Charge under Part 1 of the GGPPA.

<sup>8</sup> Under the GGPPA, greenhouse operators receive partial relief of 80% of the Federal Carbon Charge for natural gas used in the operation of a commercial greenhouse.

8. Customers exempt from Part 1 of the GGPPA who have provided Enbridge Gas their Exemption Certificate, which is issued to the customer upon registration with the CRA, will continue to be exempted unless they otherwise notify Enbridge Gas that they are no longer eligible for exemption. Enbridge Gas will also exempt any additional eligible customers who submit an Exemption Certificate in the future. For those customers covered under the EPS or undertaking non-covered activities, Enbridge Gas will exempt the customer on the date provided by the CRA on the customer's CRA-issued registration confirmation letter. For customers operating commercial greenhouses, exemption will begin the first day of the calendar month following the month in which they provide Enbridge Gas with their Exemption Certificate.
9. The Exemption Certificate indicates that a customer is fully or partially exempt from paying the Federal Carbon Charge on their natural gas combustion fuel delivered by Enbridge Gas. Enbridge Gas uses a customer declaration form to identify which of a customer's accounts are exempt from the Federal Carbon Charge. Enbridge Gas also requests, and maintains on file, copies of each customer's CRA-issued Exemption Certificate and registration confirmation letter.
10. Enbridge Gas exempts customers from the Federal Carbon Charge in its billing systems based on the accounts listed on the customer declaration form, provided a CRA-issued Exemption Certificate and registration confirmation letter have been provided.<sup>9</sup> Customers who are no longer eligible for an exemption from Part 1 of the GGPPA are required, as stated on Enbridge Gas's declaration form, to notify Enbridge Gas of any changes to the information that they had initially provided. Upon receipt of such notification, Enbridge Gas will process the change within its billing systems effective at either the start of the next calendar month, or the next compliance period, whichever is applicable.

---

<sup>9</sup> Registration confirmation letters are not applicable to commercial greenhouse customers.

11. Under Part 1 of the GGPPA, biomethane, also known as RNG, is not subject to the Federal Carbon Charge. This includes volumes of RNG nominated by direct purchase customers and RNG procured as part of OptUp, Enbridge Gas's voluntary RNG program.
12. Enbridge Gas uses a RNG declaration form to have direct purchase customers declare their RNG usage and identify which customer accounts are eligible to receive exemption from the Federal Carbon Charge. For forecasting purposes, customers who have nominated their own RNG supply in 2023 were assumed to continue in 2024.
13. Volumes of RNG in OptUp were incorporated into the 2024 Customer-Related Volume forecasts based on the forecast provided in Exhibit C, Tab 2, Schedule 3 of the Voluntary Renewable Natural Gas Program Application (EB-2020-0066).
14. In August 2022, the federal government released a legislative proposal which outlined draft regulations amending the GGPPA to exempt hydrogen from the Federal Carbon Charge in proportion to the amount of hydrogen blended with the natural gas.<sup>10</sup> Based on conversations with the CRA in November 2022, Enbridge Gas understood that although the GGPPA had not yet been amended to include the exemption of hydrogen, hydrogen could be exempted from the Federal Carbon Charge as of August 2022, when the legislative proposal was announced. On March 27, 2023, the Fuel Charge Regulations, enacted under the GGPPA, were amended to confirm that hydrogen blended with natural gas is exempt from the Federal Carbon Charge, retroactive to August 2022.<sup>11</sup> This applies to volumes of hydrogen injected

---

<sup>10</sup> Draft Regulations Amending the Fuel Charge Regulations, August 10, 2022, <https://fin.canada.ca/drleg-apl/2022/ita-lir-0822-d.pdf>

<sup>11</sup> Regulations Amending Schedule 2 to the Greenhouse Gas Pollution Pricing Act, Amending the Fuel Charge Regulations and Repealing the Part 1 of the Greenhouse Gas Pollution Pricing Act Regulations (Alberta): SOR/2023-62, Government of Canada, March 27, 2023, <https://www.gazette.gc.ca/rp-pr/p2/2023/2023-04-12/html/sor-dors62-eng.html>

as part of the Low Carbon Energy Project (LCEP), Enbridge Gas's low-carbon hydrogen blending project in Markham, Ontario.

15. Enbridge Gas has incorporated forecasted quantities of blended hydrogen into the 2024 Customer-Related Volume forecast based on the estimated quantities provided by Enbridge Gas in the interrogatory response to Exhibit I.H2GO.2 of the Low Carbon Energy Project Application (EB-2019-0294).

#### 4. Forecast 2024 Facility Volume and Facility Carbon Charge Cost

16. Enbridge Gas's total 2024 regulated Facility Volume forecast is 144,793 10<sup>3</sup>m<sup>3</sup>.<sup>12</sup>

This results in an associated forecast 2024 Facility Carbon Charge cost of \$7.14 million. Facility Volumes are based on the amount of natural gas required for Enbridge Gas to operate its facilities as well as the emissions resulting from the distribution of natural gas. Facility Volumes are composed of: (i) Company Use Volumes including distribution buildings, boilers/line heaters, and NGV fleet volumes (which are subject to the Federal Carbon Charge under Part 1 of the GGPPA) for the period of April 1, 2024 to March 31, 2025; and, (ii) transmission and storage compression volumes (which are subject to the EPS as Enbridge Gas's transmission and storage system is a "covered facility" under the EPS Regulation) for the period of January 1, 2024 to December 31, 2024. The parameters underpinning Enbridge Gas's estimated EPS compliance obligation can be found at Exhibit B, Tab 1, Schedule 1, Appendix A. The forecast 2024 Facility Volume and associated Facility Carbon Charge cost estimate are subject to change based on actual Facility Volumes.

---

<sup>12</sup> Calculated as: Exhibit B, Tab 2, Schedule 3, Col. 1, Line 6 + Exhibit B, Tab 3, Schedule 3, Col. 1, Line 6.

## ENBRIDGE GAS ESTIMATED EPS COMPLIANCE OBLIGATION

1. On July 4, 2019, the government of Ontario filed the *Greenhouse Gas Emissions Performance Standards Regulation* (EPS Regulation) as an alternative to the federal OBPS program.<sup>1</sup> Enbridge Gas's storage and transmissions system is considered a "covered facility" under the EPS Regulation. On September 1, 2021 the *Order Amending Part 2 of Schedule 1 to the Greenhouse Gas Pollution Pricing Act* was published in the *Canada Gazette*, Part II, which removed Ontario from Part 2 of Schedule 1 of the GGPPA as of January 1, 2022.<sup>2</sup> Based on the EPS Regulation, the annual compliance obligation under EPS is calculated as follows:

***Compliance Obligation (tCO<sub>2</sub>e) =***

*Annual Facility Emissions – Total Annual Emissions Limit*

*Where:*

***Annual Facility Emissions (tCO<sub>2</sub>e) =***

*Annual EPS Emissions<sup>3</sup>*

***Total Annual Emissions Limit (tCO<sub>2</sub>e) =***

*BEI (tCO<sub>2</sub>e/production units) × SF (%) × Annual Production (production units)*

2. For forecasting purposes, the total annual emissions limit was based on the facility Baseline Emissions Intensity (BEI), along with the 2024 stringency factor (SF)<sup>4</sup> for transmitting natural gas and the facility specific Performance Standard (PS) calculation methodology, as outlined in the MECP's GHG Emissions Performance

---

<sup>1</sup> Ontario Regulation 241/19. <https://www.ontario.ca/laws/regulation/r19241#BK29>

<sup>2</sup> <https://canadagazette.gc.ca/rp-pr/p2/2021/2021-09-01/html/sor-dors195-eng.html>

<sup>3</sup> Ontario Regulation 390/18, s. 12(1). <https://www.ontario.ca/laws/regulation/180390>

<sup>4</sup> MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, December 2022, Table 4.2 page 36. [https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL\\_December%202022%20\(EN\).pdf](https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_December%202022%20(EN).pdf)

Standards and Methodology for the Determination of the Total Annual Emissions Limit, Formula 3.1.5-3.<sup>5</sup>

3. Forecast annual production is the forecast compressor energy use based on the following formula:

**Energy (MWh)<sup>6</sup> =**

*Rated Compressor Brake Power (MW) × Load (%) × Operating Hours (h)*

*Where:*

**Load (%) =**

*The % load of the engine*

*-or-*

*Calculated by Average Annual Speed (RPM) ÷ Max Rated Speed (RPM)*

4. To forecast the annual production value for 2024, Enbridge Gas has calculated the compressor energy use in MWh for 2020 to 2022 and used an average of this data. Enbridge Gas's detailed calculations of the 2024 forecast EPS emissions, total annual emissions limit, EPS compliance obligation and EPS facility carbon cost for each of the EGD rate zone and Union rate zones can be found at Exhibit B, Tab 2, Schedules 4 to 6 and at Exhibit B, Tab 3, Schedules 4 to 6, respectively.

---

<sup>5</sup> MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, December 2022, p. 25. [https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL\\_December%202022%20\(EN\).pdf](https://prod-environmental-registry.s3.amazonaws.com/2022-12/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_December%202022%20(EN).pdf)

<sup>6</sup> Amount of work required by a compressor to transport gas.

## FORECASTS - EGD RATE ZONE

1. The purpose of this evidence is to provide Enbridge Gas's 2024 forecast of volumes and the associated forecasted costs of complying with the GGPPA and the EPS Regulation, for the EGD rate zone.
2. This tab of evidence is organized as follows:
  1. Forecast 2024 Volume and Carbon Cost
  2. Forecast 2024 Customer Volumes and Federal Carbon Charge Cost
  3. Forecast 2024 Facility Volumes and Facility Carbon Charge Cost
    - 3.1. Company Use Volumes
    - 3.2. EPS Volumes

### 1. Forecast 2024 Volume and Carbon Cost

3. The EGD rate zone 2024 regulated volume forecast subject to the GGPPA and EPS Regulation is 10,584,782 10<sup>3</sup>m<sup>3</sup>.<sup>1</sup> This results in an associated forecast 2024 total cost of \$1,613.26 million. The details of this volume forecast and associated cost are included at Exhibit B, Tab 2, Schedules 2 to 6. The forecast employs the same methodologies which underpinned forecasts previously approved by the OEB. Enbridge Gas has excluded unregulated non-utility storage volumes and associated costs. Non-utility costs are those associated with Enbridge Gas's unregulated non-utility storage business.

### 2. Forecast 2024 Customer Volumes and Federal Carbon Charge Cost

4. The EGD rate zone total 2024 Customer Volume forecast subject to the Federal Carbon Charge is 10,571,786 10<sup>3</sup>m<sup>3</sup> as detailed at Exhibit B, Tab 2, Schedule 2. This results in an associated forecast 2024 Federal Carbon Charge cost of \$1,612.20 million as detailed at Exhibit B, Tab 2, Schedule 6. Enbridge Gas has

---

<sup>1</sup> Calculated as: Exhibit B, Tab 2, Schedule 2, Col. 3, Line 13 + Exhibit B, Tab 2, Schedule 3, Col. 1, Line 6.

included forecast distribution volumes subject to the Federal Carbon Charge for all rate classes within the EGD rate zone as detailed at Exhibit B, Tab 2, Schedule 2. The cost estimates are subject to change and are meant to be used for informational purposes only. Customers will be charged the Federal Carbon Charge monthly based on actual billed volumes.

### 3. Forecast 2024 Facility Volumes and Facility Carbon Charge Cost

5. The EGD rate zone total 2024 regulated Facility Volume forecast is 12,996  $10^3\text{m}^3$  as detailed at Exhibit B, Tab 2, Schedule 3. This results in an associated forecast 2024 Facility Carbon Charge cost of \$1.06 million as detailed at Exhibit B, Tab 2, Schedule 6. Facility Volumes are composed of: (i) Company Use Volumes including distribution buildings, boilers/line heaters, and NGV fleet volumes (which are subject to the Federal Carbon Charge under Part 1 of the GGPPA); and (ii) EPS Volumes which includes compressor fuel (which is subject to the EPS as Enbridge Gas's storage and transmission system is a "covered facility" under the EPS Regulation). The forecast 2024 regulated Facility Volume and associated forecast Facility Carbon Charge cost estimates are based on the best available information at this time and are subject to change based on actual Facility Volumes.

#### 3.1 Company Use Volumes

6. The regulated Company Use Volume forecast for 2024 including distribution buildings, boilers/line heaters and NGV fleet volumes for the EGD rate zone is 4,127  $10^3\text{m}^3$  as detailed at Exhibit B, Tab 2, Schedule 3.<sup>2</sup> This results in an associated forecast 2024 Facility Carbon Charge cost of \$0.63 million as detailed at Exhibit B, Tab 2, Schedule 6.

---

<sup>2</sup> Enbridge Gas's buildings, boiler/line heater and NGV fuel volume forecast for the EGD rate zone is based on a two-year average of consumption by location. For new buildings with no historical information, a volume estimate is used.



### 3.2 EPS Volumes

7. The EPS Volume forecast for 2024 for the EGD rate zone is 14,784 10<sup>3</sup>m<sup>3</sup> as detailed at Exhibit B, Tab 2, Schedule 3.<sup>3</sup> The corresponding forecast 2024 EPS obligation of 8,983 tCO<sub>2</sub>e results in a Facility Carbon Charge cost of \$0.72 million as detailed at Exhibit B, Tab 2, Schedules 5 and 6. Of the \$0.72 million, \$0.43 million is attributable to Enbridge Gas's regulated operations in the EGD rate zone.
8. The EPS Volume forecast is derived by combining forecasts for regulated utility and unregulated non-utility compression activity into an overall physical activity forecast. Enbridge Gas has excluded unregulated non-utility compression volumes and associated costs in deriving the Facility Carbon Charge cost to be recovered in regulated rates. The EPS Volume forecast for the EGD rate zone includes storage compression and dehydration fuel.
9. Enbridge Gas's detailed calculations of the 2024 forecast compressor emissions, total annual emissions limit, EPS compliance obligation and compressor fuel use cost for the EGD rate zone can be found at Exhibit B, Tab 2, Schedules 4 to 6.

---

<sup>3</sup> This includes both utility (regulated) and non-utility (unregulated) volumes.

Enbridge Gas Inc.  
EGD Rate Zone  
2024 Customer-Related Volumes by Rate Class (April 2024 to March 2025)  
(10<sup>3</sup>m<sup>3</sup>)

Line No.	Rate Class	Col. 1	Col. 2	Col. 3
		Forecast Volumes <sup>1</sup>	EPS Participant & Other Exempt Volumes <sup>2</sup>	(Col. 1 - Col. 2) Net Volumes
1	1	5,023,407	1,035	5,022,372
2	6	4,792,849	86,050	4,706,799
3	9	-	-	-
4	100	33,301	-	33,301
5	110	1,159,284	463,913	695,371
6	115	368,747	362,683	6,065
7	125 <sup>3</sup>	1,000,954	1,000,954	-
8	135	57,119	-	57,119
9	145	18,683	5,438	13,245
10	170	242,338	204,912	37,426
11	200 <sup>4</sup>	187,850	187,850	-
12	300	88	-	88
Total				
13	Customer-Related	12,884,621	2,312,834	10,571,786

Notes:

- (1) Forecast Volumes after DSM from April 1, 2024 to March 31, 2025.
- (2) Estimated forecast volumes for mandatory and voluntary participants in the Emissions Performance Standards (EPS), volumes qualifying for exemption for non-covered activities, partial relief (80%) for greenhouse operators, hydrogen volumes and Renewable Natural Gas (RNG) volumes. RNG volumes include the year 4 volumes outlined in the Voluntary RNG Program Application (EB-2020-0066) and have been allocated equally between the EGD and Union rate zones for forecasting purposes.
- (3) Dedicated unbundled customers.
- (4) Includes volumes delivered to downstream distributors and landfill gas.

Enbridge Gas Inc.  
 EGD Rate Zone  
2024 Facility-Related Volumes  
 (10<sup>3</sup>m<sup>3</sup>)

Line No.	Particulars	Col. 1	Col. 2	Col.3 (Col. 1 + Col.2)
		Utility Forecast Amount (regulated)	Non-Utility Forecast Amount (unregulated)	Total 2024 Forecast
1	Company Use - Buildings	638	-	638
2	Company Use - Boilers/Line Heaters	3,029	-	3,029
3	Company Use - NGV Fleet	460	-	460
4	Total Company Use <sup>1</sup>	4,127	-	4,127
5	Compressor Fuel <sup>2</sup>	8,869	5,915	14,784
6	Total Facility-Related	12,996	5,915	18,911

Notes:

(1) Forecast Company-Use volumes for April 1, 2024 to March 31, 2025.

(2) Forecast Compressor Fuel for January 1 to December 31, 2024.

Enbridge Gas Inc.  
EGD Rate Zone

Table 1  
2024 Forecast Compressor Emissions

Line No.	Particulars	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
		Volumes <sup>1</sup> (10 <sup>3</sup> m <sup>3</sup> )	CO <sub>2</sub> Emissions <sup>2</sup> (Tonnes CO <sub>2</sub> )	CH <sub>4</sub> Emissions <sup>3</sup> (Tonnes CH <sub>4</sub> )	N <sub>2</sub> O Emissions <sup>4</sup> (Tonnes N <sub>2</sub> O)	CO <sub>2</sub> e Emissions <sup>5</sup> (Tonnes CO <sub>2</sub> e)
1	Compressor Fuel & Transmission Ancillary Fuel	14,784	29,011	29	1	30,019

Notes:

- (1) Exhibit B, Tab 2, Schedule 3, Col. 3, Line 5.
- (2) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2022", Equation 2-9.
- (3) Col. 1 x Table 2, Col. 2, Line 1 x Table 2, Col. 2, Line 2.
- (4) Col. 1 x Table 2, Col. 3, Line 1 x Table 2, Col. 3, Line 2.
- (5) Col. 2 + (Col. 3 x Table 3, Col. 1, Line 1) + (Col. 4 x Table 3, Col. 2, Line 1).

Table 2  
Emission Factors

Line No.	Particulars	Units	Col. 1	Col. 2	Col. 3
			CO <sub>2</sub> Emission Factor	CH <sub>4</sub> Emission Factor <sup>1</sup>	N <sub>2</sub> O Emission Factor <sup>1</sup>
1	Natural Gas Pipelines	Tonne/GJ		0.00005	0.0000013
2	Heat Value <sup>2</sup>	GJ/10 <sup>3</sup> m <sup>3</sup>	39.08	39.08	39.08

Notes:

- (1) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2022", Table 2-5.
- (2) Assumed Budget Heat Value = 39.08 GJ/10<sup>3</sup>m<sup>3</sup>. In calculating actual emissions, actual heating value will be used.

Table 3  
Conversion Factors

Line No.	Particulars	Units	Col. 1	Col. 2
			Methane <sup>1</sup>	Nitrous Oxide <sup>1</sup>
1	Global Warming Potential for Carbon Dioxide Equivalent	Tonnes CO <sub>2</sub> e	28	265

Notes:

- (1) Ontario Regulation 390/18: Greenhouse Gas Emissions: Quantification, Reporting and Verification, Schedule 1.

Enbridge Gas Inc.  
 EGD Rate Zone  
2024 Forecast EPS Obligation

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6
Line No.	2024 Forecast Compressor Emissions <sup>1</sup> (tCO <sub>2</sub> e)	2020 - 2022 EGI Average Emission Intensity (tCO <sub>2</sub> e/MWh)	2024 Forecast Production <sup>2</sup> (MWh)	Facility Specific Performance Standard <sup>3</sup> (tCO <sub>2</sub> e/MWh)	Total Annual Emissions Limit <sup>4</sup> (tCO <sub>2</sub> e)	EPS Compliance Obligation <sup>5</sup> (tCO <sub>2</sub> e)
1	30,019	0.63	47,658	0.44	21,035	8,983

Notes:

(1) Exhibit B, Tab 2, Schedule 4, Table 1, Col. 5.

(2) Col. 1 / Col. 2.

(3) MECF's GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit – December 2022, Formula 3.1.5-3.

(4) Col. 3 x Col. 4.

(5) Col. 1 - Col. 5.

Enbridge Gas Inc.  
EGD Rate Zone  
2024 Summary of Customer-Related and Facility-Related Costs

Line No.	Particulars	2024 Forecast
	<u>Customer-Related Cost Forecast</u>	
1	Customer-related Forecast Volume ( $10^3\text{m}^3$ ) <sup>(1)</sup>	10,571,786
2	Federal Carbon Charge (\$/m <sup>3</sup> ) <sup>(2)</sup>	0.1525
3	<b>Total Customer-Related Costs (\$)</b>	<b>1,612,197,420</b>
	<u>Facility-Related Cost Forecast</u>	
4	Company-Use Forecast Volume ( $10^3\text{m}^3$ ) <sup>(3)</sup>	4,127
5	Federal Carbon Charge (\$/m <sup>3</sup> ) <sup>(2)</sup>	0.1525
6	Company Use Costs (\$)	629,325
7	EPS Obligation (tCO <sub>2</sub> e) <sup>(4)</sup>	8,983
8	Excess Emissions Charge (\$/tCO <sub>2</sub> e) <sup>(5)</sup>	80.00
9	Compressor Fuel Use Costs (\$)	718,658
10	Compressor Fuel Use Costs - Unregulated (\$) <sup>(6)</sup>	(287,522)
11	Compressor Fuel Use Costs - Regulated (\$)	431,135
12	<b>Total Facility Related Costs (\$)</b>	<b>1,060,460</b>
13	<b>Total Cost Forecast (\$)</b>	<b>1,613,257,880</b>

## Notes:

(1) Exhibit B, Tab 2, Schedule 2. Forecast volumes from April 1, 2024 to March 31, 2025.

(2) Exhibit A, Table 1.

(3) Exhibit B, Tab 2, Schedule 3, Column 1, Line 4. Forecast volumes from April 1, 2024 to March 31, 2025.

(4) Exhibit B, Tab 2, Schedule 5. Forecast from January 1 to December 31, 2024.

(5) EPS Regulation, Section 11.1.

(6) Unregulated EPS costs are allocated based on pro-rata regulated/unregulated total compressor volumes per Exhibit B, Tab 2, Schedule 3.

## FORECASTS - UNION RATE ZONES

1. The purpose of this evidence is to provide Enbridge Gas's 2024 forecast of volumes and the associated forecasted costs of complying with the GGPPA and the EPS Regulation, for the Union rate zones.
2. This tab of evidence is organized as follows:
  1. Forecast 2024 Volume and Carbon Cost
  2. Forecast 2024 Customer Volumes and Federal Carbon Charge Cost
  3. Forecast 2024 Facility Volumes and Facility Carbon Charge Cost
    - 3.1. Company Use Volumes
    - 3.2. EPS Volumes

### 1. Forecast 2024 Volume and Carbon Cost

3. The Union rate zones 2024 regulated volume forecast subject to the GGPPA and EPS Regulation is 6,873,672  $10^3\text{m}^3$ .<sup>1</sup> This results in an associated forecast 2024 total cost of \$1,034.21 million. The details of this volume forecast and associated cost are included at Exhibit B, Tab 3, Schedules 2 to 6. The forecast employs the same methodologies which underpinned forecasts previously approved by the OEB. Enbridge Gas has excluded unregulated non-utility storage volumes and associated costs. Non-utility costs are those associated with Enbridge Gas's unregulated non-utility storage business.

### 2. Forecast 2024 Customer Volumes and Federal Carbon Charge Cost

4. The Union rate zones total 2024 Customer Volume forecast subject to the Federal Carbon Charge is 6,741,875  $10^3\text{m}^3$  as detailed at Exhibit B, Tab 3, Schedule 2. This results in an associated forecast 2024 Federal Carbon Charge cost of \$1,028.14 million as detailed at Exhibit B, Tab 3, Schedule 6. Enbridge Gas has included

---

<sup>1</sup> Calculated as: Exhibit B, Tab 3, Schedule 2, Col. 3, Line 16 + Exhibit B, Tab 3, Schedule 3, Col. 1, Line 6.

forecast distribution volumes subject to the Federal Carbon Charge for all rate classes within the Union rate zones as detailed at Exhibit B, Tab 3, Schedule 2. The cost estimates are subject to change and are meant to be used for informational purposes only. Customers will be charged the Federal Carbon Charge monthly based on actual billed volumes.

### 3. Forecast 2024 Facility Volumes and Facility Carbon Charge Cost

5. The Union rate zones total 2024 regulated Facility Volume forecast is 131,797  $10^3\text{m}^3$  as detailed at Exhibit B, Tab 3, Schedule 3. This results in an associated forecast 2024 Facility Carbon Charge cost of \$6.08 million as detailed at Exhibit B, Tab 3, Schedule 6. Facility Volumes are composed of: (i) Company Use Volumes including distribution buildings, boilers/line heaters, and NGV fleet volumes (which are subject to the Federal Carbon Charge under Part 1 of the GGPPA); and (ii) EPS Volumes which includes compressor fuel (which is subject to the EPS as Enbridge Gas's storage and transmission system is a "covered facility" under the EPS Regulation). The forecast 2024 regulated Facility Volume and associated forecast Facility Carbon Charge cost estimates are based on the best available information at this time and are subject to change based on actual Facility Volumes.

#### 3.1 Company Use Volumes

6. The regulated Company Use Volume forecast for 2024 including distribution buildings, boilers/line heaters and NGV fleet volumes for the Union rate zones is 10,080  $10^3\text{m}^3$  as detailed at Exhibit B, Tab 3, Schedule 3.<sup>2</sup> This results in an associated forecast 2024 Facility Carbon Charge cost of \$1.54 million as detailed at Exhibit B, Tab 3, Schedule 6.<sup>3</sup>

---

<sup>2</sup> Enbridge Gas's buildings, boiler/line heater and NGV fuel volume forecast for the Union rate zones is based on a two-year average of consumption by location. For new buildings with no historical information, a volume estimate is used.

<sup>3</sup> Included in the Company Use Volume forecast for 2024 is 30  $10^3\text{m}^3$  for distribution buildings associated with non-utility unregulated storage activity. Enbridge Gas has not accounted for this amount separately as it is immaterial, resulting in costs of around \$4,500.



### 3.2 EPS Volumes

7. The EPS Volume forecast for 2024 for the Union rate zones is 136,674 10<sup>3</sup>m<sup>3</sup> as detailed at Exhibit B, Tab 3, Schedule 3.<sup>4</sup> The corresponding forecast 2024 EPS obligation of 63,714 tCO<sub>2</sub>e results in a Facility Carbon Charge cost of \$5.10 million as detailed at Exhibit B, Tab 3, Schedules 5 and 6. Of the \$5.10 million, \$4.54 million is attributable to Enbridge Gas's regulated operations in the Union rate zones.
8. The EPS Volume forecast is derived by combining forecasts for regulated utility and unregulated non-utility compression activity into an overall physical activity forecast. Enbridge Gas has excluded unregulated non-utility compression volumes and associated costs in deriving the Facility Carbon Charge cost to be recovered in regulated rates. The EPS Volume forecast for the Union rate zones includes transmission compression, storage compression and dehydration fuel.<sup>5</sup>
9. Enbridge Gas's detailed calculations of the 2024 forecast compressor emissions, total annual emissions limit, EPS compliance obligation and compressor fuel use cost for the Union rate zones can be found at Exhibit B, Tab 3, Schedule 4 to 6.

---

<sup>4</sup> This includes both utility (regulated) and non-utility (unregulated) volumes.

<sup>5</sup> The transmission and storage compression forecast is derived by combining forecasts for in-franchise and ex-franchise transmission and storage activity into an overall physical activity forecast. For dehydration fuel, average historical utilization is used to estimate the monthly forecasted usage.

Enbridge Gas Inc.  
Union Rate Zone  
2024 Customer-Related Volumes by Rate Class (April 2024 to March 2025)  
(10<sup>3</sup>m<sup>3</sup>)

Line No.	Rate Class	Col. 1	Col. 2	Col. 3
		Forecast Volumes <sup>1</sup>	EPS Participant & Other Exempt Volumes <sup>2</sup>	(Col. 1 - Col. 2) Net Volumes
1	1	991,715	312	991,403
2	10	328,079	10,654	317,426
3	M1	3,269,019	2,404	3,266,616
4	M2	1,322,588	90,889	1,231,698
5	20	857,126	721,209	135,917
6	25	252,236	237,495	14,741
7	100	1,043,637	982,288	61,349
8	M4	588,002	224,917	363,085
9	M5	59,033	14,958	44,075
10	M7	787,495	586,773	200,722
11	M9 <sup>3</sup>	96,860	96,860	-
12	M10 <sup>3</sup>	-	-	-
13	T1	415,185	334,795	80,390
14	T2	5,144,604	5,110,151	34,454
15	T3 <sup>3</sup>	278,032	278,032	-
Total				
16	Customer-Related	15,433,612	8,691,737	6,741,875

Notes:

- (1) Forecast Volumes after DSM from April 1, 2024 to March 31, 2025.
- (2) Estimated forecast volumes for mandatory and voluntary participants in the Emissions Performance Standards (EPS), volumes qualifying for exemption for non-covered activities, partial relief (80%) for greenhouse operators, hydrogen volumes and Renewable Natural Gas (RNG) volumes. RNG volumes include the year 4 volumes outlined in the Voluntary RNG Program Application (EB-2020-0066) and have been allocated equally between the EGD and Union rate zones for forecasting purposes.
- (3) Includes volumes delivered to downstream distributors and landfill gas.

Enbridge Gas Inc.  
 Union Rate Zone  
2024 Facility-Related Volumes  
 (10<sup>3</sup>m<sup>3</sup>)

Line No.	Particulars	Col. 1	Col. 2	Col.3 (Col. 1 + Col.2)
		Utility Forecast Amount (regulated)	Non-Utility Forecast Amount (unregulated)	Total 2024 Forecast
1	Company Use - Buildings	1,977	30	2,007
2	Company Use - Boilers/Line Heaters	8,068	-	8,068
3	Company Use - NGV Fleet	35	-	35
4	<u>Total Company Use<sup>1</sup></u>	<u>10,080</u>	<u>30</u>	<u>10,110</u>
5	Compressor Fuel <sup>2</sup>	121,717	14,957	136,674
6	<u>Total Facility-Related</u>	<u>131,797</u>	<u>14,988</u>	<u>146,784</u>

Notes:

- (1) Forecast Company-Use volumes for April 1, 2024 to March 31, 2025.  
 (2) Forecast Compressor Fuel for January 1 to December 31, 2024.

Enbridge Gas Inc.  
 Union Rate Zone

Table 1  
2024 Forecast Compressor Emissions

Line No.	Particulars	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
		Volumes <sup>1</sup> (10 <sup>3</sup> m <sup>3</sup> )	CO <sub>2</sub> Emissions <sup>2</sup> (Tonnes CO <sub>2</sub> )	CH <sub>4</sub> Emissions <sup>3</sup> (Tonnes CH <sub>4</sub> )	N <sub>2</sub> O Emissions <sup>4</sup> (Tonnes N <sub>2</sub> O)	CO <sub>2</sub> e Emissions <sup>5</sup> (Tonnes CO <sub>2</sub> e)
1	Compressor Fuel & Transmission Ancillary Fuel	136,674	268,196	267	7	277,513

Notes:

- (1) Exhibit B, Tab 3, Schedule 3, Col. 3, Line 5.
- (2) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2022", Equation 2-9.
- (3) Col. 1 x Table 2, Col. 2, Line 1 x Table 2, Col. 2, Line 2.
- (4) Col. 1 x Table 2, Col. 3, Line 1 x Table 2, Col. 3, Line 2.
- (5) Col. 2 + (Col. 3 x Table 3, Col. 1, Line 1) + (Col. 4 x Table 3, Col. 2, Line 1).

Table 2  
Emission Factors

Line No.	Particulars	Units	Col. 1	Col. 2	Col. 3
			CO <sub>2</sub> Emission Factor	CH <sub>4</sub> Emission Factor <sup>1</sup>	N <sub>2</sub> O Emission Factor <sup>1</sup>
1	Natural Gas Pipelines	Tonne/GJ		0.00005	0.0000013
2	Heat Value <sup>2</sup>	GJ/10 <sup>3</sup> m <sup>3</sup>	39.08	39.08	39.08

Notes:

- (1) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2022", Table 2-5.
- (2) Assumed Budget Heat Value = 39.08 GJ/10<sup>3</sup>m<sup>3</sup>. In calculating actual emissions, actual heating value will be used.

Table 3  
Conversion Factors

Line No.	Particulars	Units	Col. 1	Col. 2
			Methane <sup>1</sup>	Nitrous Oxide <sup>1</sup>
1	Global Warming Potential for Carbon Dioxide Equivalent	Tonnes CO <sub>2</sub> e	28	265

Notes:

- (1) Ontario Regulation 390/18: Greenhouse Gas Emissions: Quantification, Reporting and Verification, Schedule 1.

Enbridge Gas Inc.  
 Union Rate Zone  
2024 Forecast EPS Obligation

Line No.	Col. 1 2024 Forecast Compressor Emissions <sup>1</sup> (tCO <sub>2</sub> e)	Col. 2 2020 - 2022 EGI Average Emission Intensity (tCO <sub>2</sub> e/MWh)	Col. 3 2024 Forecast Production <sup>2</sup> (MWh)	Col. 4 Facility Specific Performance Standard <sup>3</sup> (tCO <sub>2</sub> e/MWh)	Col. 5 Total Annual Emissions Limit <sup>4</sup> (tCO <sub>2</sub> e)	Col. 6 EPS Compliance Obligation <sup>5</sup> (tCO <sub>2</sub> e)
1	277,513	0.57	484,388	0.44	213,799	63,714

Notes:

- (1) Exhibit B, Tab 3, Schedule 4, Table 1, Col. 5.
- (2) Col. 1 / Col. 2.
- (3) MECP's GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit – December 2022, Formula 3.1.5-3.
- (4) Col. 3 x Col. 4.
- (5) Col. 1 - Col. 5.

Enbridge Gas Inc.  
Union Rate Zone  
2024 Summary of Customer-Related and Facility-Related Costs

Line No.	Particulars	2024 Forecast
	<u>Customer-Related Cost Forecast</u>	
1	Customer-related Forecast Volume (10 <sup>3</sup> m <sup>3</sup> ) <sup>(1)</sup>	6,741,875
2	Federal Carbon Charge (\$/m <sup>3</sup> ) <sup>(2)</sup>	0.1525
3	<b>Total Customer-Related Costs (\$)</b>	<b>1,028,135,918</b>
	<u>Facility-Related Cost Forecast</u>	
4	Company-Use Forecast Volume (10 <sup>3</sup> m <sup>3</sup> ) <sup>(3)</sup>	10,080
5	Federal Carbon Charge (\$/m <sup>3</sup> ) <sup>(2)</sup>	0.1525
6	Company Use Costs (\$)	1,537,236
7	EPS Obligation (tCO <sub>2</sub> e) <sup>(4)</sup>	63,714
8	Excess Emissions Charge (\$/tCO <sub>2</sub> e) <sup>(5)</sup>	80.00
9	Compressor Fuel Use Costs (\$)	5,097,144
10	Compressor Fuel Use Costs - Unregulated (\$) <sup>(6)</sup>	(557,827)
11	Compressor Fuel Use Costs - Regulated (\$)	4,539,318
12	<b>Total Facility Related Costs (\$)</b>	<b>6,076,553</b>
13	<b>Total Cost Forecast (\$)</b>	<b>1,034,212,472</b>

Notes:

- (1) Exhibit B, Tab 3, Schedule 2. Forecast volumes from April 1, 2024 to March 31, 2025.
- (2) Exhibit A, Table A-1.
- (3) Exhibit B, Tab 3, Schedule 3, Column 1, Line 4. Forecast volumes from April 1, 2024 to March 31, 2025.
- (4) Exhibit B, Tab 3, Schedule 5. Forecast from January 1 to December 31, 2024.
- (5) EPS Regulation, Section 11.1.
- (6) Unregulated EPS costs are allocated based on pro-rata regulated/unregulated total compressor volumes per Exhibit B, Tab 3, Schedule 3.

## DEFERRAL AND VARIANCE ACCOUNTS

1. The purpose of this exhibit of evidence is to address deferral and variance account matters associated with Enbridge Gas's Application. As outlined in the Application, Enbridge Gas is seeking disposition of 2022 balances in FCPP-related deferral and variance accounts, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs), for each of the EGD rate zone and Union rate zones. Allocation and disposition of 2022 deferral and variance account balances is discussed in detail at Exhibit D, Tab 1, Schedule 1.
2. This exhibit of evidence is organized as follows:
  1. Established FCPP-Related Deferral and Variance Accounts
  2. 2022 FCPP-Related Deferral and Variance Account Balances
    - 2.1. 2022 Administration Costs Recorded in the Greenhouse Gas Emissions Administration Deferral Account (GGEADA)
    - 2.2. 2022 Customer-Related Costs Recorded in the Customer Carbon Charge – Variance Account (CCCVA)
    - 2.3. 2022 Facility-Related Costs Recorded in the Facility Carbon Charge – Variance Account (FCCVA)
  3. Forecast 2024 Administration Costs (for informational purposes only)

### 1. Established FCPP-Related Deferral and Variance Accounts

3. In its 2019 Application, to facilitate compliance with the GGPPA in 2019 and beyond, and ensure that the costs of compliance with the GGPPA were clearly delineated from those incurred under the Cap-and-Trade Program, Enbridge Gas requested OEB approval to establish five new deferral and variance accounts. The new accounts would record: (i) actual combined administration costs for all rate zones (effective January 1, 2019); (ii) Federal Carbon Charge cost variances between the actual costs incurred and the amount collected through rates related to the volumes delivered by Enbridge Gas for each of the EGD rate zone and Union rate zones (effective April 1, 2019); and (iii) Facility Carbon Charge cost variances between the

actual costs incurred and the amount collected through rates related to Company Use and Output-Based Pricing System (OBPS) volumes associated with Enbridge Gas's own operations for each of the EGD rate zone and the Union rate zones (effective January 1, 2019).<sup>1</sup>

4. In the OEB's Decision and Order on Enbridge Gas's 2019 Application, the OEB approved the establishment of Enbridge Gas's requested new FCPP-related deferral and variance accounts with a single exception; rather than approving a single deferral account to record the combined administration costs for all rate zones, the OEB directed that Enbridge Gas should establish two GGEADAs, one for each of the EGD rate zone and the Union rate zones.<sup>2</sup>
5. In its 2022 Application, Enbridge Gas applied to the OEB for approval to amend the wording of the FCPP-related deferral and variance accounting orders to recognize the transition from the federal OBPS to the provincial Emissions Performance Standards (EPS).<sup>3</sup> To reflect this change, Enbridge Gas requested to update the applicable account definitions to include reference to both federal and provincial regulations and update the applicable account names to remove the word "Federal", effective January 1, 2022. The OEB approved the amendments to the wording of the FCPP deferral and variance accounting orders as filed in its Decision and Order on Enbridge Gas's 2022 Application.<sup>4</sup>
6. Accordingly, Enbridge Gas's established FCPP-related deferral and variance accounts are:

---

<sup>1</sup> EB-2018-0205, EGI 2019 FCPP Application, October 10, 2018, Exhibit D, Tab 1, Schedule 1, pp. 2-4.

<sup>2</sup> EB-2018-0205, OEB Decision and Order, July 4, 2019, pp. 9-10.

<sup>3</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p. 3.

<sup>4</sup> EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.



1. GGEADA – EGD Rate Zone;<sup>5</sup>
  2. GGEADA – Union Rate Zones;<sup>6</sup>
  3. CCCVA – EGD Rate Zone;<sup>7</sup>
  4. CCCVA – Union Rate Zones;<sup>8</sup>
  5. FCCVA – EGD Rate Zone;<sup>9</sup> and
  6. FCCVA – Union Rate Zones.<sup>10</sup>
7. In its 2024 Rebasing Application, Enbridge Gas proposed to harmonize the established FCPP-related deferral and variance accounts effective January 1, 2024, due to the Company being an amalgamated entity and no longer requiring separate deferral and variance accounts for the EGD and Union rate zones.<sup>11</sup> Through the Settlement Proposal, parties agreed on harmonizing the FCPP deferral and variance accounts, with one modification; the deferral account would be renamed and the scope would be limited.<sup>12</sup> The OEB approved the harmonization and changes to the FCPP deferral and variances accounts as filed in its Decision on the Settlement Proposal to Enbridge Gas’s 2024 Rebasing Application.<sup>13</sup>
8. Accordingly, effective January 1, 2024, Enbridge Gas’s harmonized FCPP-related deferral and variances accounts are:<sup>14</sup>

---

<sup>5</sup> EGD Rate Zone Account No. 179-501, to record the administration costs associated with the impacts of federal and provincial regulations related to greenhouse gas emission requirements for Enbridge Gas within the EGD rate zone effective January 1, 2019.

<sup>6</sup> Union Rate Zones Account No. 179-422, to record the administration costs associated with the impacts of federal and provincial regulations related to greenhouse gas emission requirements for Enbridge Gas within the Union rate zones effective January 1, 2019.

<sup>7</sup> EGD Rate Zone Account No. 179-502, to record the variances between actual customer carbon costs and customer carbon costs recovered in rates for distribution volumes delivered by Enbridge Gas within the EGD rate zone effective April 1, 2019. Except for exempted customers as explained in Exhibit A.

<sup>8</sup> Union Rate Zones Account No. 179-421, to record the variances between actual customer carbon costs and customer carbon costs recovered in rates for distribution volumes delivered by Enbridge Gas within the Union rate zones effective April 1, 2019. Except for exempted customers as explained in Exhibit A.

<sup>9</sup> EGD Rate Zone Account No. 179-503, to record the variance between actual facility carbon costs and facility carbon costs recovered in rates within the EGD rate zone effective January 1, 2019.

<sup>10</sup> Union Rate Zones Account No. 179-420, to record the variance between actual facility carbon costs and facility carbon costs recovered in rates within the Union rate zones effective January 1, 2019.

<sup>11</sup> EB-2022-0200, 2024 Rebasing Application, October 31, 2022, Exhibit 9, Tab 1, Schedule 1.

<sup>12</sup> EB-2022-0200, 2024 Rebasing Application, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp. 53-55.

<sup>13</sup> EB-2022-0200, Decision on Settlement Proposal, August 17, 2023, p.1.

<sup>14</sup> EB-2022-0200, 2024 Rebasing Application, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 2, pp. 29-31.

1. Carbon Charges Bad Debt Deferral Account (CCBDDA) – Enbridge Gas Inc.;<sup>15</sup>
2. CCCVA – Enbridge Gas Inc.;<sup>16</sup> and
3. FCCVA – Enbridge Gas Inc.<sup>17</sup>

3. 2022 FCPP-Related Deferral and Variance Account Balances

9. Enbridge Gas is seeking to dispose of: 2022 administration costs of \$5.48 million in the GGEADAs and 2022 facility-related costs of \$(3.55) million in the FCCVAs.

3.1 2022 Administration Costs Recorded in the GGEADA

10. As set out in Table 1, Enbridge Gas’s 2022 administration costs are \$5.48 million. A description of variances to Enbridge Gas’s forecast 2022 administration costs follows:

Table 1  
2022 Administration Costs (\$millions)

Cost Element	2022 Forecasted Costs <sup>18</sup>	2022 Actual Costs <sup>19</sup>			Variance
		EGD Rate Zone	Union Rate Zones	Total	
IT Billing System	0.06	-	0.06	0.06	(0.00)
Staffing Resources	0.94	0.68	0.41	1.09	0.15
Consulting and External Legal Support	0.30	0.07	0.04	0.11	(0.19)
GHG Reporting and Verification	0.05	0.03	0.02	0.05	(0.00)
Bad Debt	3.72	1.68	2.07	3.75	0.04
Other Miscellaneous Costs	0.15	0.04	0.02	0.06	(0.09)
Interest <sup>20</sup>	N/A	0.18	0.18	0.36	0.36
Total	5.21	2.68	2.80	5.48	0.26

<sup>15</sup> Enbridge Gas Inc. Account No. 179-309, to record all of the bad debt related to carbon charges.

<sup>16</sup> Enbridge Gas Inc. Account No. 179-308, to record the variance between actual customer carbon costs and the customer carbon costs recovered in rates.

<sup>17</sup> Enbridge Gas Inc. Account No. 179-307, to record the variance between actual facility carbon costs and facility carbon costs recovered in rates.

<sup>18</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p. 4 and an update to the forecast 2022 staffing resources and bad debt through an interrogatory response at Exhibit I.EP.3, Table 2.

<sup>19</sup> Composed of actual 2022 costs from January to December 2022.

<sup>20</sup> Enbridge Gas did not include a 2022 forecast cost for interest.

11. Shared administration costs set out in Table 1, including costs related to: staffing resources, consulting and external legal support, GHG reporting and verification and other miscellaneous costs, have been allocated to the EGD rate zone and Union rate zones in proportion to actual customers' consumption volumes subject to the Federal Carbon Charge from January 1, 2022 to December 31, 2022.<sup>21</sup> Unique administration costs set out in Table 1 that are attributable to a particular rate zone, including costs related to IT billing systems and bad debt, have been allocated to that respective rate zone accordingly. Each of the cost categories set out in Table 1 is further discussed below.

12. In the OEB's Decision and Order on Enbridge Gas's 2023 Application, the OEB determined that the 2021 level of administration costs were sufficient, specifically in the areas of staffing resources, consulting and external legal support and other miscellaneous costs.<sup>22</sup> In 2021, the total cost related to these three administrative areas was \$1.49 million.<sup>23</sup> In 2022, the total cost of these three administrative areas was \$1.31 million, reflecting a decrease of \$0.18 million below the approved costs included in the OEB's direction in the Decision and Order.

### ***IT Billing System Costs***

13. In its 2022 Application, Enbridge Gas forecast IT billing system costs of \$0.06 million related to the revenue requirement associated with the additional billing system modification required in 2020 for the Union rate zones to comply with the GGPPA.<sup>24</sup>

14. The actual IT billing system costs for 2022 were \$0.06 million, all of which was related to the revenue requirement for the additional billing system modifications required for the Union rate zones.

---

<sup>21</sup> Approximately 63% of customer consumption volumes were attributable to the EGD rate zone and 37% of customer consumption volumes were attributable to the Union rate zones.

<sup>22</sup> EB-2022-0194, OEB Decision and Order, February 9, 2023, pp. 9-10.

<sup>23</sup> EB-2022-0194, EGI 2023 FCPP Application, September 29, Exhibit C, Tab 1, Schedule 1, p.4. GHG Reporting and Verification costs have been included in the \$1.49 million as these costs are a category of consulting costs.

<sup>24</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p. 10.

### **Staffing Resources**

15. In its 2022 Application, Enbridge Gas updated its 2022 staffing resources forecast to be \$0.94 million for salaries and wages, which included fully allocated costs for the five full time equivalents (FTEs) that comprised the Carbon Strategy team at that time, plus one additional half FTE.<sup>25</sup>

16. Actual salaries and wages costs incurred in 2022 were \$1.09 million. Staffing and wages costs were higher than forecast due to the Carbon Strategy team averaging 6.5 FTEs throughout 2022, one more than the 5.5 FTEs forecast. The increase in number of FTE's in 2022, reflects the resource requirements to facilitate compliance with the GGPPA and EPS Regulation, as well as supporting the Company in understanding and responding to new federal and provincial regulations related to GHG emission reductions.

17. The roles and responsibilities of the 6.5 FTEs that comprised the Carbon Strategy team in 2022 are outlined in the interrogatory response to Exhibit I.STAFF.5 of the 2023 Application.<sup>26</sup> While the individuals on the Carbon Strategy team are not solely allocated to work related to Enbridge Gas's carbon pricing obligations, each individual is allocated solely to work associated with the impacts of federal and provincial regulations related to GHG emissions requirements for Enbridge Gas. All of the FTEs in the Carbon Strategy team are incremental to what is included in base rates. These roles and responsibilities fit within the GGEADA definition of, "To record, as a debit (credit) in Deferral Account No. 179-501, the Administration costs associated with the impacts of federal and provincial regulations related to greenhouse gas emission requirements" as approved in the 2022 Application.<sup>27</sup>

18. In addition to the current federal and provincial climate policies that impact Enbridge Gas, such as the GGPPA and the EPS Regulation, the need to act against climate

---

<sup>25</sup> EB-2021-0209, EGI 2022 FCPP Application, Interrogatory Responses, Exhibit I.STAFF.4.

<sup>26</sup> EB-2022-0194, EGI 2023 FCPP Application, Interrogatory Responses, Exhibit I.STAFF.5.

<sup>27</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, Attachment 1, p.3.

change has led the federal and provincial governments to develop climate targets, plans, policies and regulations to reduce GHG emissions and transition to a low-carbon economy, which may impact the Company's business.<sup>28</sup> As this is a time of rapid policy evolution at both levels of government, Enbridge Gas expects that new climate policies and regulations will be coming into place. To stay abreast of the emerging and evolving government actions, individuals on the Carbon Strategy team are responsible for analysing the immediate or future impacts of developing federal and provincial regulations related to GHG emissions, climate change and energy transition on Enbridge Gas's operations.

### ***Consulting and External Legal Support***

19. In its 2022 Application, Enbridge Gas forecast consulting and external legal support costs of \$0.30 million for 2022.<sup>29</sup> Actual consulting and external legal support costs incurred in 2022 were \$0.11 million. Consulting and external legal support costs were lower than forecast due to Enbridge Gas leveraging existing internal FTE resources where applicable and utilizing the credit procurement work completed in 2021 for credit transactions completed in 2022.

### ***GHG Reporting and Verification***

20. In its 2022 Application, Enbridge Gas forecast costs of \$0.05 million for GHG reporting and verification of its 2021 OBPS emissions, completed in 2022.<sup>30</sup> Actual GHG reporting and verification costs incurred in 2022 were \$0.05 million, all of which was related to the verification of its 2021 OBPS report by a third-party auditor as required under the OBPS Regulations.

### ***Bad Debt***

21. In its 2022 FCPP Application, Enbridge Gas updated its 2022 bad debt forecasts as

---

<sup>28</sup> Refer to EB-2022-0200, Exhibit 1, Tab 10, Schedule 6, pp. 1-13 for emerging climate change and energy transition policies by the federal and provincial governments.

<sup>29</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p. 11.

<sup>30</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, pp. 11-12.

there was an update to the forecasting methodology.<sup>31</sup> The bad debt cost forecasts were updated to \$3.72 million for 2022.<sup>32</sup> Actual bad debt costs incurred in 2022 were \$3.75 million.

22. As outlined in EB-2021-0209, Exhibit I.VECC.7, the bad debt forecasting methodology distinguishes FCPP-related bad debt from “regular” bad debt by taking a percentage of the total Company bad debt based on the percentage of the total bill related to FCPP. The contributing factor to the forecast variance is an increase in actual total Company bad debt from what was forecast.

23. The \$3.75 million represents total 2022 bad debt related to the Federal Carbon Charge, with no amount removed due to COVID-19 impacts. Since the start of the COVID-19 pandemic in 2020, bad debt has increased for reasons that go beyond COVID-19 impacts; for example, the annual increase in Federal Carbon Charge rate in proportion to the total bill, and the year-over-year increase in total bad debt as a function of historic arrear balances, bankruptcy, gas prices, unemployment, inflation and general economic factors. Due to these factors impacting bad debt by varying degrees, it is not possible to isolate the bad debt increases as a function of a single cause and then translate that into a specific dollar amount of impact, whether that be due to COVID-19 impacts or any other general economic impacts. Therefore, Enbridge Gas is unable to segregate COVID-19 impacts from the regular FCPP-related bad debt allocated to the 2022 GGEADAs.

### ***Other Miscellaneous Costs***

24. In its 2022 Application, Enbridge Gas forecast 2022 other miscellaneous costs of \$0.15 million associated with customer outreach and communications, training, conferences, travel expenses, memberships and subscriptions associated with the GGPPA, EPS Regulation or other GHG or carbon pricing programs.<sup>33</sup> Actual other

---

<sup>31</sup> EB-2021-0209, EGI 2022 FCPP Application, Interrogatory Responses, Exhibit I.VECC.7.

<sup>32</sup> EB-2021-0209, EGI 2022 FCPP Application, Interrogatory Responses, Exhibit I.VECC.7, p. 2.

<sup>33</sup> EB-2021-0209, EGI 2022 FCPP Application, September 29, 2021, Exhibit C, p. 12.

miscellaneous costs incurred in 2022 were \$0.06 million. To adapt to the COVID-19 emergency, internal and external events were able to proceed virtually which limited costs related to activities such as travel and conferences, therefore reducing actual miscellaneous costs. Enbridge Gas also leveraged existing customer communication pathways, such as QRAM bill inserts, mass emails, webpages, and social media to communicate to customers regarding the FCPP, thus reducing actual 2022 costs related to customer communications.

### 3.2 2022 Customer-Related Costs Recorded in the CCCVA

25. Enbridge Gas tracks the difference between the Federal Carbon Charge amount collected through rates and the actual costs incurred in the CCCVA for each of the EGD rate zone and the Union rate zones. Enbridge Gas's customer-related obligation for January 1, 2022 to December 31, 2022 was \$1,481.53 million.
26. Enbridge Gas has recorded a 2022 customer-related variance of four thousand, nine hundred and twenty four dollars and thirty-seven cents (\$(4,924.37)) in the CCCVAs, including four thousand and forty-five dollars and thirty-four cents (\$(4,045.34)) for the EGD rate zone and eight hundred and seventy-nine dollars and three cents (\$(879.03)) for the Union rate zones. This reflects a variance between the amount of revenue billed through the Federal Carbon Charge and the subsequent amount Enbridge Gas remitted to the CRA.
27. The variances recorded are due to deliveries of renewable natural gas (RNG) and hydrogen to customers in 2022, through the Company's OptUp program and Low Carbon Energy Project (LCEP), respectively. Under the GGPPA and Fuel Charge Regulations, RNG and hydrogen are not subject to the Federal Carbon Charge.
28. Due to billing system functionality constraints, Enbridge Gas cannot reduce the Federal Carbon Charge only on the portion of a system supply customer's bill that is RNG or hydrogen. Given the limited quantity of exempt fuels delivered to customers to date, modifying the billing system to implement this functionality would

significantly increase administrative complexity and costs, for limited economic benefit to customers. Thus, Enbridge Gas applies the Federal Carbon Charge to all volumes of gas delivered to customers, including on the RNG and hydrogen volumes. As RNG and hydrogen delivered by Enbridge Gas reduces the Company's Federal Carbon Charge obligations and subsequent remittance to the CRA, any variance between the Federal Carbon Charges remitted to the CRA and the amount charged to customers are tracked in the CCCVAs, to be disposed to all customers subject to the Federal Carbon Charge.<sup>34</sup>

29. The variances are minor due to lower-than-expected participation in the OptUp program, leading to Enbridge Gas only procuring a small amount of RNG in 2022. Additionally, hydrogen was not considered exempt from the Federal Carbon Charge until mid-2022, therefore limiting the hydrogen volumes eligible for exemption.

30. Due to the small balances in the CCCVAs, Enbridge Gas is proposing to defer disposition until the balances become substantial enough to allow for generation of a unit rate that could credit customers. Enbridge Gas forecasts that a balance of approximately \$25,000 (approximately \$15,000 for the EGD rate zone and approximately \$10,000 for the Union rate zones) would be required in order to generate a unit rate.

### 3.3 2022 Facility-Related Costs Recorded in the FCCVA

31. As set out in Exhibit A, Tab 2, Schedule 1, Enbridge Gas's facility-related volumes and associated costs are composed of Company Use Volumes (facilities which are not covered under the EPS) and EPS Volumes from January 1, 2022 to December 31, 2022. Enbridge Gas's 2022 facility-related obligation was \$4.42 million (\$1.52 million related to Company Use Volumes and \$2.91 million related to EPS Volumes), of which \$4.05 million is attributable to Enbridge Gas's regulated utility operations.

---

<sup>34</sup> EB-2020-0066, Decision and Order, September 24, 2020, pp. 16-17.



32. Enbridge Gas has recorded a 2022 facility-related variance of \$(3.55) million in the FCCVAs, including \$(0.29) million for the EGD rate zone and \$(3.26) million for the Union rate zones.<sup>35</sup> This reflects a variance between the actual and forecast facility-related costs, and a variance in the amount of revenue billed through the Facility Carbon Charge, due to a difference in Customer Volumes realized.

33. Through an interrogatory response at Exhibit I.STAFF.7 of the 2023 Application, Enbridge Gas explained that there was an error in forecasting the 2021 company own use volumes due to the incorrect heating degree day factors being used, which led to increased company use forecasts. This error extended to the 2022 company use volume forecasts filed in the 2022 Application, thus causing the actual 2022 company use volumes to be much lower than forecast.<sup>36</sup> Enbridge Gas has updated the 2022 company use forecasts in order to show a more accurate representation of the variance. Table 2 below shows the variance related to the difference between 2022 forecast regulated facility-related volumes and actual regulated facility-related volumes for 2022.

Table 2<sup>37</sup>  
2022 Regulated Facility-Related Volumes/Emissions and Costs

	Updated 2022 Forecasted Volumes & Emissions	Updated 2022 Forecasted Costs (\$millions)	2022 Actual Volumes & Emissions	2022 Actual Costs (\$millions)	Variance (\$millions)
Company Use	16,521 10 <sup>3</sup> m <sup>3</sup>	1.45	17,266 10 <sup>3</sup> m <sup>3</sup>	1.51	0.06
EPS	76,193 tCO <sub>2</sub> e	3.81	50,811 tCO <sub>2</sub> e	2.54	(1.27)
Total	-	5.26	-	4.05	(1.21)

<sup>35</sup> This variance reflects consideration of: (i) applying the Federal Carbon Charge Rate for Marketable Natural Gas of 7.83 ¢/m<sup>3</sup> from January 1, 2022 – March 31, 2022 and 9.79 ¢/m<sup>3</sup> from April 1, 2022 to December 31, 2022 set out in Exhibit A, Tab 2, Schedule 1, Table 1 to actual Company Use Volumes of natural gas consumed in the operation of Enbridge Gas's facilities from January 1, 2022 to December 31, 2022; (ii) Enbridge Gas's 2022 EPS obligation of \$2.54 million related to regulated utility operations for the January 1, 2022 to December 31, 2022 period; (iii) actual billed amounts for the January 1, 2022 to December 31, 2022 period; and (iv) interest of approximately \$(0.39) million.

<sup>36</sup> The regulated company use volume forecast, filed in Enbridge Gas's 2022 Application, was 27,781 10<sup>3</sup>m<sup>3</sup>.

<sup>37</sup> Only volumes/emissions and associated costs related to regulated utility operations are included.

34. The main driver of the \$(1.21) million variance is related to the difference between 2022 forecast regulated EPS emissions and actual regulated EPS emissions. This was due to lower than forecast EPS compressor fuel volumes, and a reduction to the actual 2022 emissions intensity (tCO<sub>2e</sub>/MWh) related to transmission and storage operations, resulting in fewer EPS emissions and therefore a lower compliance obligation.

#### 4. Forecast 2024 Administration Costs

35. In Enbridge Gas's 2024 Rebasing Application, the Company proposed to consolidate the two GGEADAs into one Enbridge Gas account and recover administrative costs associated with current federal and provincial regulations related to GHG emissions requirements through 2024 base rates, except for bad debt.<sup>38</sup> Enbridge Gas forecasted that these 2024 administrative costs, exclusive of bad debt, previously captured in the GGEADAs will total \$1.4 million.<sup>39</sup>

36. In the Settlement Proposal to Enbridge Gas's 2024 Rebasing Application, parties agreed to consolidating the GGEADAs into a single Enbridge Gas account, on the condition the GGEADA be renamed the CCBDDA and the scope of the account be limited to recording bad debt costs associated with carbon charges.<sup>40</sup> The OEB approved of these account modifications, effective January 1, 2024, in its Decision on the Settlement Proposal.<sup>41</sup>

37. Therefore, starting in 2024, Enbridge Gas will only record FCPP-related bad debt costs in the CCBDDA. Accordingly, Enbridge Gas has provided a forecast for the 2024 bad debt costs for informational purposes only and will seek recovery of its actual 2024 bad debt costs in a future proceeding.

---

<sup>38</sup> EB-2022-0200, 2024 Rebasing Application, October 31, 2022, Exhibit 9, Tab 1, Schedule 2, p. 25.

<sup>39</sup> EB-2022-0200, 2024 Rebasing Application, Interrogatory Responses, March 8, 2023, Exhibit I.9.1-STAFF-251.

<sup>40</sup> EB-2022-0200, 2024 Rebasing Application, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp. 53-55.

<sup>41</sup> EB-2022-0200, Decision on Settlement Proposal, August 17, 2023, p.1.

Table 3  
Forecast 2024 Bad Debt Costs

Cost Element	2024 Total Forecast Costs (\$millions)
Bad Debt	8.80

38. Enbridge Gas estimates that it will incur approximately \$8.80 million in incremental bad debt expenses in 2024 based on forecasted costs recoverable from customers as a result of the GGPPA and EPS Regulation, as set out in Exhibit B, Tab 1, Schedule 1. While Enbridge Gas has included total 2024 forecast bad debt costs in Table 3, only actual bad debt related to the GGPPA and EPS Regulation will be recorded in the CCBDDA.

## COST RECOVERY

1. The purpose of this exhibit is to support Enbridge Gas's request to update the impacts of the GGPPA and EPS Regulation in rates for the EGD and Union rate zones, effective April 1, 2024 and to address the proposed allocation and disposition of Enbridge Gas's 2022 FCPP-related deferral and variance account balances, as described at Exhibit C, Tab 1, Schedule 1. Accordingly, Enbridge Gas requests approval of: (i) the proposed rate changes on a final basis, effective April 1, 2024; and (ii) the allocation and disposition of the 2022 FCPP-related deferral and variance account balances, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs), to be disposed of in the first available QRAM following an OEB decision as early as April 1, 2024.<sup>1</sup>
  
2. This exhibit of evidence is organized as follows:
  1. 2024 FCPP-Related Unit Rates
    - 1.1 2024 Federal Carbon Charge
    - 1.2 2024 Facility Carbon Charge
    - 1.3 2024 Administration Costs
    - 1.4 Bill Impacts of Carbon Charges
  2. 2022 Deferral and Variance Account Balances
    - 2.1 2022 CCCVA
    - 2.2 2022 FCCVA
    - 2.3 2022 GGEADA
    - 2.4 Proposed Disposition of Deferral and Variance Account Balances
    - 2.5 Bill Impacts of Deferral and Variance Account Disposition

Supporting schedules and appendices:

- Exhibit D, Tab 2, Schedules 1 to 5: Cost Recovery - EGD Rate Zone
- Exhibit D, Tab 3, Schedules 1 to 5: Cost Recovery - Union Rate Zones

---

<sup>1</sup> Refer to Exhibit C, Tab 1, Schedule 1 for more information on the proposal to defer disposition of the CCCVAs.

## 1. 2024 FCPP-Related Unit Rates

3. Under the GGPPA, Enbridge Gas is required to remit payment of the Federal Carbon Charge to the Government of Canada for volumes delivered to its customers and for Company Use Volumes. Enbridge Gas is also required to remit payment for any excess emissions related to EPS volumes. These costs will be recovered from customers through the Federal Carbon Charge and Facility Carbon Charge unit rates, respectively.
4. The Federal Carbon Charge and Facility Carbon Charge unit rates are summarized at Exhibit D, Tab 2, Schedule 1, page 3 for the EGD rate zone and at Exhibit D, Tab 3, Schedule 1, page 3 for the Union rate zones. A summary of the Federal Carbon Charge and Facility Carbon Charge unit rates by rate class for the EGD rate zone is provided at Exhibit D, Tab 2, Schedule 1, pages 4 to 5.

### 1.1 2024 Federal Carbon Charge

5. Effective April 1, 2024, Enbridge Gas proposes to increase the Federal Carbon Charge from 12.3900 ¢/m<sup>3</sup> (or \$65/tCO<sub>2e</sub>) to 15.2500 ¢/m<sup>3</sup> (or \$80/tCO<sub>2e</sub>), as outlined in the GGPPA and set out at Exhibit A, Tab 2, Schedule 1, Table 1.<sup>2</sup>
6. The Federal Carbon Charge is applicable to distribution customers in all rate zones. Entities that are exempt under Part 1 of the GGPPA will not be charged the Federal Carbon Charge. Further, Enbridge Gas will apply 20% of the Federal Carbon Charge to distribution volumes for eligible commercial greenhouse customers, resulting in 80% greenhouse relief. The Federal Carbon Charge is shown as a separate line item on customers' bills, where applicable.
7. Enbridge Gas will track the difference between the Federal Carbon Charge amount collected through rates and the actual costs incurred in the CCCVA.

---

<sup>2</sup> The GGPPA, Schedule 2 and Schedule 4, <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>.

8. The Federal Carbon Charge customer-related forecast volumes and costs by rate class for the April 1, 2024 to March 31, 2025 period is set out at Exhibit D, Tab 2, Schedule 1, page 1 for the EGD rate zone and at Exhibit D, Tab 3, Schedule 1, page 1 for the Union rate zones.

### 1.2 2024 Facility Carbon Charge

9. Enbridge Gas incurs costs of compliance with the GGPPA and EPS Regulation that are associated with its own operations. Enbridge Gas's Facility Carbon Charge costs are incurred in relation to both Company Use Volumes (generated from distribution buildings, boilers/line heaters and NGV fleet volumes) and EPS Volumes (generated from compressor fuel volumes). The total estimated Facility Carbon Charge cost for the April 1, 2024 to March 31, 2025 time period is \$7.137 million; \$1.060 million for the EGD rate zone and \$6.077 million for the Union rate zones, as detailed at Exhibit B, Tab 2, Schedule 1 and at Exhibit B, Tab 3, Schedule 1 respectively.
10. Enbridge Gas recovers Facility Carbon Charge costs from rate classes based on in-franchise delivery volumes and ex-franchise transportation volumes. All customers in each rate class are responsible for the Facility Carbon Charge costs, regardless of whether the customer is exempt from the Federal Carbon Charge. Enbridge Gas adds the Facility Carbon Charge to the current approved delivery or transportation charges on customers' bills.
11. A common Facility Carbon Charge was approved by the Board in its Decision and Order for the Company's 2023 Application to be implemented with the January 1, 2024 QRAM.<sup>3</sup> Effective April 1, 2024, Enbridge Gas is proposing to decrease the common Facility Carbon Charge from 0.0159 ¢/m<sup>3</sup> to 0.0143 ¢/m<sup>3</sup>. When expressed in \$/GJ, the Facility Carbon Charge remains unchanged at \$0.004/GJ. The derivation of the 2024 Facility Carbon Charge is detailed at Exhibit D, Tab 2, Schedule 1 and Exhibit D, Tab 3, Schedule 1.

---

<sup>3</sup> EB-2022-0194 Decision and Order, February 9, 2023, pp. 7 – 8.

12. As filed in the 2023 Application, Enbridge Gas will track the difference between the amount collected through rates and the actual costs incurred in the FCCVA.

### 1.3 2024 Administration Costs

13. Administration costs incurred in 2024 will be recorded in the CCBDDA and disposed of in a future proceeding, as described at Exhibit A, Tab 2, Schedule 1 and Exhibit C, Tab 1, Schedule 1.

### 1.4 Bill Impacts of Carbon Charges

14. For the EGD rate zone, the bill impact of the 2024 carbon charges for a typical residential customer with annual consumption of 2,400 m<sup>3</sup> is \$366.35 per year, which is an increase of \$68.79 per year over 2023. Exhibit D, Tab 2, Schedule 2 details customer bill impacts for the EGD rate zone relative to October 1, 2023 QRAM rates (EB-2023-0211).

15. For the Union rate zones, the bill impact of the 2024 carbon charges for a typical residential customer with annual consumption of 2,200 m<sup>3</sup> is \$335.83 per year, which is an increase of \$62.91 per year over 2023. Exhibit D, Tab 3, Schedule 2 details customer bill impacts for the Union rate zones relative to October 1, 2023 QRAM rates (EB-2023-0211).

## 2. 2022 Deferral and Variance Account Balances

16. Enbridge Gas is requesting approval of the allocation and disposition of the 2022 final balances in its GGEADA and FCCVA for each of the EGD and Union rate zones. Although there are small balances in the CCCVAs for both the EGD and Union rate zones, Enbridge Gas is proposing to defer disposition until the balances are larger. A description of 2022 FCPP-related deferral and variance account balances is provided at Exhibit C, Tab 1, Schedule 1. The deferral and variance account balances are provided at Exhibit D, Tab 2, Schedule 3 for the EGD rate zone and at Exhibit D, Tab 3, Schedule 3 for the Union rate zones.

### 2.1 2022 CCCVA

17. As per Exhibit C, Tab 1, Schedule 1, Enbridge Gas proposes to defer disposition of the CCCVA balances.

### 2.2 2022 FCCVA

18. Enbridge Gas proposes to allocate FCCVA balances to rate classes in proportion to actual in-franchise distribution and ex-franchise transportation volumes from January 1, 2022 to December 31, 2022. Unit rates for disposition are derived using actual volumes for the January 1, 2022 to December 31, 2022 time period. The methodology to derive the allocation and disposition unit rates is the same for the EGD and Union rate zones.

### 2.3 2022 GGEADA

19. Enbridge Gas proposes to allocate GGEADA balances to rate classes in proportion to the number of customers for the EGD rate zone and 2013 OEB-approved administrative and general expenses for the Union rate zones. The proposed allocation methodologies for each rate zone are consistent with the allocations approved in the disposition of Enbridge Gas's 2021 FCPP-related deferral and variance account balances (EB-2022-0194). Unit rates for disposition are derived using actual volumes for the January 1, 2022 to December 31, 2022 time period. The methodology to derive the disposition unit rates is the same for the EGD and Union rate zones.

### 2.4 Proposed Disposition of Deferral and Variance Account Balances

20. Enbridge Gas proposes to dispose of the balances with a one-time billing adjustment recovered in one month for all customers in the EGD and the Union rate zones.

21. Enbridge Gas proposes to dispose of the approved 2022 FCPP-related deferral and variance account balances with the first QRAM application following the OEB's approval, as early as April 1, 2024. Unit rates for disposition can be found at



Exhibit D, Tab 2, Schedule 4 for the EGD rate zone and at Exhibit D, Tab 3, Schedule 4 for the Union rate zones.

*2.5 Bill Impacts of Deferral and Variance Account Disposition*

22. For the EGD rate zone, the bill impact of the proposed deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,400 m<sup>3</sup> is \$1.12. Exhibit D, Tab 2, Schedule 5 details the customer bill impacts for the EGD rate zone.

23. For the Union rate zones, the bill impact of the proposed deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,200 m<sup>3</sup> is \$0.81 for customers in the Union South rate zone and \$1.06 for customers in the Union North rate zone. Exhibit D, Tab 3, Schedule 5 details customer bill impacts for the Union rate zones.

ENBRIDGE GAS INC.  
EGD Rate Zone

TABLE 1: 2024 CUSTOMER-RELATED VOLUMES AND DERIVATION OF FEDERAL CARBON CHARGE UNIT RATE

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
Line	Rate	Forecast Volumes <sup>1</sup> (10 <sup>3</sup> m <sup>3</sup> )	Less: Transportation Volumes (10 <sup>3</sup> m <sup>3</sup> )	Customer-Related Forecast Volumes <sup>2</sup> (10 <sup>3</sup> m <sup>3</sup> )	EPS Participant & Other Exempt Volumes <sup>3</sup> (10 <sup>3</sup> m <sup>3</sup> )	Net Volumes <sup>4</sup> (10 <sup>3</sup> m <sup>3</sup> )	Federal Carbon Charge <sup>5</sup> (\$/m <sup>3</sup> )	Federal Carbon Cost <sup>6</sup> (\$)	Federal Carbon Charge Unit Rate <sup>7</sup> (¢/m <sup>3</sup> )
1.1	1	5,023,407	0	5,023,407	1,035	5,022,372	0.1525	765,911,788	
1.2	6	4,792,849	0	4,792,849	86,050	4,706,799	0.1525	717,786,895	
1.3	9	0	0	0	0	0	0.1525	0	
1.4	100	33,301	0	33,301	0	33,301	0.1525	5,078,426	
1.5	110	1,159,284	0	1,159,284	463,913	695,371	0.1525	106,044,034	
1.6	115	368,747	0	368,747	362,683	6,065	0.1525	924,841	
1.7a	125	1,000,954	0	1,000,954	1,000,954	0	0.1525	0	
1.8	135	57,119	0	57,119	0	57,119	0.1525	8,710,663	
1.9	145	18,683	0	18,683	5,438	13,245	0.1525	2,019,894	
1.10	170	242,338	0	242,338	204,912	37,426	0.1525	5,707,427	
1.11	200	187,850	0	187,850	187,850	0	0.1525	0	
1.12	300	88	0	88	0	88	0.1525	13,452	
1.13	332	2,254,826	2,254,826	0	0	0	0.1525	0	
1	Total	15,139,447	2,254,826	12,884,621	2,312,834	10,571,786		1,612,197,420	15.2500

Notes:

- (1) Exhibit B, Tab 2, Schedule 2, Col. 1 + Rate 332 forecast volume.
- (2) Col. 1 - Col. 2.
- (3) Exhibit B, Tab 2, Schedule 2, Col. 2.
- (4) Col. 3 - Col. 4.
- (5) Exhibit B, Tab 2, Schedule 6, Line 2.
- (6) Col. 5 x Col. 6 x 1000.
- (7) (Col. 7 / (Col. 5 x 1000)) x 100.

ENBRIDGE GAS INC.  
 EGD Rate Zone  
TABLE 2: DERIVATION OF 2024 FACILITY CARBON CHARGE

Line No.	Particulars	Col. 1 Enbridge Gas Combined
1	Total Facility Carbon Cost (\$000's)	7,137 <sup>1</sup>
2	2024 Forecast Volumes (10 <sup>3</sup> m <sup>3</sup> )	49,923,705 <sup>2</sup>
3	Facility Carbon Charge (cents / m <sup>3</sup> ) (line 1 / line 2 * 100)	0.0143
4	Facility Carbon Charge (\$/GJ) (line 3 / Heat Value * 10) <sup>x</sup>	0.004 <sup>3</sup>

Notes:

- (1) Exhibit B, Tab 2, Schedule 6, Line 12/1000 + Exhibit B, Tab 3, Schedule 6, Line 12/1000
- (2) Exhibit D, Tab 2, Schedule 1, Page 1, Column 1, Line 1 + Exhibit D, Tab 3, Schedule 1, Column (a), Line 25
- (3) Per Exhibit D, Tab 1, Schedule 1, the common Facility Carbon Charge is applicable to all customers.  
 Conversion to GJs based on heat value adjustment of 39.17 GJ/10<sup>3</sup>m<sup>3</sup>.

ENBRIDGE GAS INC.  
 EGD Rate Zone  
TABLE 3: 2024 CARBON CHARGE UNIT RATE SUMMARY

		Col. 1	
Line	Unit Rate		
	( $\phi/m^3$ )		
1	Federal Carbon Charge	15.2500	1
2	Facility Carbon Charge	0.0143	2
3	<b>Total</b>	<b>15.2643</b>	<b>3</b>

Notes:

- (1) Table 1, Line 1, Col. 8.
- (2) Table 2, Line 3, Col. 1.
- (3) Line 1 + Line 2.

ENBRIDGE GAS INC.  
 EGD Rate Zone

TABLE 4: 2024 CARBON CHARGE UNIT RATE BY RATE CLASS

Rate Class		(¢/m <sup>3</sup> )
Rate 1	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 6	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 9	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 100	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 110	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 115	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 125	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 135	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 145	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143

Rate Class		(¢/m <sup>3</sup> )
Rate 170	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 200	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 300	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 300 Interruptible	Federal Carbon Charge (If Applicable)	15.2500
	Facility Carbon Charge	0.0143
Rate 315	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 316	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 320	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0000
Rate 325	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 330	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 331	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143
Rate 332	Federal Carbon Charge (If Applicable)	0.0000
	Facility Carbon Charge	0.0143

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - RESIDENTIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
		<b>Heating &amp; Water Htg.</b>				<b>Heating, Water Htg. &amp; Other Uses</b>			
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
1.1	VOLUME	m <sup>3</sup> 3,064	3,064	0	0.0%	4,691	4,691	0	0.0%
1.2	CUSTOMER CHG.	\$ 274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$ 288.67	288.47	0.20	0.1%	435.22	434.92	0.30	0.1%
1.4	LOAD BALANCING	§ \$ 178.09	178.09	0.00	0.0%	272.66	272.66	0.00	0.0%
1.5	SALES COMMDTY	\$ 404.36	404.36	0.00	0.0%	619.08	619.08	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$ 467.26	379.63	87.63	23.1%	715.38	581.21	134.16	23.1%
1.7	TOTAL SALES	\$ 1,612.94	1,525.11	87.83	5.8%	2,316.89	2,182.43	134.46	6.2%
1.8	TOTAL T-SERVICE	\$ 1,208.58	1,120.75	87.83	7.8%	1,697.81	1,563.35	134.46	8.6%

		<b>Heating Only</b>				<b>Heating &amp; Water Htg.</b>			
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
2.1	VOLUME	m <sup>3</sup> 1,955	1,955	0	0.0%	2,005	2,005	0	0.0%
2.2	CUSTOMER CHG.	\$ 274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
2.3	DISTRIBUTION CHG.	\$ 185.14	185.02	0.13	0.1%	192.65	192.52	0.13	0.1%
2.4	LOAD BALANCING	§ \$ 113.63	113.63	0.00	0.0%	116.54	116.54	0.00	0.0%
2.5	SALES COMMDTY	\$ 258.00	258.00	0.00	0.0%	264.60	264.60	0.00	0.0%
2.6	FEDERAL CARBON CHARGE	\$ 298.14	242.22	55.91	23.1%	305.76	248.42	57.34	23.1%
2.7	TOTAL SALES	\$ 1,129.48	1,073.44	56.04	5.2%	1,154.11	1,096.64	57.47	5.2%
2.8	TOTAL T-SERVICE	\$ 871.47	815.43	56.04	6.9%	889.51	832.04	57.47	6.9%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - RESIDENTIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Heating, Pool Htg. &amp; Other Uses</b>				<b>General &amp; Water Htg.</b>				
		<u>(A)</u>	<u>(B)</u>	<u>CHANGE</u>		<u>(A)</u>	<u>(B)</u>	<u>CHANGE</u>		
				(A) - (B)	%			(A) - (B)	%	
3.1	VOLUME	m <sup>3</sup>	5,048	5,048	0	0.0%	1,081	1,081	0	0.0%
3.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$	468.05	467.73	0.32	0.1%	108.73	108.66	0.07	0.1%
3.4	LOAD BALANCING	§ \$	293.41	293.41	0.00	0.0%	62.83	62.83	0.00	0.0%
3.5	SALES COMMDTY	\$	666.19	666.19	0.00	0.0%	142.66	142.66	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$	769.82	625.45	144.37	23.1%	164.85	133.94	30.92	23.1%
3.7	TOTAL SALES	\$	2,472.03	2,327.33	144.70	6.2%	753.63	722.65	30.99	4.3%
3.8	TOTAL T-SERVICE	\$	1,805.84	1,661.14	144.70	8.7%	610.97	579.99	30.99	5.3%

		<b>Heating &amp; Water Htg.</b>				<b>Heating &amp; Water Htg.</b>				
		<u>(A)</u>	<u>(B)</u>	<u>CHANGE</u>		<u>(A)</u>	<u>(B)</u>	<u>CHANGE</u>		
				(A) - (B)	%			(A) - (B)	%	
4.1	VOLUME	m <sup>3</sup>	2,480	2,480	0	0.0%	2,400	2,400	0	0.0%
4.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$	235.69	235.53	0.16	0.1%	228.15	227.99	0.15	0.1%
4.4	LOAD BALANCING	§ \$	144.15	144.15	0.00	0.0%	139.50	139.50	0.00	0.0%
4.5	SALES COMMDTY	\$	327.29	327.29	0.00	0.0%	316.73	316.73	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$	378.20	307.27	70.93	23.1%	366.00	297.36	68.64	23.1%
4.7	TOTAL SALES	\$	1,359.89	1,288.80	71.09	5.5%	1,324.94	1,256.14	68.79	5.5%
4.8	TOTAL T-SERVICE	\$	1,032.60	961.51	71.09	7.4%	1,008.21	939.41	68.79	7.3%

§ The Load Balancing Charge shown here includes transportation charges



**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - COMMERCIAL & INDUSTRIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Commercial Heating &amp; Other Uses</b>				<b>Com. Htg., Air Cond'ng &amp; Other Uses</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
1.1	VOLUME	m <sup>3</sup>	22,606	22,606	0	0.0%	29,278	29,278	0	0.0%
1.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$	1,694.79	1,693.34	1.45	0.1%	2,174.48	2,172.61	1.87	0.1%
1.4	LOAD BALANCING	§ \$	1,290.80	1,290.80	0.00	0.0%	1,671.77	1,671.77	0.00	0.0%
1.5	SALES COMMDTY	\$	2,988.60	2,988.60	0.00	0.0%	3,870.67	3,870.67	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$	3,447.42	2,800.88	646.53	23.1%	4,464.90	3,627.54	837.35	23.1%
1.7	TOTAL SALES	\$	10,352.57	9,704.59	647.98	6.7%	13,112.78	12,273.55	839.22	6.8%
1.8	TOTAL T-SERVICE	\$	7,363.96	6,715.98	647.98	9.6%	9,242.11	8,402.88	839.22	10.0%

		<b>Medium Commercial Customer</b>				<b>Large Commercial Customer</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
2.1	VOLUME	m <sup>3</sup>	169,563	169,563	0	0.0%	339,125	339,125	0	0.0%
2.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
2.3	DISTRIBUTION CHG.	\$	9,122.77	9,111.92	10.85	0.1%	16,700.73	16,679.02	21.70	0.1%
2.4	LOAD BALANCING	§ \$	9,682.04	9,682.04	0.00	0.0%	19,364.01	19,364.01	0.00	0.0%
2.5	SALES COMMDTY	\$	22,416.90	22,416.90	0.00	0.0%	44,833.67	44,833.67	0.00	0.0%
2.6	FEDERAL CARBON CHARGE	\$	25,858.36	21,008.86	4,849.50	23.1%	51,716.56	42,017.59	9,698.98	23.1%
2.7	TOTAL SALES	\$	68,011.03	63,150.67	4,860.35	7.7%	133,545.93	123,825.25	9,720.68	7.9%
2.8	TOTAL T-SERVICE	\$	45,594.13	40,733.77	4,860.35	11.9%	88,712.26	78,991.58	9,720.68	12.3%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - COMMERCIAL & INDUSTRIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Industrial General Use</b>										
<b>Industrial Heating &amp; Other Uses</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
3.1	VOLUME	m <sup>3</sup>	43,285	43,285	0	0.0%	63,903	63,903	0	0.0%
3.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$	3,004.34	3,001.57	2.77	0.1%	4,028.92	4,024.83	4.09	0.1%
3.4	LOAD BALANCING	§ \$	2,471.57	2,471.57	0.00	0.0%	3,648.86	3,648.86	0.00	0.0%
3.5	SALES COMMDTY	\$	5,722.45	5,722.45	0.00	0.0%	8,448.23	8,448.23	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$	6,600.96	5,363.01	1,237.95	23.1%	9,745.21	7,917.58	1,827.63	23.1%
3.7	TOTAL SALES	\$	18,730.28	17,489.56	1,240.72	7.1%	26,802.17	24,970.46	1,831.72	7.3%
3.8	TOTAL T-SERVICE	\$	13,007.83	11,767.11	1,240.72	10.5%	18,353.94	16,522.23	1,831.72	11.1%
<b>Medium Industrial Customer</b>										
<b>Large Industrial Customer</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
4.1	VOLUME	m <sup>3</sup>	169,563	169,563	0	0.0%	339,124	339,124	0	0.0%
4.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$	9,342.51	9,331.66	10.85	0.1%	16,864.22	16,842.52	21.70	0.1%
4.4	LOAD BALANCING	§ \$	9,682.04	9,682.04	0.00	0.0%	19,363.96	19,363.96	0.00	0.0%
4.5	SALES COMMDTY	\$	22,416.90	22,416.90	0.00	0.0%	44,833.54	44,833.54	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$	25,858.36	21,008.86	4,849.50	23.1%	51,716.41	42,017.46	9,698.95	23.1%
4.7	TOTAL SALES	\$	68,230.77	63,370.41	4,860.35	7.7%	133,709.09	123,988.44	9,720.65	7.8%
4.8	TOTAL T-SERVICE	\$	45,813.86	40,953.51	4,860.35	11.9%	88,875.55	79,154.90	9,720.65	12.3%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Rate 100 - Small Commercial Firm</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
1.1	VOLUME	m <sup>3</sup>	339,188	339,188	0	0.0%	598,567	598,567	0	0.0%
1.2	CUSTOMER CHG.	\$	1,613.64	1,613.64	0.00	0.0%	1,613.64	1,613.64	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$	14,889.15	14,867.44	21.71	0.1%	72,471.09	72,432.78	38.31	0.1%
1.4	LOAD BALANCING	\$	19,367.61	19,367.61	0.00	0.0%	34,178.13	34,178.13	0.00	0.0%
1.5	SALES COMMDTY	\$	44,842.00	44,842.00	0.00	0.0%	79,132.93	79,132.93	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$	51,726.17	42,025.39	9,700.78	23.1%	91,281.47	74,162.45	17,119.02	23.1%
1.7	TOTAL SALES	\$	132,438.57	122,716.09	9,722.48	7.9%	278,677.27	261,519.94	17,157.32	6.6%
1.8	TOTAL T-SERVICE	\$	87,596.57	77,874.09	9,722.48	12.5%	199,544.33	182,387.01	17,157.32	9.4%

<b>Rate 100 - Large Industrial Firm</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>				<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
2.1	VOLUME	m <sup>3</sup>	1,500,000	1,500,000	0	0.0%				
2.2	CUSTOMER CHG.	\$	1,613.64	1,613.64	0.00	0.0%				
2.3	DISTRIBUTION CHG.	\$	145,533.09	145,437.09	96.00	0.1%				
2.4	LOAD BALANCING	\$	85,649.90	85,649.90	0.00	0.0%				
2.5	SALES COMMDTY	\$	198,305.95	198,305.95	0.00	0.0%				
2.6	FEDERAL CARBON CHARGE	\$	228,750.00	185,850.00	42,900.00	23.1%				
2.7	TOTAL SALES	\$	659,852.58	616,856.58	42,996.00	7.0%				
2.8	TOTAL T-SERVICE	\$	461,546.63	418,550.63	42,996.00	10.3%				

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
<b>Rate 145 - Small Commercial Interr.</b>					<b>Rate 145 - Average Commercial Interr.</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
3.1	VOLUME	m <sup>3</sup> 339,188	339,188	0	0.0%	598,568	598,568	0	0.0%
3.2	CUSTOMER CHG.	\$ 1,631.16	1,631.16	0.00	0.0%	1,631.16	1,631.16	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$ 25,717.95	25,696.24	21.71	0.1%	42,219.45	42,181.14	38.31	0.1%
3.4	LOAD BALANCING	\$ 15,077.17	15,077.17	0.00	0.0%	26,607.33	26,607.33	0.00	0.0%
3.5	SALES COMMDTY	\$ 44,647.22	44,647.22	0.00	0.0%	78,789.33	78,789.33	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$ 51,726.17	42,025.39	9,700.78	23.1%	91,281.62	74,162.58	17,119.04	23.1%
3.7	TOTAL SALES	\$ 138,799.66	129,077.17	9,722.48	7.5%	240,528.88	223,371.53	17,157.35	7.7%
3.8	TOTAL T-SERVICE	\$ 94,152.44	84,429.96	9,722.48	11.5%	161,739.55	144,582.20	17,157.35	11.9%
<b>Rate 145 - Small Industrial Interr.</b>					<b>Rate 145 - Average Industrial Interr.</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
4.1	VOLUME	m <sup>3</sup> 339,188	339,188	0	0.0%	598,567	598,567	0	0.0%
4.2	CUSTOMER CHG.	\$ 1,631.16	1,631.16	0.00	0.0%	1,631.16	1,631.16	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$ 25,993.85	25,972.14	21.71	0.1%	42,463.65	42,425.35	38.31	0.1%
4.4	LOAD BALANCING	\$ 15,077.17	15,077.17	0.00	0.0%	26,607.28	26,607.28	0.00	0.0%
4.5	SALES COMMDTY	\$ 44,647.22	44,647.22	0.00	0.0%	78,789.20	78,789.20	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$ 51,726.17	42,025.39	9,700.78	23.1%	91,281.47	74,162.45	17,119.02	23.1%
4.7	TOTAL SALES	\$ 139,075.56	129,353.07	9,722.48	7.5%	240,772.75	223,615.43	17,157.32	7.7%
4.8	TOTAL T-SERVICE	\$ 94,428.34	84,705.86	9,722.48	11.5%	161,983.56	144,826.23	17,157.32	11.8%

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
		<b>Rate 110 - Small Ind. Firm - 50% LF</b>				<b>Rate 110 - Average Ind. Firm - 50% LF</b>			
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
5.1	VOLUME	m <sup>3</sup> 598,568	598,568	0	0.0%	9,976,121	9,976,121	0	0.0%
5.2	CUSTOMER CHG.	\$ 7,722.60	7,722.60	0.00	0.0%	7,722.60	7,722.60	0.00	0.0%
5.3	DISTRIBUTION CHG.	\$ 15,885.11	15,846.80	38.31	0.2%	260,555.66	259,917.19	638.47	0.2%
5.4	LOAD BALANCING	\$ 27,824.48	27,824.48	0.00	0.0%	463,740.81	463,740.81	0.00	0.0%
5.5	SALES COMMDTY	\$ 78,765.74	78,765.74	0.00	0.0%	1,312,760.69	1,312,760.69	0.00	0.0%
5.6	FEDERAL CARBON CHARGE	\$ 91,281.62	74,162.58	17,119.04	23.1%	1,521,358.45	1,236,041.39	285,317.06	23.1%
5.7	TOTAL SALES	\$ 221,479.55	204,322.20	17,157.35	8.4%	3,566,138.21	3,280,182.68	285,955.53	8.7%
5.8	TOTAL T-SERVICE	\$ 142,713.81	125,556.46	17,157.35	13.7%	2,253,377.53	1,967,421.99	285,955.53	14.5%
		<b>Rate 110 - Average Ind. Firm - 75% LF</b>				<b>Rate 115 - Large Ind. Firm - 80% LF</b>			
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
				(A) - (B)	%			(A) - (B)	%
6.1	VOLUME	m <sup>3</sup> 9,976,120	9,976,120	0	0.0%	69,832,850	69,832,850	0	0.0%
6.2	CUSTOMER CHG.	\$ 7,722.60	7,722.60	0.00	0.0%	8,185.32	8,185.32	0.00	0.0%
6.3	DISTRIBUTION CHG.	\$ 208,518.34	207,879.86	638.47	0.3%	1,149,601.84	1,145,132.53	4,469.30	0.4%
6.4	LOAD BALANCING	\$ 463,740.76	463,740.76	0.00	0.0%	3,123,393.62	3,123,393.62	0.00	0.0%
6.5	SALES COMMDTY	\$ 1,312,760.55	1,312,760.55	0.00	0.0%	9,189,325.19	9,189,325.19	0.00	0.0%
6.6	FEDERAL CARBON CHARGE	\$ 1,521,358.30	1,236,041.27	285,317.03	23.1%	10,649,509.63	8,652,290.12	1,997,219.51	23.1%
6.7	TOTAL SALES	\$ 3,514,100.55	3,228,145.05	285,955.50	8.9%	24,120,015.59	22,118,326.78	2,001,688.81	9.0%
6.8	TOTAL T-SERVICE	\$ 2,201,340.00	1,915,384.49	285,955.50	14.9%	14,930,690.40	12,929,001.59	2,001,688.81	15.5%

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR NON-EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Rate 135 - Seasonal Firm</b>				<b>Rate 170 - Average Ind. Interr. - 50% LF</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
7.1	VOLUME	m <sup>3</sup>	598,567	598,567	0	0.0%	9,976,121	9,976,121	0	0.0%
7.2	CUSTOMER CHG.	\$	1,522.68	1,522.68	0.00	0.0%	3,678.60	3,678.60	0.00	0.0%
7.3	DISTRIBUTION CHG.	\$	12,975.31	12,937.00	38.31	0.3%	81,860.87	81,222.40	638.47	0.8%
7.4	LOAD BALANCING	\$	21,111.92	21,111.92	0.00	0.0%	342,777.75	342,777.75	0.00	0.0%
7.5	SALES COMMDTY	\$	78,811.47	78,811.47	0.00	0.0%	1,312,760.66	1,312,760.66	0.00	0.0%
7.6	FEDERAL CARBON CHARGE	\$	91,281.47	74,162.45	17,119.02	23.1%	1,521,358.45	1,236,041.39	285,317.06	23.1%
7.7	TOTAL SALES	\$	205,702.85	188,545.53	17,157.32	9.1%	3,262,436.34	2,976,480.81	285,955.53	9.6%
7.8	TOTAL T-SERVICE	\$	126,891.38	109,734.06	17,157.32	15.6%	1,949,675.68	1,663,720.15	285,955.53	17.2%

		<b>Rate 170 - Average Ind. Interr. - 75% LF</b>				<b>Rate 170 - Large Ind. Interr. - 75% LF</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
8.1	VOLUME	m <sup>3</sup>	9,976,120	9,976,120	0	0.0%	69,832,850	69,832,850	0	0.0%
8.2	CUSTOMER CHG.	\$	3,678.60	3,678.60	0.00	0.0%	3,678.60	3,678.60	0.00	0.0%
8.3	DISTRIBUTION CHG.	\$	73,856.48	73,218.00	638.47	0.9%	399,104.57	394,635.27	4,469.30	1.1%
8.4	LOAD BALANCING	\$	342,777.72	342,777.72	0.00	0.0%	2,399,444.38	2,399,444.38	0.00	0.0%
8.5	SALES COMMDTY	\$	1,312,760.53	1,312,760.53	0.00	0.0%	9,189,325.02	9,189,325.02	0.00	0.0%
8.6	FEDERAL CARBON CHARGE	\$	1,521,358.30	1,236,041.27	285,317.03	23.1%	10,649,509.63	8,652,290.12	1,997,219.51	23.1%
8.7	TOTAL SALES	\$	3,254,431.62	2,968,476.12	285,955.50	9.6%	22,641,062.19	20,639,373.38	2,001,688.81	9.7%
8.8	TOTAL T-SERVICE	\$	1,941,671.09	1,655,715.59	285,955.50	17.3%	13,451,737.18	11,450,048.36	2,001,688.81	17.5%

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - RESIDENTIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Heating &amp; Water Htg.</b>				<b>Heating, Water Htg. &amp; Other Uses</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
1.1	VOLUME	m <sup>3</sup>	3,064	3,064	0	0.0%	4,691	4,691	0	0.0%
1.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$	288.67	288.47	0.20	0.1%	435.22	434.92	0.30	0.1%
1.4	LOAD BALANCING	§	178.09	178.09	0.00	0.0%	272.66	272.66	0.00	0.0%
1.5	SALES COMMDTY	\$	404.36	404.36	0.00	0.0%	619.08	619.08	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
1.7	TOTAL SALES	\$	1,145.68	1,145.48	0.20	0.0%	1,601.51	1,601.21	0.30	0.0%
1.8	TOTAL T-SERVICE	\$	741.32	741.12	0.20	0.0%	982.44	982.14	0.30	0.0%

		<b>Heating Only</b>				<b>Heating &amp; Water Htg.</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
2.1	VOLUME	m <sup>3</sup>	1,955	1,955	0	0.0%	2,005	2,005	0	0.0%
2.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
2.3	DISTRIBUTION CHG.	\$	185.14	185.02	0.13	0.1%	192.65	192.52	0.13	0.1%
2.4	LOAD BALANCING	§	113.63	113.63	0.00	0.0%	116.54	116.54	0.00	0.0%
2.5	SALES COMMDTY	\$	258.00	258.00	0.00	0.0%	264.60	264.60	0.00	0.0%
2.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
2.7	TOTAL SALES	\$	831.34	831.21	0.13	0.0%	848.35	848.22	0.13	0.0%
2.8	TOTAL T-SERVICE	\$	573.34	573.21	0.13	0.0%	583.75	583.62	0.13	0.0%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - RESIDENTIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Heating, Pool Htg. &amp; Other Uses</b>				<b>General &amp; Water Htg.</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
3.1	VOLUME	m <sup>3</sup>	5,048	5,048	0	0.0%	1,081	1,081	0	0.0%
3.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$	468.05	467.73	0.32	0.1%	108.73	108.66	0.07	0.1%
3.4	LOAD BALANCING	§ \$	293.41	293.41	0.00	0.0%	62.83	62.83	0.00	0.0%
3.5	SALES COMMDTY	\$	666.19	666.19	0.00	0.0%	142.66	142.66	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3.7	TOTAL SALES	\$	1,702.21	1,701.89	0.32	0.0%	588.78	588.71	0.07	0.0%
3.8	TOTAL T-SERVICE	\$	1,036.02	1,035.70	0.32	0.0%	446.12	446.05	0.07	0.0%

		<b>Heating &amp; Water Htg.</b>				<b>Heating &amp; Water Htg.</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
4.1	VOLUME	m <sup>3</sup>	2,480	2,480	0	0.0%	2,400	2,400	0	0.0%
4.2	CUSTOMER CHG.	\$	274.56	274.56	0.00	0.0%	274.56	274.56	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$	235.69	235.53	0.16	0.1%	228.15	227.99	0.15	0.1%
4.4	LOAD BALANCING	§ \$	144.15	144.15	0.00	0.0%	139.50	139.50	0.00	0.0%
4.5	SALES COMMDTY	\$	327.29	327.29	0.00	0.0%	316.73	316.73	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4.7	TOTAL SALES	\$	981.69	981.53	0.16	0.0%	958.94	958.78	0.15	0.0%
4.8	TOTAL T-SERVICE	\$	654.40	654.24	0.16	0.0%	642.21	642.05	0.15	0.0%

§ The Load Balancing Charge shown here includes transportation charges



**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - COMMERCIAL & INDUSTRIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Commercial Heating &amp; Other Uses</b>				<b>Com. Htg., Air Cond'ng &amp; Other Uses</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
1.1	VOLUME	m <sup>3</sup>	22,606	22,606	0	0.0%	29,278	29,278	0	0.0%
1.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$	1,694.79	1,693.34	1.45	0.1%	2,174.48	2,172.61	1.87	0.1%
1.4	LOAD BALANCING	§	1,290.80	1,290.80	0.00	0.0%	1,671.77	1,671.77	0.00	0.0%
1.5	SALES COMMDTY	\$	2,988.60	2,988.60	0.00	0.0%	3,870.67	3,870.67	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
1.7	TOTAL SALES	\$	6,905.15	6,903.70	1.45	0.0%	8,647.88	8,646.01	1.87	0.0%
1.8	TOTAL T-SERVICE	\$	3,916.55	3,915.10	1.45	0.0%	4,777.21	4,775.34	1.87	0.0%
		<b>Medium Commercial Customer</b>				<b>Large Commercial Customer</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
2.1	VOLUME	m <sup>3</sup>	169,563	169,563	0	0.0%	339,125	339,125	0	0.0%
2.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
2.3	DISTRIBUTION CHG.	\$	9,122.77	9,111.92	10.85	0.1%	16,700.73	16,679.02	21.70	0.1%
2.4	LOAD BALANCING	§	9,682.04	9,682.04	0.00	0.0%	19,364.01	19,364.01	0.00	0.0%
2.5	SALES COMMDTY	\$	22,416.90	22,416.90	0.00	0.0%	44,833.67	44,833.67	0.00	0.0%
2.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
2.7	TOTAL SALES	\$	42,152.67	42,141.82	10.85	0.0%	81,829.37	81,807.67	21.70	0.0%
2.8	TOTAL T-SERVICE	\$	19,735.77	19,724.92	10.85	0.1%	36,995.70	36,974.00	21.70	0.1%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - COMMERCIAL & INDUSTRIAL CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Industrial General Use</b>										
<b>Industrial Heating &amp; Other Uses</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
3.1	VOLUME	m <sup>3</sup>	43,285	43,285	0	0.0%	63,903	63,903	0	0.0%
3.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$	3,004.34	3,001.57	2.77	0.1%	4,028.92	4,024.83	4.09	0.1%
3.4	LOAD BALANCING	§ \$	2,471.57	2,471.57	0.00	0.0%	3,648.86	3,648.86	0.00	0.0%
3.5	SALES COMMDTY	\$	5,722.45	5,722.45	0.00	0.0%	8,448.23	8,448.23	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3.7	TOTAL SALES	\$	12,129.32	12,126.55	2.77	0.0%	17,056.97	17,052.88	4.09	0.0%
3.8	TOTAL T-SERVICE	\$	6,406.87	6,404.10	2.77	0.0%	8,608.74	8,604.65	4.09	0.0%
<b>Medium Industrial Customer</b>										
<b>Large Industrial Customer</b>										
			<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>	
					(A) - (B)	%			(A) - (B)	%
4.1	VOLUME	m <sup>3</sup>	169,563	169,563	0	0.0%	339,124	339,124	0	0.0%
4.2	CUSTOMER CHG.	\$	930.96	930.96	0.00	0.0%	930.96	930.96	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$	9,342.51	9,331.66	10.85	0.1%	16,864.22	16,842.52	21.70	0.1%
4.4	LOAD BALANCING	§	9,682.04	9,682.04	0.00	0.0%	19,363.96	19,363.96	0.00	0.0%
4.5	SALES COMMDTY	\$	22,416.90	22,416.90	0.00	0.0%	44,833.54	44,833.54	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4.7	TOTAL SALES	\$	42,372.41	42,361.56	10.85	0.0%	81,992.68	81,970.97	21.70	0.0%
4.8	TOTAL T-SERVICE	\$	19,955.51	19,944.66	10.85	0.1%	37,159.14	37,137.43	21.70	0.1%

§ The Load Balancing Charge shown here includes transportation charges

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Rate 100 - Small Commercial Firm</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
1.1	VOLUME	m <sup>3</sup>	339,188	339,188	0	0.0%	598,567	598,567	0	0.0%
1.2	CUSTOMER CHG.	\$	1,613.64	1,613.64	0.00	0.0%	1,613.64	1,613.64	0.00	0.0%
1.3	DISTRIBUTION CHG.	\$	14,889.15	14,867.44	21.71	0.1%	72,471.09	72,432.78	38.31	0.1%
1.4	LOAD BALANCING	\$	19,367.61	19,367.61	0.00	0.0%	34,178.13	34,178.13	0.00	0.0%
1.5	SALES COMMDTY	\$	44,842.00	44,842.00	0.00	0.0%	79,132.93	79,132.93	0.00	0.0%
1.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
1.7	TOTAL SALES	\$	80,712.40	80,690.70	21.71	0.0%	187,395.80	187,357.49	38.31	0.0%
1.8	TOTAL T-SERVICE	\$	35,870.40	35,848.70	21.71	0.1%	108,262.87	108,224.56	38.31	0.0%
<b>Rate 100 - Large Industrial Firm</b>										
			<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>					
					(A) - (B)	%				
2.1	VOLUME	m <sup>3</sup>	1,500,000	1,500,000	0	0.0%				
2.2	CUSTOMER CHG.	\$	1,613.64	1,613.64	0.00	0.0%				
2.3	DISTRIBUTION CHG.	\$	145,533.09	145,437.09	96.00	0.1%				
2.4	LOAD BALANCING	\$	85,649.90	85,649.90	0.00	0.0%				
2.5	SALES COMMDTY	\$	198,305.95	198,305.95	0.00	0.0%				
2.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%				
2.7	TOTAL SALES	\$	431,102.58	431,006.58	96.00	0.0%				
2.8	TOTAL T-SERVICE	\$	232,796.63	232,700.63	96.00	0.0%				

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Rate 145 - Small Commercial Interr.</b>										
<b>Rate 145 - Average Commercial Interr.</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
3.1	VOLUME	m <sup>3</sup>	339,188	339,188	0	0.0%	598,568	598,568	0	0.0%
3.2	CUSTOMER CHG.	\$	1,631.16	1,631.16	0.00	0.0%	1,631.16	1,631.16	0.00	0.0%
3.3	DISTRIBUTION CHG.	\$	25,717.95	25,696.24	21.71	0.1%	42,219.45	42,181.14	38.31	0.1%
3.4	LOAD BALANCING	\$	15,077.17	15,077.17	0.00	0.0%	26,607.33	26,607.33	0.00	0.0%
3.5	SALES COMMDTY	\$	44,647.22	44,647.22	0.00	0.0%	78,789.33	78,789.33	0.00	0.0%
3.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3.7	TOTAL SALES	\$	87,073.49	87,051.78	21.71	0.0%	149,247.26	149,208.95	38.31	0.0%
3.8	TOTAL T-SERVICE	\$	42,426.27	42,404.56	21.71	0.1%	70,457.93	70,419.63	38.31	0.1%
<b>Rate 145 - Small Industrial Interr.</b>										
<b>Rate 145 - Average Industrial Interr.</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
4.1	VOLUME	m <sup>3</sup>	339,188	339,188	0	0.0%	598,567	598,567	0	0.0%
4.2	CUSTOMER CHG.	\$	1,631.16	1,631.16	0.00	0.0%	1,631.16	1,631.16	0.00	0.0%
4.3	DISTRIBUTION CHG.	\$	25,993.85	25,972.14	21.71	0.1%	42,463.65	42,425.35	38.31	0.1%
4.4	LOAD BALANCING	\$	15,077.17	15,077.17	0.00	0.0%	26,607.28	26,607.28	0.00	0.0%
4.5	SALES COMMDTY	\$	44,647.22	44,647.22	0.00	0.0%	78,789.20	78,789.20	0.00	0.0%
4.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4.7	TOTAL SALES	\$	87,349.39	87,327.68	21.71	0.0%	149,491.29	149,452.98	38.31	0.0%
4.8	TOTAL T-SERVICE	\$	42,702.17	42,680.46	21.71	0.1%	70,702.09	70,663.78	38.31	0.1%

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
<b>Rate 110 - Small Ind. Firm - 50% LF</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>						
				(A) - (B)	%	<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
5.1	VOLUME	m <sup>3</sup>	598,568	598,568	0	0.0%	9,976,121	9,976,121	0	0.0%
5.2	CUSTOMER CHG.	\$	7,722.60	7,722.60	0.00	0.0%	7,722.60	7,722.60	0.00	0.0%
5.3	DISTRIBUTION CHG.	\$	15,885.11	15,846.80	38.31	0.2%	260,555.66	259,917.19	638.47	0.2%
5.4	LOAD BALANCING	\$	27,824.48	27,824.48	0.00	0.0%	463,740.81	463,740.81	0.00	0.0%
5.5	SALES COMMDTY	\$	78,765.74	78,765.74	0.00	0.0%	1,312,760.69	1,312,760.69	0.00	0.0%
5.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
5.7	TOTAL SALES	\$	130,197.93	130,159.62	38.31	0.0%	2,044,779.76	2,044,141.29	638.47	0.0%
5.8	TOTAL T-SERVICE	\$	51,432.19	51,393.89	38.31	0.1%	732,019.07	731,380.60	638.47	0.1%
<b>Rate 110 - Average Ind. Firm - 75% LF</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>						
				(A) - (B)	%	<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
6.1	VOLUME	m <sup>3</sup>	9,976,120	9,976,120	0	0.0%	69,832,850	69,832,850	0	0.0%
6.2	CUSTOMER CHG.	\$	7,722.60	7,722.60	0.00	0.0%	8,185.32	8,185.32	0.00	0.0%
6.3	DISTRIBUTION CHG.	\$	208,518.34	207,879.86	638.47	0.3%	1,149,601.84	1,145,132.53	4,469.30	0.4%
6.4	LOAD BALANCING	\$	463,740.76	463,740.76	0.00	0.0%	3,123,393.62	3,123,393.62	0.00	0.0%
6.5	SALES COMMDTY	\$	1,312,760.55	1,312,760.55	0.00	0.0%	9,189,325.19	9,189,325.19	0.00	0.0%
6.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
6.7	TOTAL SALES	\$	1,992,742.25	1,992,103.78	638.47	0.0%	13,470,505.97	13,466,036.67	4,469.30	0.0%
6.8	TOTAL T-SERVICE	\$	679,981.70	679,343.23	638.47	0.1%	4,281,180.78	4,276,711.48	4,469.30	0.1%
<b>Rate 115 - Large Ind. Firm - 80% LF</b>										
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>						
				(A) - (B)	%	<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	

**EGD RATE ZONE**

**ANNUAL BILL COMPARISON - LARGE VOLUME CUSTOMERS**  
**INCLUDING FEDERAL CARBON PRICING IMPACTS FOR EPS PARTICIPANTS AND RIDER K BILL 32**

**(A) EB-2023-0211 Inclusive of 2024 Federal Carbon Pricing vs (B) EB-2023-0211 Inclusive of 2023 Federal Carbon Pricing**

Item No.		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
		<b>Rate 135 - Seasonal Firm</b>				<b>Rate 170 - Average Ind. Interr. - 50% LF</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
7.1	VOLUME	m <sup>3</sup>	598,567	598,567	0	0.0%	9,976,121	9,976,121	0	0.0%
7.2	CUSTOMER CHG.	\$	1,522.68	1,522.68	0.00	0.0%	3,678.60	3,678.60	0.00	0.0%
7.3	DISTRIBUTION CHG.	\$	12,975.31	12,937.00	38.31	0.3%	81,860.87	81,222.40	638.47	0.8%
7.4	LOAD BALANCING	\$	21,111.92	21,111.92	0.00	0.0%	342,777.75	342,777.75	0.00	0.0%
7.5	SALES COMMDTY	\$	78,811.47	78,811.47	0.00	0.0%	1,312,760.66	1,312,760.66	0.00	0.0%
7.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
7.7	TOTAL SALES	\$	114,421.38	114,383.07	38.31	0.0%	1,741,077.89	1,740,439.41	638.47	0.0%
7.8	TOTAL T-SERVICE	\$	35,609.91	35,571.61	38.31	0.1%	428,317.23	427,678.75	638.47	0.1%

		<b>Rate 170 - Average Ind. Interr. - 75% LF</b>				<b>Rate 170 - Large Ind. Interr. - 75% LF</b>				
		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		<b>(A)</b>	<b>(B)</b>	<b>CHANGE</b>		
				(A) - (B)	%			(A) - (B)	%	
8.1	VOLUME	m <sup>3</sup>	9,976,120	9,976,120	0	0.0%	69,832,850	69,832,850	0	0.0%
8.2	CUSTOMER CHG.	\$	3,678.60	3,678.60	0.00	0.0%	3,678.60	3,678.60	0.00	0.0%
8.3	DISTRIBUTION CHG.	\$	73,856.48	73,218.00	638.47	0.9%	399,104.57	394,635.27	4,469.30	1.1%
8.4	LOAD BALANCING	\$	342,777.72	342,777.72	0.00	0.0%	2,399,444.38	2,399,444.38	0.00	0.0%
8.5	SALES COMMDTY	\$	1,312,760.53	1,312,760.53	0.00	0.0%	9,189,325.02	9,189,325.02	0.00	0.0%
8.6	FEDERAL CARBON CHARGE	\$	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
8.7	TOTAL SALES	\$	1,733,073.32	1,732,434.85	638.47	0.0%	11,991,552.57	11,987,083.27	4,469.30	0.0%
8.8	TOTAL T-SERVICE	\$	420,312.79	419,674.32	638.47	0.2%	2,802,227.55	2,797,758.25	4,469.30	0.2%

ENBRIDGE GAS INC.  
 EGD Rate Zone  
TABLE 5: SUMMARY OF 2022 FEDERAL CARBON DEFERRAL AND VARIANCE ACCOUNTS

		Col. 1	Col. 2	Col. 3	Col. 4
Line	Rate	Customer Carbon Charge - Variance Account <sup>1</sup>	Facility Carbon Charge Variance Account <sup>1</sup>	Greenhouse Gas Emissions Administration Deferral Account <sup>1</sup>	Total
		(\$000's)	(\$000's)	(\$000's)	(Col. 1 + Col. 2 + Col. 3) (\$000's)
1.1	Balance	-	(253)	2,498	2,245
1.2	Interest	-	(42)	179	137
1	Total	-	(295)	2,676	2,382

Notes:

(1) Exhibit C, Tab 1, Schedule 1.

ENBRIDGE GAS INC.  
EGD Rate Zone

TABLE 6: SUMMARY OF ALLOCATION OF 2022 FEDERAL CARBON DEFERRAL AND VARIANCE ACCOUNTS

	Col. 1	Col. 2	Col. 3	Col. 4	
Line	Rate	Customer Carbon Charge - Variance Account <sup>1</sup>	Facility Carbon Charge Variance Account <sup>2</sup>	Greenhouse Gas Emissions Administration Deferral Account <sup>3</sup>	Total
		(\$000's)	(\$000's)	(\$000's)	(Col. 1 + Col. 2 + Col. 3) (\$000's)
1.1	1	-	(98)	2,475	2,377
1.2	6	-	(92)	201	108
1.3	9	-	0	0	0
1.4	100	-	(1)	0	(1)
1.5	110	-	(23)	0	(23)
1.6	115	-	(8)	0	(8)
1.7	125	-	(14)	0	(14)
1.8	135	-	(1)	0	(1)
1.9	145	-	(0)	0	(0)
1.10	170	-	(6)	0	(6)
1.11	200	-	(4)	0	(4)
1.12	300	-	(0)	0	(0)
1.13	315	-	0	0	0
1.14	332	-	(48)	0	(48)
1	Total	-	(295)	2,676	2,382

Notes:

- (1) Exhibit D, Tab 2, Schedule 4, Page 1, Table 7.
- (2) Exhibit D, Tab 2, Schedule 4, Page 2, Table 8.
- (3) Exhibit D, Tab 2, Schedule 4, Page 3, Table 9.



ENBRIDGE GAS INC.  
 EGD Rate Zone  
TABLE 7: 2022 CUSTOMER CARBON CHARGE - VARIANCE ACCOUNT CLEARANCE UNIT RATES

		Col. 1	Col. 2	Col. 3
Line	Rate	Balance to be Cleared <sup>1</sup>	Interest <sup>2</sup>	Total Balance to be Cleared <sup>3</sup>
		(\$000's)	(\$000's)	(Col. 1 + Col. 2) (\$000's)
1.1	1	-	-	-
1.2	6	-	-	-
1.3	9	-	-	-
1.4	100	-	-	-
1.5	110	-	-	-
1.6	115	-	-	-
1.7	125	-	-	-
1.8	135	-	-	-
1.9	145	-	-	-
1.10	170	-	-	-
1.11	200	-	-	-
1.12	300	-	-	-
1.13	315	-	-	-
1.14	332	-	-	-
1	Total	-	-	-

Notes:

- (1) The balance by rate class = The total balance in Line 1, Col. 1 x (volume for each rate class in Col. 4 / total volume in Line 1, Col. 4).
- (2) The interest amount by rate class = The total interest in Line 1, Col. 2 x (the balance for each rate class in Col. 1 / the total balance in Line 1, Col. 1).
- (3) Exhibit D, Tab 2, Schedule 3, Page 1, Line 1, Col. 1.

ENBRIDGE GAS INC.

EGD Rate Zone

TABLE 8: 2022 FACILITY CARBON CHARGE - VARIANCE ACCOUNT CLEARANCE UNIT RATES

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	
Line	Rate	Balance to be Cleared <sup>1</sup>	Interest <sup>2</sup>	Total Balance to be Cleared <sup>3</sup>	Actual Volumes (Jan - Dec 2022)	Unit Rate
		(\$000's)	(\$000's)	(Col. 1 + Col. 2) (\$000's)	(10 <sup>3</sup> m <sup>3</sup> )	(Col. 3 / Col. 4) (¢/m <sup>3</sup> )
1.1	1	(84)	(14)	(98)	5,106,314	(0.0019)
1.2	6	(79)	(13)	(92)	4,787,677	(0.0019)
1.3	9	0	0	0	0	0.0000
1.4	100	(1)	(0)	(1)	36,815	(0.0019)
1.5	110	(20)	(3)	(23)	1,197,877	(0.0019)
1.6	115	(7)	(1)	(8)	400,995	(0.0019)
1.7	125	(12)	(2)	(14)	707,660	(0.0019)
1.8	135	(1)	(0)	(1)	59,020	(0.0019)
1.9	145	(0)	(0)	(0)	18,909	(0.0019)
1.10	170	(5)	(1)	(6)	291,964	(0.0019)
1.11	200	(3)	(1)	(4)	187,361	(0.0019)
1.12	300	(0)	(0)	(0)	269	(0.0019)
1.13	315	0	0	0	0	0.0000
1.14	332	(42)	(7)	(48)	2,516,058	(0.0019)
1	Total	(253)	(42)	(295)	15,310,921	

Notes:

- (1) The balance by rate class = The total balance in Line 1, Col. 1 x (volume for each rate class in Col. 4 / total volume in Line 1, Col. 4).  
(2) The interest amount by rate class = The total interest in Line 1, Col. 2 x (the balance for each rate class in Col. 1 / the total balance in Line 1, Col. 1).  
(3) Exhibit D, Tab 2, Schedule 3, Page 1, Line 1, Col. 2.

ENBRIDGE GAS INC.

EGD Rate Zone

TABLE 9: 2022 GREENHOUSE GAS EMISSIONS ADMINISTRATION DEFERRAL ACCOUNT CLEARANCE UNIT RATES

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	
Line	Rate	2022 Number of Customers	Balance to be Cleared <sup>1</sup>	Interest <sup>2</sup>	Total Balance to be Cleared <sup>3</sup>	Actual Volumes (Jan - Dec 2022)	Unit Rate
			(\$000's)	(\$000's)	(Col. 2 + Col. 3) (\$000's)	(10 <sup>3</sup> m <sup>3</sup> )	(Col. 4 / Col. 5) (¢/m <sup>3</sup> )
1.1	1	2,098,227	2,310	165	2,475	5,106,314	0.0485
1.2	6	169,962	187	13	201	4,787,677	0.0042
1.3	9	2	0	0	0	0	0.0000
1.4	100	16	0	0	0	36,815	0.0001
1.5	110	415	0	0	0	1,197,877	0.0000
1.6	115	17	0	0	0	400,995	0.0000
1.7	125	4	0	0	0	707,660	0.0000
1.8	135	42	0	0	0	59,020	0.0001
1.9	145	20	0	0	0	18,909	0.0001
1.10	170	23	0	0	0	291,964	0.0000
1.11	200	1	0	0	0	187,361	0.0000
1.12	300	2	0	0	0	269	0.0009
1.13	315	0	0	0	0	0	0.0000
1.14	332	1	0	0	0	2,516,058	0.0000
1	Total	2,268,732	2,498	179	2,676	15,310,921	

Notes:

(1) The balance by rate class = The total balance in Line 1, Col. 2 x (number of customer for each rate class in Col. 1 / total number of customer in Line 1, Col. 1).

(2) The interest amount by rate class = The total interest in Line 1, Col. 3 x (the balance for each rate class in Col. 2 / the total balance in Line 1, Col. 2).

(3) Exhibit D, Tab 2, Schedule 3, Page 1, Line 1, Col. 3.

ENBRIDGE GAS INC.  
 EGD Rate Zone  
TABLE 10: 2022 FEDERAL CARBON DEFERRAL AND VARIANCE ACCOUNT CLEARANCE  
UNIT RATE SUMMARY BY RATE CLASS

The following adjustment is applicable to consumption volumes for the period January 1 to December 31, 2022.

Rate Class	Non-EPS Unit Rate (¢/m <sup>3</sup> )	EPS <sup>1</sup> Unit Rate (¢/m <sup>3</sup> )
Rate 1	0.0466	0.0466
Rate 6	0.0023	0.0023
Rate 9	0.0000	0.0000
Rate 100	(0.0018)	(0.0018)
Rate 110	(0.0019)	(0.0019)
Rate 115	(0.0019)	(0.0019)
Rate 125	(0.0019)	(0.0019)
Rate 135	(0.0018)	(0.0018)
Rate 145	(0.0018)	(0.0018)
Rate 170	(0.0019)	(0.0019)
Rate 200	(0.0019)	(0.0019)
Rate 300	(0.0010)	(0.0010)
Rate 300 Interruptible	(0.0010)	(0.0010)
Rate 315	0.0000	0.0000
Rate 332	(0.0019)	(0.0019)

(1) Includes Voluntary Participants and Other Exempt Gas Volumes.

ENBRIDGE GAS INC.

EGD Rate Zone

TABLE 11: 2022 FEDERAL CARBON DEFERRAL AND VARIANCE ACCOUNT CLEARANCE  
UNIT RATE BREAKDOWN BY RATE CLASS

The following adjustment is applicable to consumption volumes for the period January 1 to December 31, 2022.

Rate Class		Non-EPS (¢/m <sup>3</sup> )	EPS <sup>1</sup> (¢/m <sup>3</sup> )
Rate 1	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0485</u>	<u>0.0485</u>
	Total	0.0466	0.0466
Rate 6	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0042</u>	<u>0.0042</u>
	Total	0.0023	0.0023
Rate 9	Customer-Related	0.0000	
	Facility-Related	0.0000	0.0000
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	0.0000	0.0000
Rate 100	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0001</u>	<u>0.0001</u>
	Total	(0.0018)	(0.0018)
Rate 110	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)

Rate Class		Non-EPS (¢/m <sup>3</sup> )	EPS <sup>1</sup> (¢/m <sup>3</sup> )
Rate 115	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)
Rate 125	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)
Rate 135	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0001</u>	<u>0.0001</u>
	Total	(0.0018)	(0.0018)
Rate 145	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0001</u>	<u>0.0001</u>
	Total	(0.0018)	(0.0018)
Rate 170	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)
Rate 200	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)

Rate Class		Non-EPS (¢/m <sup>3</sup> )	EPS <sup>1</sup> (¢/m <sup>3</sup> )
Rate 300	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0009</u>	<u>0.0009</u>
	Total	(0.0010)	(0.0010)
Rate 300 Interruptible	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0009</u>	<u>0.0009</u>
	Total	(0.0010)	(0.0010)
Rate 315	Customer-Related	0.0000	
	Facility-Related	0.0000	0.0000
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	0.0000	0.0000
Rate 332	Customer-Related	0.0000	
	Facility-Related	(0.0019)	(0.0019)
	<u>GGEADA</u>	<u>0.0000</u>	<u>0.0000</u>
	Total	(0.0019)	(0.0019)

(1) Includes Voluntary Participants and Other Exempt Gas Volumes.

ENBRIDGE GAS INC.  
EGD Rate Zone  
2022 FEDERAL CARBON DEFERRAL AND VARIANCE ACCOUNT CLEARANCE  
Bill Adjustment for April 2024 for Typical Customers

Filed: 2023-09-28  
EB-2023-0196  
Exhibit D  
Tab 2  
Schedule 5  
Page 1 of 1

Item No.	Col. 1	Col. 2	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13
		Volume	Annual Bill Impact for Non-EPS				Annual Bill Impact for EPS					
		Annual	Unit Rate	Total Adjustment	October 2023 Bill	October 2023 Bill Including Total Adjustment	% Impact	Unit Rate	Total Adjustment	October 2023 Bill	October 2023 Bill Including Total Adjustment	% Impact
		m <sup>3</sup>	¢/m <sup>3</sup>	\$	\$	\$	%	¢/m <sup>3</sup>	\$	\$	\$	%
<b>GENERAL SERVICE</b>												
1.1	<b>RATE 1 RESIDENTIAL</b>											
1.2	Heating & Water Heating	2,400	0.0466	1.12	1,256	1,257	0.1%	0.0466	1.12	959	960	0.1%
2.1	<b>RATE 6 COMMERCIAL</b>											
2.2	Commercial - Heating & Other Uses	22,606	0.0023	0.52	9,705	9,705	0.0%	0.0023	0.52	6,904	6,904	0.0%
2.3	General Use	43,285	0.0023	1.00	17,490	17,491	0.0%	0.0023	1.00	12,127	12,128	0.0%
<b>CONTRACT SERVICE</b>												
3.1	<b>RATE 100</b>											
3.2	Industrial - small size	339,188	(0.0018)	(6.11)	122,716	122,710	0.0%	(0.0018)	(6.11)	80,691	80,685	0.0%
4.1	<b>RATE 110</b>											
4.2	Industrial - small size, 50% LF	598,568	(0.0019)	(11.37)	204,322	204,311	0.0%	(0.0019)	(11.37)	130,160	130,148	0.0%
4.3	Industrial - avg. size, 75% LF	9,976,121	(0.0019)	(189.55)	3,228,145	3,227,956	0.0%	(0.0019)	(189.55)	1,992,104	1,991,914	0.0%
5.1	<b>RATE 115</b>											
5.2	Industrial - large size, 80% LF	69,832,850	(0.0019)	(1,326.82)	22,118,327	22,117,000	0.0%	(0.0019)	(1,326.82)	13,466,037	13,464,710	0.0%
6.1	<b>RATE 135</b>											
6.2	Industrial - Seasonal Firm	598,567	(0.0018)	(10.77)	188,546	188,535	0.0%	(0.0018)	(10.77)	114,383	114,372	0.0%
7.1	<b>RATE 145</b>											
7.2	Commercial - avg. size	598,568	(0.0018)	(10.77)	223,372	223,361	0.0%	(0.0018)	(10.77)	149,209	149,198	0.0%
8.1	<b>RATE 170</b>											
8.2	Industrial - avg. size, 75% LF	9,976,120	(0.0019)	(189.55)	2,968,476	2,968,287	0.0%	(0.0019)	(189.55)	1,732,435	1,732,245	0.0%

Notes:

- Col. 5 = Col. 3 x Col. 4 / 100.
- Col. 6 is the approved October 2023 annual bill for Sales Service customer from EB-2023-0211, Exhibit C, Tab 4, Schedule 7.
- Col. 7 = Col. 5 + Col. 6.
- Col. 8 = Col. 5 / Col. 6.
- Col. 10 = Col. 3 x Col. 9 / 100.
- Col. 11 is the approved October 2023 annual bill for Sales Service customer from EB-2023-0211, Exhibit C, Tab 4, Schedule 8.
- Col. 12 = Col. 10 + Col. 11.
- Col. 13 = Col. 10 / Col. 11.



**ENBRIDGE GAS INC.**  
 Union Rate Zones  
 2024 Customer-Related Volumes and Derivation of Federal Carbon Charge Unit Rate  
 Effective April 1, 2024

Line No	Rate Class	Forecast Volumes (10 <sup>3</sup> m <sup>3</sup> ) (1) (a)	Less: Transportation Volumes (10 <sup>3</sup> m <sup>3</sup> ) (b)	Customer-Related Forecast Volumes (10 <sup>3</sup> m <sup>3</sup> ) (2) (c) = (a - b)	EPS Participant & Other Exempt Volumes (10 <sup>3</sup> m <sup>3</sup> ) (3) (d)	Net Volumes (10 <sup>3</sup> m <sup>3</sup> ) (e) = (c - d)	Federal Carbon Charge (\$/m <sup>3</sup> ) (4) (f)	Federal Carbon Cost (\$) (g) = (e * f * 1000)	Federal Carbon Charge Unit Rate (¢/m <sup>3</sup> ) (h) = (g/(e*1000))*100
Union South In-Franchise Delivery									
1	Rate M1	3,269,019	-	3,269,019	2,404	3,266,616	0.1525	498,158,866	
2	Rate M2	1,322,588	-	1,322,588	90,889	1,231,698	0.1525	187,834,006	
3	Rate M4	588,002	-	588,002	224,917	363,085	0.1525	55,370,483	
4	Rate M5	59,033	-	59,033	14,958	44,075	0.1525	6,721,442	
5	Rate M7	787,495	-	787,495	586,773	200,722	0.1525	30,610,047	
6	Rate M9	96,860	-	96,860	96,860	-	0.1525	-	
7	Rate M10	-	-	-	-	-	0.1525	-	
8	Rate T1	415,185	-	415,185	334,795	80,390	0.1525	12,259,439	
9	Rate T2	5,144,604	-	5,144,604	5,110,151	34,454	0.1525	5,254,197	
10	Rate T3	278,032	-	278,032	278,032	-	0.1525	-	
11	Total Union South In-Franchise	11,960,818	-	11,960,818	6,739,779	5,221,039		796,208,479	
Union North In-Franchise Delivery									
12	Rate 01	991,715	-	991,715	312	991,403	0.1525	151,188,973	
13	Rate 10	328,079	-	328,079	10,654	317,426	0.1525	48,407,401	
14	Rate 20	857,126	-	857,126	721,209	135,917	0.1525	20,727,317	
15	Rate 25	252,236	-	252,236	237,495	14,741	0.1525	2,247,964	
16	Rate 100	1,043,637	-	1,043,637	982,288	61,349	0.1525	9,355,784	
17	Total Union North In-Franchise	3,472,794	-	3,472,794	1,951,958	1,520,836		231,927,439	
18	Total In-Franchise	15,433,612	-	15,433,612	8,691,737	6,741,875		1,028,135,918	
Ex-Franchise									
19	Rate M12 - Firm Transportation	9,967,707	9,967,707	-	-	-	0.1525	-	
20	Rate M13	69,036	69,036	-	-	-	0.1525	-	
21	Rate M16	293,376	293,376	-	-	-	0.1525	-	
22	Rate M17	29,685	29,685	-	-	-	0.1525	-	
23	Rate C1 - Firm Transportation	8,990,841	8,990,841	-	-	-	0.1525	-	
24	Total Ex-Franchise	19,350,646	19,350,646	-	-	-		-	
25	Total In-Franchise & Ex-Franchise	34,784,258	19,350,646	15,433,612	8,691,737	6,741,875		1,028,135,918	15.2500

**Notes:**

- (1) Exhibit B, Tab 3, Schedule 2, Col. 1 + ex-franchise forecast volumes.
- (2) Exhibit B, Tab 3, Schedule 2, Col. 1.
- (3) Exhibit B, Tab 3, Schedule 2, Col. 2.
- (4) Exhibit B, Tab 3, Schedule 6, Line 2.

ENBRIDGE GAS INC.  
 Union Rate Zones  
 Derivation of 2024 Facility Carbon Charge  
Effective April 1, 2024

Line No.	Particulars	Enbridge Gas Combined
1	Total Facility Carbon Cost (\$000's)	7,137 <sup>1</sup>
2	2024 Forecast Volumes (10 <sup>3</sup> m <sup>3</sup> )	49,923,705 <sup>2</sup>
3	Facility Carbon Charge (cents / m <sup>3</sup> ) (line 1 / line 2 * 100)	0.0143
4	Facility Carbon Charge (\$/GJ) (line 3 / Heat Value * 10) <sup>x</sup>	0.004 <sup>3</sup>

Notes:

- (1) Exhibit B, Tab 2, Schedule 6, Line 12/1000 + Exhibit B, Tab 3, Schedule 6, Line 12/1000
- (2) Exhibit D, Tab 2, Schedule 1, Page 1, Column 1, Line 1 + Exhibit D, Tab 3, Schedule 1, Column (a), Line 25
- (3) Per Exhibit D, Tab 1, Schedule 1, the common Facility Carbon Charge is applicable to all customers.  
 Conversion to GJs based on heat value adjustment of 39.17 GJ/10<sup>3</sup>m<sup>3</sup>.

ENBRIDGE GAS INC.  
Union Rates Zone  
2024 Carbon Charge Unit Rate Summary  
Effective April 1, 2024

<u>Line No.</u>	<u>Particulars (¢/m<sup>3</sup>)</u>	<u>Unit Rate</u> (a)
1	Federal Carbon Charge	15.2500 (1)
2	Facility Carbon Charge	0.0143 (2)
3	Total (line 1 + line 2)	<u><u>15.2643</u></u>

Notes:

- (1) Exhibit D, Tab 3, Schedule 1, p. 1, line 25, column (h).
- (2) Exhibit D, Tab 3, Schedule 1, p. 2, line 3, column (c).

ENBRIDGE GAS INC.  
Union Rate Zones  
Union North In-Franchise  
Calculation of 2024 Sales Service and Direct Purchase Bill Impacts for Typical Small and Large Customers

Line No.	Particulars	Approved - EB-2023-0211		Proposed - EB-2023-0196			Bill Impact	
		Total Bill	Unit Rate	Total Bill	Unit Rate	Total Bill Change	Including Federal Carbon Charge	Excluding Federal Carbon Charge
		(\$)	(cents/m <sup>3</sup> )	(\$)	(cents/m <sup>3</sup> )	(\$)	(%)	(%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)	(g)
<u>Small Rate 01</u>								
1	Delivery Charges	526	23.9014	526	23.9000	(0.03)	0.0%	0.0%
2	Federal Carbon Charge	273	12.3900	336	15.2500	62.94	23.1%	0.0%
3	Gas Supply Charges (1)	533	24.2200	533	24.2200	-	0.0%	0.0%
4	Total Bill	1,331	60.5109	1,394	63.3705	62.91	4.7%	0.0%
5	Sales Service Impact					62.91	4.7%	0.0%
6	Bundled-T (Direct Purchase) Impact					62.91	6.4%	0.0%
<u>Small Rate 10</u>								
7	Delivery Charges	6,079	10.1315	6,078	10.1296	(1)	0.0%	0.0%
8	Federal Carbon Charge	7,434	12.3900	9,150	15.2500	1,716	23.1%	0.0%
9	Gas Supply Charges (1)	13,500	22.4998	13,500	22.4998	-	0.0%	0.0%
10	Total Bill	27,013	45.0213	28,728	47.8794	1,715	6.3%	0.0%
11	Sales Service Impact					1,715	6.3%	0.0%
12	Bundled-T (Direct Purchase) Impact					1,715	9.9%	0.0%
<u>Large Rate 10</u>								
13	Delivery Charges	20,106	8.0422	20,101	8.0403	(5)	0.0%	0.0%
14	Federal Carbon Charge	30,975	12.3900	38,125	15.2500	7,150	23.1%	0.0%
15	Gas Supply Charges (1)	56,250	22.4998	56,250	22.4998	-	0.0%	0.0%
16	Total Bill	107,330	42.9320	114,475	45.7901	7,145	6.7%	0.0%
17	Sales Service Impact					7,145	6.7%	0.0%
18	Bundled-T (Direct Purchase) Impact					7,145	10.6%	0.0%
<u>Small Rate 20</u>								
19	Delivery Charges	94,669	3.1556	94,612	3.1537	(57)	-0.1%	-0.1%
20	Federal Carbon Charge	371,700	12.3900	457,500	15.2500	85,800	23.1%	0.0%
21	Gas Supply Charges (1)	536,155	17.8718	536,155	17.8718	-	0.0%	0.0%
22	Total Bill	1,002,524	33.4175	1,088,267	36.2756	85,743	8.6%	0.0%
23	Sales Service Impact					85,743	8.6%	0.0%
24	Bundled-T (Direct Purchase) Impact					85,743	15.9%	0.0%
<u>Large Rate 20</u>								
25	Delivery Charges	369,182	2.4612	368,897	2.4593	(285)	-0.1%	-0.1%
26	Federal Carbon Charge	1,858,500	12.3900	2,287,500	15.2500	429,000	23.1%	0.0%
27	Gas Supply Charges (1)	2,629,807	17.5320	2,629,807	17.5320	-	0.0%	0.0%
28	Total Bill	4,857,489	32.3833	5,286,204	35.2414	428,715	8.8%	0.0%
29	Sales Service Impact					428,715	8.8%	0.0%
30	Bundled-T (Direct Purchase) Impact					428,715	16.9%	0.0%
<u>Average Rate 25</u>								
31	Delivery Charges	79,025	3.4736	78,981	3.4717	(43)	-0.1%	-0.1%
32	Federal Carbon Charge	281,873	12.3900	346,938	15.2500	65,065	23.1%	0.0%
33	Gas Supply Charges (1)	375,031	16.4849	375,031	16.4849	-	0.0%	0.0%
34	Total Bill	735,928	32.3485	800,950	35.2066	65,022	8.8%	0.0%
35	Sales Service Impact					65,022	8.8%	0.0%
36	T-Service (Direct Purchase) Impact					65,022	18.0%	-0.1%
<u>Small Rate 100</u>								
37	Delivery Charges	340,651	1.2617	340,138	1.2598	(513)	-0.2%	-0.2%
38	Federal Carbon Charge	3,345,300	12.3900	4,117,500	15.2500	772,200	23.1%	0.0%
39	Gas Supply Charges (1)	5,377,033	19.9149	5,377,033	19.9149	-	0.0%	0.0%
40	Total Bill	9,062,984	33.5666	9,834,671	36.4247	771,687	8.5%	0.0%
41	Sales Service Impact					771,687	8.5%	0.0%
42	T-Service (Direct Purchase) Impact					771,687	20.9%	-0.2%
<u>Large Rate 100</u>								
43	Delivery Charges	2,781,394	1.1589	2,776,834	1.1570	(4,560)	-0.2%	-0.2%
44	Federal Carbon Charge	29,736,000	12.3900	36,600,000	15.2500	6,864,000	23.1%	0.0%
45	Gas Supply Charges (1)	47,331,576	19.7215	47,331,576	19.7215	-	0.0%	0.0%
46	Total Bill	79,848,970	33.2704	86,708,410	36.1285	6,859,440	8.6%	0.0%
47	Sales Service Impact					6,859,440	8.6%	0.0%
48	T-Service (Direct Purchase) Impact					6,859,440	21.1%	-0.2%

Notes:

(1) Gas Supply charges based on Union North East Zone.

ENBRIDGE GAS INC.  
 Union Rate Zones  
 Union South In-Franchise  
 Calculation of 2024 Sales Service and Direct Purchase Bill Impacts for Typical Small and Large Customers

Line No.	Particulars	Approved - EB-2023-0211		Proposed - EB-2023-0196			Bill Impact	
		Total Bill	Unit Rate	Total Bill	Unit Rate	Total Bill Change	Including Federal Carbon Charge	Excluding Federal Carbon Charge
		(\$)	(cents/m <sup>3</sup> )	(\$)	(cents/m <sup>3</sup> )	(\$)	(%)	(%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)	(g)
<u>Small Rate M1</u>								
1	Delivery Charges	444	20.1655	444	20.1641	(0.03)	0.0%	0.0%
2	Federal Carbon Charge	273	12.3900	336	15.2500	62.94	23.1%	0.0%
3	Gas Supply Charges	346	15.7273	346	15.7273	-	0.0%	0.0%
4	Total Bill	<u>1,062</u>	<u>48.2823</u>	<u>1,125</u>	<u>51.1418</u>	<u>62.91</u>	<u>5.9%</u>	<u>0.0%</u>
5	Sales Service Impact					62.91	5.9%	0.0%
6	Direct Purchase Impact					62.91	8.8%	0.0%
<u>Small Rate M2</u>								
7	Delivery Charges	5,082	8.4697	5,081	8.4678	(1)	0.0%	0.0%
8	Federal Carbon Charge	7,434	12.3900	9,150	15.2500	1,716	23.1%	0.0%
9	Gas Supply Charges	9,436	15.7273	9,436	15.7273	-	0.0%	0.0%
10	Total Bill	<u>21,952</u>	<u>36.5870</u>	<u>23,667</u>	<u>39.4451</u>	<u>1,715</u>	<u>7.8%</u>	<u>0.0%</u>
11	Sales Service Impact					1,715	7.8%	0.0%
12	Direct Purchase Impact					1,715	13.7%	0.0%
<u>Large Rate M2</u>								
13	Delivery Charges	17,384	6.9535	17,379	6.9516	(5)	0.0%	0.0%
14	Federal Carbon Charge	30,975	12.3900	38,125	15.2500	7,150	23.1%	0.0%
15	Gas Supply Charges	39,318	15.7273	39,318	15.7273	-	0.0%	0.0%
16	Total Bill	<u>87,677</u>	<u>35.0708</u>	<u>94,822</u>	<u>37.9289</u>	<u>7,145</u>	<u>8.1%</u>	<u>0.0%</u>
17	Sales Service Impact					7,145	8.1%	0.0%
18	Direct Purchase Impact					7,145	14.8%	0.0%
<u>Small Rate M4</u>								
19	Delivery Charges	57,456	6.5664	57,439	6.5645	(17)	0.0%	0.0%
20	Federal Carbon Charge	108,413	12.3900	133,438	15.2500	25,025	23.1%	0.0%
21	Gas Supply Charges	137,614	15.7273	137,614	15.7273	-	0.0%	0.0%
22	Total Bill	<u>303,482</u>	<u>34.6837</u>	<u>328,491</u>	<u>37.5418</u>	<u>25,008</u>	<u>8.2%</u>	<u>0.0%</u>
23	Sales Service Impact					25,008	8.2%	0.0%
24	Direct Purchase Impact					25,008	15.1%	0.0%
<u>Large Rate M4</u>								
25	Delivery Charges	460,937	3.8411	460,709	3.8392	(228)	0.0%	0.0%
26	Federal Carbon Charge	1,486,800	12.3900	1,830,000	15.2500	343,200	23.1%	0.0%
27	Gas Supply Charges	1,887,276	15.7273	1,887,276	15.7273	-	0.0%	0.0%
28	Total Bill	<u>3,835,013</u>	<u>31.9584</u>	<u>4,177,985</u>	<u>34.8165</u>	<u>342,972</u>	<u>8.9%</u>	<u>0.0%</u>
29	Sales Service Impact					342,972	8.9%	0.0%
30	Direct Purchase Impact					342,972	17.6%	0.0%
<u>Small Rate M5</u>								
31	Delivery Charges	38,515	4.6685	38,500	4.6666	(16)	0.0%	0.0%
32	Federal Carbon Charge	102,218	12.3900	125,813	15.2500	23,595	23.1%	0.0%
33	Gas Supply Charges	129,750	15.7273	129,750	15.7273	-	0.0%	0.0%
34	Total Bill	<u>270,483</u>	<u>32.7858</u>	<u>294,062</u>	<u>35.6439</u>	<u>23,579</u>	<u>8.7%</u>	<u>0.0%</u>
35	Sales Service Impact					23,579	8.7%	0.0%
36	Direct Purchase Impact					23,579	16.8%	0.0%
<u>Large Rate M5</u>								
37	Delivery Charges	224,980	3.4612	224,857	3.4593	(124)	-0.1%	-0.1%
38	Federal Carbon Charge	805,350	12.3900	991,250	15.2500	185,900	23.1%	0.0%
39	Gas Supply Charges	1,022,275	15.7273	1,022,275	15.7273	-	0.0%	0.0%
40	Total Bill	<u>2,052,605</u>	<u>31.5785</u>	<u>2,238,381</u>	<u>34.4366</u>	<u>185,777</u>	<u>9.1%</u>	<u>0.0%</u>
41	Sales Service Impact					185,777	9.1%	0.0%
42	Direct Purchase Impact					185,777	18.0%	-0.1%
<u>Small Rate M7</u>								
43	Delivery Charges	821,316	2.2814	820,632	2.2795	(684)	-0.1%	-0.1%
44	Federal Carbon Charge	4,460,400	12.3900	5,490,000	15.2500	1,029,600	23.1%	0.0%
45	Gas Supply Charges	5,661,828	15.7273	5,661,828	15.7273	-	0.0%	0.0%
46	Total Bill	<u>10,943,544</u>	<u>30.3987</u>	<u>11,972,460</u>	<u>33.2568</u>	<u>1,028,916</u>	<u>9.4%</u>	<u>0.0%</u>
47	Sales Service Impact					1,028,916	9.4%	0.0%
48	Direct Purchase Impact					1,028,916	19.5%	-0.1%
<u>Large Rate M7</u>								
49	Delivery Charges	3,142,228	6.0427	3,141,240	6.0408	(988)	0.0%	0.0%
50	Federal Carbon Charge	6,442,800	12.3900	7,930,000	15.2500	1,487,200	23.1%	0.0%
51	Gas Supply Charges	8,178,196	15.7273	8,178,196	15.7273	-	0.0%	0.0%
52	Total Bill	<u>17,763,224</u>	<u>34.1600</u>	<u>19,249,436</u>	<u>37.0181</u>	<u>1,486,212</u>	<u>8.4%</u>	<u>0.0%</u>
53	Sales Service Impact					1,486,212	8.4%	0.0%
54	Direct Purchase Impact					1,486,212	15.5%	0.0%

**ENBRIDGE GAS INC.**  
 Union Rate Zones  
 Union South In-Franchise  
 Calculation of 2024 Sales Service and Direct Purchase Bill Impacts for Typical Small and Large Customers

Line No.	Particulars	Approved - EB-2023-0211		Proposed - EB-2023-0196		Bill Impact		
		Total Bill	Unit Rate	Total Bill	Unit Rate	Total Bill Change	Including Federal Carbon Charge	Excluding Federal Carbon Charge
		(\$)	(cents/m <sup>3</sup> )	(\$)	(cents/m <sup>3</sup> )	(\$)	(%)	(%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)	(g)
<b>Small Rate M9</b>								
1	Delivery Charges	205,690	2.9596	205,558	2.9577	(132)		-0.1%
2	Gas Supply Charges	1,093,047	15.7273	1,093,047	15.7273	-		0.0%
3	<b>Total Bill</b>	<b>1,298,737</b>	<b>18.6869</b>	<b>1,298,605</b>	<b>18.6850</b>	<b>(132)</b>		<b>0.0%</b>
4	Sales Service Impact					(132)		0.0%
5	Direct Purchase Impact					(132)		-0.1%
<b>Large Rate M9</b>								
6	Delivery Charges	611,036	3.0282	610,653	3.0263	(383)		-0.1%
7	Gas Supply Charges	3,173,455	15.7273	3,173,455	15.7273	-		0.0%
8	<b>Total Bill</b>	<b>3,784,491</b>	<b>18.7555</b>	<b>3,784,108</b>	<b>18.7536</b>	<b>(383)</b>		<b>0.0%</b>
9	Sales Service Impact					(383)		0.0%
10	Direct Purchase Impact					(383)		-0.1%
<b>Average Rate M10</b>								
11	Delivery Charges	8,153	8.6276	8,151	8.6257	(2)		0.0%
12	Gas Supply Charges	14,862	15.7273	14,862	15.7273	-		0.0%
13	<b>Total Bill</b>	<b>23,015</b>	<b>24.3549</b>	<b>23,014</b>	<b>24.3530</b>	<b>(2)</b>		<b>0.0%</b>
14	Sales Service Impact					(2)		0.0%
15	Direct Purchase Impact					(2)		0.0%
<b>Small Rate T1</b>								
16	Delivery Charges	177,585	2.3562	177,442	2.3543	(143)	-0.1%	-0.1%
17	Federal Carbon Charge	933,834	12.3900	1,149,393	15.2500	215,558	23.1%	0.0%
18	Gas Supply Charges	1,185,367	15.7273	1,185,367	15.7273	-	0.0%	0.0%
19	<b>Total Bill</b>	<b>2,296,786</b>	<b>30.4735</b>	<b>2,512,201</b>	<b>33.3316</b>	<b>215,415</b>	<b>9.4%</b>	<b>0.0%</b>
20	Sales Service Impact					215,415	9.4%	0.0%
21	Direct Purchase Impact					215,415	19.4%	-0.1%
<b>Average Rate T1</b>								
22	Delivery Charges	276,165	2.3877	275,946	2.3858	(220)	-0.1%	-0.1%
23	Federal Carbon Charge	1,433,020	12.3900	1,763,806	15.2500	330,786	23.1%	0.0%
24	Gas Supply Charges	1,819,010	15.7273	1,819,010	15.7273	-	0.0%	0.0%
25	<b>Total Bill</b>	<b>3,528,195</b>	<b>30.5050</b>	<b>3,858,761</b>	<b>33.3631</b>	<b>330,566</b>	<b>9.4%</b>	<b>0.0%</b>
26	Sales Service Impact					330,566	9.4%	0.0%
27	Direct Purchase Impact					330,566	19.3%	-0.1%
<b>Large Rate T1</b>								
28	Delivery Charges	622,349	2.4288	621,862	2.4269	(487)	-0.1%	-0.1%
29	Federal Carbon Charge	3,174,824	12.3900	3,907,672	15.2500	732,849	23.1%	0.0%
30	Gas Supply Charges	4,029,976	15.7273	4,029,976	15.7273	-	0.0%	0.0%
31	<b>Total Bill</b>	<b>7,827,148</b>	<b>30.5461</b>	<b>8,559,510</b>	<b>33.4042</b>	<b>732,362</b>	<b>9.4%</b>	<b>0.0%</b>
32	Sales Service Impact					732,362	9.4%	0.0%
33	Direct Purchase Impact					732,362	19.3%	-0.1%
<b>Small Rate T2</b>								
34	Delivery Charges	785,640	1.3258	784,514	1.3239	(1,126)	-0.1%	-0.1%
35	Federal Carbon Charge	7,341,818	12.3900	9,036,540	15.2500	1,694,722	23.1%	0.0%
36	Gas Supply Charges	9,319,369	15.7273	9,319,369	15.7273	-	0.0%	0.0%
37	<b>Total Bill</b>	<b>17,446,827</b>	<b>29.4431</b>	<b>19,140,423</b>	<b>32.3012</b>	<b>1,693,596</b>	<b>9.7%</b>	<b>0.0%</b>
38	Sales Service Impact					1,693,596	9.7%	0.0%
39	Direct Purchase Impact					1,693,596	20.8%	-0.1%
<b>Average Rate T2</b>								
40	Delivery Charges	1,928,348	0.9749	1,924,590	0.9730	(3,758)	-0.2%	-0.2%
41	Federal Carbon Charge	24,506,162	12.3900	30,162,952	15.2500	5,656,790	23.1%	0.0%
42	Gas Supply Charges	31,107,003	15.7273	31,107,003	15.7273	-	0.0%	0.0%
43	<b>Total Bill</b>	<b>57,541,513</b>	<b>29.0922</b>	<b>63,194,545</b>	<b>31.9503</b>	<b>5,653,032</b>	<b>9.8%</b>	<b>0.0%</b>
44	Sales Service Impact					5,653,032	9.8%	0.0%
45	Direct Purchase Impact					5,653,032	21.4%	-0.2%
<b>Large Rate T2</b>								
46	Delivery Charges	3,206,006	0.8663	3,198,974	0.8644	(7,032)	-0.2%	-0.2%
47	Federal Carbon Charge	45,854,027	12.3900	56,438,573	15.2500	10,584,545	23.1%	0.0%
48	Gas Supply Charges	58,205,007	15.7273	58,205,007	15.7273	-	0.0%	0.0%
49	<b>Total Bill</b>	<b>107,265,040</b>	<b>28.9836</b>	<b>117,842,554</b>	<b>31.8417</b>	<b>10,577,514</b>	<b>9.9%</b>	<b>0.0%</b>
50	Sales Service Impact					10,577,514	9.9%	0.0%
51	Direct Purchase Impact					10,577,514	21.6%	-0.2%
<b>Large Rate T3</b>								
52	Delivery Charges	6,483,120	2.3773	6,477,939	2.3754	(5,182)		-0.1%
53	Gas Supply Charges	42,890,234	15.7273	42,890,234	15.7273	-		0.0%
54	<b>Total Bill</b>	<b>49,373,354</b>	<b>18.1046</b>	<b>49,368,173</b>	<b>18.1027</b>	<b>(5,182)</b>		<b>0.0%</b>
55	Sales Service Impact					(5,182)		0.0%
56	Direct Purchase Impact					(5,182)		-0.1%

ENBRIDGE GAS INC.  
 Union Rate Zones  
Summary of 2022 Federal Carbon Deferral and Variance Accounts

Line No.	Particulars (\$000's)	Customer Carbon Charge - Variance Account 179-421 (a)	Facility Carbon Charge - Variance Account 179-420 (b)	Greenhouse Gas Emissions Administration Deferral Account 179-422 (c)	Total (d) = (a+b+c)
1	Balance	-	(2,910)	2,617	(293)
2	Interest	-	(345)	184	(161)
3	Total (1)	-	(3,255)	2,801	(454)

Notes:

(1) Exhibit D, Tab 3, Schedule 3, page 2.

ENBRIDGE GAS INC.  
Union Rate Zones  
Summary of Allocation of 2022 Federal Carbon Deferral and Variance Accounts

Line No.	Particulars (\$000's)	Allocators		Account Balances			Total (f) = (c+d+e)
		Jan - Dec 2022 Total Volumes 10 <sup>3</sup> m <sup>3</sup> (a)	Total 2013 A&G (\$000's) (b)	Customer Carbon Charge - Variance Account 179-421 (c)	Facility Carbon Charge - Variance Account 179-420 (1) (d)	Greenhouse Gas Emissions Administration Deferral Account 179-422 (2) (e)	
<u>Union South In-Franchise</u>							
1	Rate M1	3,183,662	80,159	-	(236)	1,415	1,179
2	Rate M2	1,226,228	7,513	-	(91)	133	42
3	Rate M4	601,877	2,801	-	(45)	49	5
4	Rate M5	60,809	3,131	-	(5)	55	51
5	Rate M7	750,067	787	-	(56)	14	(42)
6	Rate M9	96,890	108	-	(7)	2	(5)
7	Rate M10	331	25	-	(0)	0	0
8	Rate T1	440,944	2,036	-	(33)	36	3
9	Rate T2	4,850,508	5,624	-	(359)	99	(260)
10	Rate T3	278,032	627	-	(21)	11	(10)
11	Total South In-Franchise	11,489,346	102,812	-	(851)	1,815	964
<u>Union North In-Franchise</u>							
12	Rate 01	1,010,936	31,817	-	(75)	562	487
13	Rate 10	320,456	2,759	-	(24)	49	25
14	Rate 20	879,345	2,373	-	(65)	42	(23)
15	Rate 25	151,281	2,089	-	(11)	37	26
16	Rate 100	943,946	953	-	(70)	17	(53)
17	Total North In-Franchise	3,305,964	39,992	-	(245)	706	461
<u>Ex-Franchise</u>							
18	Rate M12	21,734,275	14,918	-	(1,610)	263	(1,347)
19	Rate M13	46,695	0	-	(3)	0	(3)
20	Rate M16	360,721	21	-	(27)	0	(26)
21	Rate M17	25,725	-	-	(2)	-	(2)
22	Rate C1	6,972,242	323	-	(517)	6	(511)
23	Excess Utility Storage Space	-	597	-	-	11	11
24	Total Ex-Franchise	29,139,658	15,859	-	(2,159)	280	(1,879)
25	Total In-Franchise & Ex-Franchise	43,934,968	158,663	-	(3,255)	2,801	(454)

Notes:

- (1) Allocated in proportion to column (a).
- (2) Allocated in proportion to column (b).



ENBRIDGE GAS INC.  
Union Rate Zones  
Unit Rates for One-Time Adjustment - Delivery  
2022 Federal Carbon Deferral and Variance Account Disposition

Line No.	Particulars	Rate Class	Deferral Balance for Disposition (\$000's) (1) (a)	Volume (10 <sup>3</sup> m <sup>3</sup> ) (b)	Unit Rate (cents/m <sup>3</sup> ) (c) = (a / b)*100
<u>Union North</u>					
1	Small Volume General Service	01	487	1,010,936	0.0482
2	Large Volume General Service	10	25	320,456	0.0078
3	Medium Volume Firm Service	20	(23)	879,345	(0.0026)
4	Large Volume Interruptible	25	26	151,281	0.0170
5	Large Volume High Load Factor	100	(53)	943,946	(0.0056)
<u>Union South</u>					
6	Small Volume General Service	M1	1,179	3,183,662	0.0370
7	Large Volume General Service	M2	42	1,226,228	0.0034
8	Firm Com/Ind Contract	M4	5	601,877	0.0008
9	Interruptible Com/Ind Contract	M5	51	60,809	0.0835
10	Special Large Volume Contract	M7	(42)	750,067	(0.0056)
11	Large Wholesale	M9	(5)	96,890	(0.0054)
12	Small Wholesale	M10	0	331	0.1281
13	Contract Carriage Service	T1	3	440,944	0.0007
14	Contract Carriage Service	T2	(260)	4,850,508	(0.0054)
15	Contract Carriage- Wholesale	T3	(10)	278,032	(0.0034)
16	Total		1,425		

Notes:

(1) Exhibit D, Tab 3, Schedule 3, page 2, column (f).

ENBRIDGE GAS INC.  
 Union Rate Zones  
 Ex-Franchise Amounts for Disposition  
2022 Federal Carbon Deferral and Variance Account Disposition

Line No.	Particulars (\$000's) (1)	Rate Class	Deferral Balance for Disposition (\$000's) (2) (a)
1	Storage and Transportation	M12	(1,347)
2	Local Production	M13	(3)
3	Storage Transportation Service	M16	(26)
4	Transportation Service	M17	(2)
5	Short-Term Cross Franchise	C1	<u>(511)</u>
6	Total Ex-Franchise		(1,890)

Notes:

- (1) Exhibit D, Tab 3, Schedule 3, page 2, column (f).
- (2) Ex-franchise M12, M13, M16, M17 and C1 customer specific amounts determined using approved deferral account allocation methodologies.

**ENBRIDGE GAS INC.**  
Union Rate Zones  
Typical Bill Impacts  
2022 Federal Carbon Deferral and Variance Account Disposition

Line No.	Volume	Annual Bill Impact for Non-EPS						Annual Bill Impact for EPS				
		Annual m <sup>3</sup>	Unit Rate (1)	Total Adjustment \$	October 2023 Bill		Impact %	Unit Rate (1) ¢/m <sup>3</sup>	Total Adjustment \$	October 2023 Bill		Impact %
			¢/m <sup>3</sup>		October 2023 Bill (2) \$	Including Total Adjustment \$				October 2023 Bill (2) \$	Including Total Adjustment \$	
(a)	(b)	(c) = (a x b) / 100	(d)	(e) = (d + c)	(f) = (c / d)	(g)	(h) = (a x g) / 100	(i)	(j) = (i + h)	(k) = (h / i)		
<b>GENERAL SERVICE</b>												
<b>Union North</b>												
1	Small Rate 01	2,200	0.0482	1.06	1,331	1,332	0.1%	0.0482	1.06	1,059	1,060	0.1%
2	Small Rate 10	60,000	0.0078	4.68	27,013	27,017	0.0%	0.0078	4.68	19,579	19,583	0.0%
3	Large Rate 10	250,000	0.0078	19.48	107,330	107,350	0.0%	0.0078	19.48	76,355	76,375	0.0%
<b>Union South</b>												
4	Small Rate M1	2,200	0.0370	0.81	1,062	1,063	0.1%	0.0370	0.81	790	790	0.1%
5	Small Rate M2	60,000	0.0034	2.04	21,952	21,954	0.0%	0.0034	2.04	14,518	14,520	0.0%
6	Large Rate M2	250,000	0.0034	8.52	87,677	87,686	0.0%	0.0034	8.52	56,702	56,711	0.0%
<b>CONTRACT SERVICE</b>												
<b>Union North</b>												
7	Small Rate 20	3,000,000	(0.0026)	(79)	1,002,524	1,002,444	0.0%	(0.0026)	(79)	630,824	630,744	0.0%
8	Large Rate 20	15,000,000	(0.0026)	(397)	4,857,489	4,857,092	0.0%	(0.0026)	(397)	2,998,989	2,998,592	0.0%
9	Average Rate 25	2,275,000	0.0170	386	735,928	736,315	0.1%	0.0170	386	454,056	454,442	0.1%
10	Small Rate 100	27,000,000	(0.0056)	(1,519)	9,062,984	9,061,465	0.0%	(0.0056)	(1,519)	5,717,684	5,716,165	0.0%
11	Large Rate 100	240,000,000	(0.0056)	(13,504)	79,848,970	79,835,466	0.0%	(0.0056)	(13,504)	50,112,970	50,099,466	0.0%
<b>Union South</b>												
12	Small Rate M4	875,000	0.0008	7	303,482	303,489	0.0%	0.0008	7	195,070	195,077	0.0%
13	Large Rate M4	12,000,000	0.0008	97	3,835,013	3,835,110	0.0%	0.0008	97	2,348,213	2,348,310	0.0%
14	Small Rate M5 Interruptible	825,000	0.0835	689	270,483	271,172	0.3%	0.0835	689	168,265	168,954	0.4%
15	Large Rate M5 Interruptible	6,500,000	0.0835	5,427	2,052,605	2,058,031	0.3%	0.0835	5,427	1,247,255	1,252,681	0.4%
16	Small Rate M7	36,000,000	(0.0056)	(2,000)	10,943,544	10,941,544	0.0%	(0.0056)	(2,000)	6,483,144	6,481,144	0.0%
17	Large Rate M7	52,000,000	(0.0056)	(2,889)	17,763,224	17,760,335	0.0%	(0.0056)	(2,889)	11,320,424	11,317,535	0.0%
18	Small Rate M9	6,950,000	(0.0054)	(378)				(0.0054)	(378)	1,298,737	1,298,359	0.0%
19	Large Rate M9	20,178,000	(0.0054)	(1,098)				(0.0054)	(1,098)	3,784,491	3,783,393	0.0%
20	Average Rate M10	94,500						0.1281	121	23,015	23,136	0.5%
21	Small Rate T1	7,537,000	0.0007	56	2,296,786	2,296,842	0.0%	0.0007	56	1,362,951	1,363,007	0.0%
22	Average Rate T1	11,565,938	0.0007	86	3,528,195	3,528,281	0.0%	0.0007	86	2,095,175	2,095,261	0.0%
23	Large Rate T1	25,624,080	0.0007	190	7,827,148	7,827,339	0.0%	0.0007	190	4,652,325	4,652,515	0.0%
24	Small Rate T2	59,256,000	(0.0054)	(3,178)	17,446,827	17,443,650	0.0%	(0.0054)	(3,178)	10,105,009	10,101,831	0.0%
25	Average Rate T2	197,789,850	(0.0054)	(10,606)	57,541,513	57,530,907	0.0%	(0.0054)	(10,606)	33,035,351	33,024,745	0.0%
26	Large Rate T2	370,089,000	(0.0054)	(19,845)	107,265,040	107,245,195	0.0%	(0.0054)	(19,845)	61,411,013	61,391,168	0.0%
27	Large Rate T3	272,712,000						(0.0034)	(9,354)	49,373,354	49,364,000	0.0%

**Notes:**

- (1) Unit rates calculated at Exhibit D, Tab 3, Schedule 4.
- (2) Typical annual bill for a sales service customer at approved October 2023 QRAM rates (EB-2023-0211).