



39 Beech St. E  
Aylmer, Ontario  
Canada  
[epcor.com](http://epcor.com)

January 31, 2025

**Sent by EMAIL, RESS e-filing**

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
27-2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Marconi,

**Re: EB-2024-0130: EPCOR Natural Gas Limited Partnership's ("ENGLP")  
Cost of Service Filing – Reply Submission**

---

Please find enclosed ENGLP's comments in response to the submissions of OEB Staff and the Consumers Council of Canada. ENGLP notes that no submission was received from Pollution Probe. The following comments are intended to address specific items and questions received rather than providing a concluding statement or summary beyond what is currently on the record on this proceeding.

Sincerely,

Tim Hesselink, CPA  
Senior Manager, Regulatory Affairs  
EPCOR Natural Gas Limited Partnership  
[thesselink@epcor.com](mailto:thesselink@epcor.com)  
249-225-5104

CC: Intervenors in this proceeding.

**EPCOR Natural Gas Limited Partnership (“ENGLP”)  
2025 – 2029 Cost of Service  
EB-2024-0130  
Aylmer Service Territory  
Reply Submission**

---

**Monthly Load Forecast**

**Reference: CCC Submission, Page 1:**

*CCC has had email correspondence with EPCOR regarding the March-December 2025 monthly volumes used in the forgone revenue and deferral and variance account (DVA) disposition calculations. EPCOR has advised that it will file as part of its reply comments an updated version of the detailed Load Forecast spreadsheet (with a correction to the monthly forecast tab). With this pending update, CCC is satisfied that the monthly volumes used in the relevant calculations are accurate.*

**ENGLP Comments:** ENGLP has included an updated load forecast with this submission (*ENGLP\_EB-2024-0130\_Load Forecast\_20250131*). As stated in the CCC submission, the “Monthly Forecast” tab has been corrected for the R1 Industrial Class as the previous version was mapped incorrectly. This has aligned the data with the volumes used in the calculations for the foregone revenue.

To confirm, the values used for the annual billing determinants along with the monthly foregone revenue calculations in the DRO rate model have not changed as the correct values were used. Only the “Monthly Forecast” tab has been updated in the Load Forecast.

**January-February 2025 Transportation Variances**

**Reference: CCC Submission, Page 1:**

*CCC also agrees with EPCOR’s proposal to implement the approved \$0.0292/m<sup>3</sup> transportation charge on March 1, 2025 with no change and to use the PGTVA to capture any transportation-related variances. CCC asks that EPCOR confirm, in its reply comments, that the January-February 2025 true-up in the PGTVA will be based on the reference price embedded in distribution rates for those months (i.e., \$0.0237/m<sup>3</sup>) and the actual transportation costs.*

**ENGLP Comments:** Confirmed.

**Bill Impacts Presentation**

**Reference: OEB Staff Submission, Page 3:**

*OEB staff takes no issue with the bill impact calculations provided by ENGLP. However, OEB staff notes the updated bill impacts incorporate the 2025 Q1 quarterly commodity rate adjustment impact which were previously approved, and was already communicated to customers at the time that the OEB issued its decision and interim rate order in that proceeding.*

**Reference: CCC Submission, Page 1:**

*With respect to the bill impacts, CCC does not believe that the commodity-related bill impacts resulting from the January 1, 2025 QRAM proceeding should be reflected. The change to the commodity rates (and the associated bill impacts) were approved, and communicated to customers, at the time that the OEB issued its Decision and Interim Rate Order in that proceeding. Therefore, reflecting the commodity-related bill impacts in the current proceeding may lead to customer confusion. CCC does not believe that this change necessarily requires EPCOR to file an updated Draft Rate Order (as this is a bill impact presentment issue – not an issue with the commodity rates in the rate schedules). However, if the OEB intends to communicate the bill impacts resulting from the current proceeding to customers, it should exclude the commodity-related bill impacts in that communication.*

**ENGLP Comments:** On the following page, ENGLP has provided an updated table of bill impacts removing the impact of the change in commodity rate from December 2024 - January 2025. ENGLP recognizes the input from CCC and OEB Staff and will defer to the OEB's direction on this matter, confirming that either option is suitable.

**EB-2024-0130 - 2025 Bill Impacts (Excluding Commodity)**

Rate Class	Change in Commodity Charge (\$ / year / customer)	Change in Commodity Charge (%)	Change in Delivery Charge (\$ / year / customer)	Change in Delivery Charge (%)	Change in Transportation (\$ / year / customer)	Change in Transportation (%)	Change in Rate Riders (\$ / year / customer)	Change in Rate Riders (%)	Change in Total Bill (\$ / year / customer)	Change in Total Bill (%)
R1 - Residential	\$0	0%	\$17	3%	\$7	14%	\$24	149%	\$48	4%
R1 - Residential - Bottom 10 Percentile	\$0	0%	\$35	10%	\$2	14%	\$7	141%	\$44	8%
R1- General Service	\$0	0%	\$56	3%	\$36	14%	\$123	152%	\$215	4%
R1-GS - Commercial	\$0	0%	\$49	4%	\$36	14%	\$123	152%	\$208	4%
R1-GS - Commercial - Bottom 10 Percentile	\$0	0%	\$35	11%	\$2	14%	\$6	138%	\$43	9%
R1-GS - Commercial - Top 10 Percentile	\$0	0%	\$153	3%	\$181	14%	\$617	153%	\$950	4%
R1-GS - Industrial	\$0	0%	\$107	3%	\$115	14%	\$390	153%	\$612	4%
R1-GS - Industrial - Bottom 10 Percentile	\$0	0%	\$34	8%	\$6	14%	\$19		\$58	6%
R1-GS - Industrial - Top 10 Percentile	\$0	0%	\$411	3%	\$461	14%	\$1,568	153%	\$2,440	4%
R2 - Seasonal - Nov to Mar	\$0	0%	\$33	4%	\$16	14%	\$63	181%	\$112	5%
R2 - Seasonal - Apr to Oct	\$0	0%	\$42	4%	\$42	14%	\$170	182%	\$254	5%
R2 - Seasonal - Annual	\$0	0%	\$75	4%	\$58	14%	\$233	182%	\$366	5%
R3 - Large Volume Contract	\$0	0%	\$1,858	3%	\$2,711	14%	(\$61)	-1%	\$4,508	1%
R4 - Peaking - Apr to Dec	\$0	0%	\$310	5%	\$172	14%	\$499	130%	\$982	4%
R4 - Peaking - Jan to Mar	\$0	0%	\$16	5%	\$3	14%	\$10	128%	\$29	5%
R4 - Peaking - Annual	\$0	0%	\$326	5%	\$176	14%	\$509	130%	\$1,010	4%
R5 - Interruptible Peaking	\$0	0%	(\$1,088)	-9%	\$560	14%	\$3,014	242%	\$2,486	4%
R6 - IGPC	N/A	N/A	\$28,438	3%	\$0	0%	(\$0)	-100%	\$28,438	3%