



Town of Newmarket Council Information Package

Index of Attachments

Date: October 25, 2024

Pages

General Correspondence Items

- | | | |
|----|---|----|
| 1. | Concerns with the Transport and Deposition of Naturally Occurring Radioactive Material (NORM) at the Agnew Lake Tailings Management Area (ALTMA) | 1 |
| | Township of Nairn and Hyman | |
| | October 11, 2024 | |
| 2. | Provincial Updates to the Municipal Elections Act | 4 |
| | Town of Smiths Falls | |
| | October 15, 2024 | |
| 3. | Town of Bracebridge Resolution - AMCTO Recommendations for Updates to the Municipal Elections Act | 7 |
| | Town of Bracebridge | |
| | October 15, 2024 | |
| 4. | Township of McGarry Resolution to Support AMCTO Provincial Updates to the Municipal Elections Act | 9 |
| | Township of McGarry | |
| | October 15, 2024 | |
| 5. | AMCTO Recommendations to Review and Update the MEA - Municipality of West Nipissing | 11 |
| | Municipality of West Nipissing | |
| | October 17, 2024 | |

6.	York Region - September 30, 2024 (Q3) - Total Population and Household Estimate	59
	York Region	
	October 17, 2024	
7.	Council Resolution - Ten Dollar a Day Daycare	61
	Town of Stouffville	
	October 21, 2024	
8.	MSC 2024-363 - Asset Retirement Obligation	64
	Municipality of St.-Charles	
	October 21, 2024	
9.	MSC Res 2024-364 - Family Doctors	66
	Municipality of St.-Charles	
	October 21, 2024	
10.	MSC Res 2024-365 - Green Roads Pilot Project	67
	Municipality of St.-Charles	
	October 21, 2024	
11.	MSC Res 2024-366 - Sustainable Funding for OPP in Small Rural Municipalities	70
	Municipality of St.-Charles	
	October 21, 2024	
12.	MSC Res 2024-367 - Immediate Action Needed to Support Ontario's Forest Sector	73
	Municipality of St.-Charles	
	October 21, 2024	
13.	MSC Res 2024-368 - Urging the Government to Promptly Resume Assessment Cycle	77
	Municipality of St.-Charles	
	October 21, 2024	

14.	MSC Res 2024-369 - The Canada Community-Building Fund	81
	Municipality of St.-Charles	
	October 21, 2024	
15.	MSC Res 2024-370 - Radioactive Material being Transported to the Township of Nairn and Hyman	84
	Municipality of St.-Charles	
	October 21, 2024	
16.	Resolution Support 'Public Sector Salary Disclosure'	88
	Northumberland County	
	October 21, 2024	
17.	Temporary Lane Closure: Davis Drive, Town of Newmarket, October 24-27	92
	York Region	
	October 21, 2024	
18.	Town of Stouffville Resolution - AMO Policy Update	95
	Town of Stouffville	
	October 21, 2024	
19.	Letter of Support - Increase Tile Drain Loan Limit	98
	Township of Clearview	
	October 22, 2024	
20.	York Region Transit: November Service Changes and PRESTO E-Tickets App	100
	York Region	
	October 22, 2024	
21.	Establishment of an Ontario Rural Road Safety Program - Council of the Town of The Blue Mountains Resolution	102
	Town of the Blue Mountains	
	October 23, 2024	

- | | | |
|------------|---|------------|
| 22. | Township of Larder Lake Council Resolution - Government Regulations of Nicotine Pouches | 105 |
| | October 24, 2024 | |
| | Township of Larder Lake | |
| 23. | Township of Larder Lake Council Resolution - Support resolution no. 24-366 passed by the City of Quinte West | 106 |
| | Township of Larder Lake | |
| | October 24, 2024 | |
| 24. | EB-2024-0251 Enbridge Gas Inc - 2025 Federal Carbon Pricing Program (FCPP) Application - OEB Notice | 107 |
| | Enbridge Gas Inc. | |
| | October 25, 2024 | |

Proclamation, Lighting Requests and Community Flag Raising

- | | | |
|-----------|--|------------|
| 1. | World Premature Day Illumination Campaign | 215 |
| | Proclamation - November 17, 2024 | |
| | Lighting - November 17, 2024 (purple) | |

Information Reports

- INFO-2024-23: Development Application Process Review - Achievements



October 11, 2024

Sent via email: premier@ontario.ca

The Honourable Doug Ford
 Premier of Ontario
 Premier's Office, Room 281
 Legislative Building, Queen's Park
 Toronto, ON M7A 1A1

RE: Opposition to the Transportation and Deposition of Naturally Occurring Radioactive Material (NORM) and Mine Tailings from the Former Beaucage Mine and Waste Site

On behalf of the Councils of the Corporation of the Township of Nairn and Hyman and the Corporation of the Township of Baldwin, we are formally submitting the attached joint resolution regarding our serious concerns over the proposed transportation and deposition of radioactive naturally occurring materials (NORM) to the Agnew Lake Tailings Management Area (ALTMA).

Our Councils recently convened a Joint Emergency Meeting on October 2, 2024, to discuss this matter in response to information presented at a Town Hall Meeting on September 11, 2024, by the Ministry of Mines, the Ministry of Transportation, and the Canadian Nuclear Safety Commission. During our deliberations, it became evident that the materials slated for transport are not correctly categorized as NORM, but rather as mine tailings containing not only radioactive substances like niobium and uranium but also other hazardous heavy metals.

We are gravely concerned about the potential environmental and health impacts this project may have, particularly on Agnew Lake—a critical drinking water source for our communities. Our position is that ALTMA should be remediated using clean materials to mitigate existing contamination rather than accepting additional hazardous materials that could exacerbate environmental harm.

This joint resolution calls upon your government and relevant ministries to halt any further actions related to the transportation of this hazardous product to the ALTMA site. The resolution reads as follows:

RESOLUTION # 2024-EM2-12

DATED: October 2, 2024

MOVED BY: Vern Gorham

SECONDED BY: Jason Cote

WHEREAS the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin convened a Joint Emergency Meeting on Wednesday, October 2, 2024 to discuss the proposed plan to transport and deposit radioactive naturally occurring materials (NORM) at the Agnew Lake Tailings Management Area (ALTMA); and

WHEREAS the Councils reviewed information received from the Ministry of Mines, the Ministry of Transportation and the Canadian Nuclear Safety Commission regarding this proposed plan at the Town Hall Meeting dated September 11, 2024; and

WHEREAS the Councils strongly agree that the materials that are planned to be deposited are not correctly defined as naturally occurring radioactive materials but rather mine tailings that contain not only the radioactive substance Niobium and uranium but also contain heavy metals that pose significant environmental and health risks; and

WHEREAS there are significant concerns regarding the potential contamination of drinking water sources, particularly Agnew Lake, which many residents rely on for safe drinking water; and

WHEREAS the Councils agree that the Agnew Lake Tailings Management Area (ALTMA) needs to be remediated using clean materials to mitigate the existing environmental impacts, rather than being used for the deposition of additional hazardous materials; and

THEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin formally oppose the transportation and deposition of these materials from the former Beaucage Mine and Waste Site, Nipissing First Nations lands and adjacent lands operated by the Ministry of Transportation to the Agnew Lake Tailings Management Area; and

BE IT FURTHER RESOLVED THAT the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin respectfully demand that the Province of Ontario, the Ministry of Mines, the Ministry of Transportation, the Canadian Nuclear Safety Commission provide answers to our questions and that the municipalities receive notification of all forward movements of this project; and

THAT a copy of this resolution be forwarded to the Honourable Doug Ford, Premier of Ontario; the Honourable George Pirie, the Minister of Mines; the Honourable Prabmeet Sarkaria, the Minister of Transportation; the Honourable Andrea Khanjin, the Minister of the Environment, Conservation and Parks; Chief Toulouse and Sagamok Anishnawbek Council Members; Chief Nootchtai and Atikameksheng Anishnawbek Council Members; Chief Rodney Nahwegahbow and the Whitefish River First Nation Council Members; Chief Patsy Corbiere and the Aundeck Omni Kaning First Nation Council Members; the United Chiefs and Council of Mnidoo Mnising; Ontario Ombudsman; the Canadian Nuclear Safety Commission; the Canadian Environmental Law Association; MP Carol Hughes; MPP Michael Mantha; the Association of Ontario Municipalities and all Ontario Municipalities.

CARRIED

We respectfully request your immediate attention to this matter and urge the Province of Ontario to prioritize the protection of our community's health, safety, and environmental integrity.

For more information regarding this matter, please contact our municipal office by email at belindaketchabaw@nairncentre.ca or by phone at (705) 869-4232.

Yours truly,



Belinda Ketchabaw
CAO Clerk Treasurer
Township of Nairn and Hyman

Cc:

Honourable George Pirie, the Minister of Mines
Honourable Prabmeet Sarkaria, the Minister of Transportation
Honourable Andrea Khanjin, the Minister of the Environment, Conservation and Parks
Chief Toulouse and the Sagamok Anishnawbek Council Members
Chief Nootchtai and the Atikameksheng Anishnawbek Council Members

Chief Rodney Nahwegahbow and the Whitefish River First Nation Council Members
Chief Patsy Corbiere and the Aundeck Omni Kaning First Nation Council Members
The United Chiefs and Council of Mniidoo Mnising
Ontario Ombudsman
Canadian Nuclear Safety Commission
Canadian Environmental Law Association
MP Carol Hughes
MPP Michael Mantha
Association of Ontario Municipalities
All Ontario Municipalities



SMITHS FALLS

RISE AT THE FALLS

October 15, 2024

sent via email

Minister Paul Calandra
Municipal Affairs and Housing
777 Bay Street
College Park 17th Floor,
Toronto, ON M7A 2J3
minister.mah@ontario.ca

Dear Minister Calandra:

I am writing to you as the Town Clerk at the Town of Smiths Falls and as the municipal officer responsible for the administration of the *Municipal Elections Act, 1996* in support of [AMCTO's recommendations](#) calling for the comprehensive changes to *MEA*.

AMCTO members, as municipal leaders, support the interests and well-being of 235,000 municipal employees across all municipalities in this Province.

Local election administrators care about running fair and accessible elections. We care about ensuring that candidates, voters, and third-party advertisers understand their responsibilities. We care that those that may knowingly break the rules are held to account. We care that the *MEA* and the accompanying *Education Act* and *Assessment Act* are complicated pieces of legislation on their own, and more so read together.

That is why AMCTO reviews the *Act* after every local election and why the Province should be making the necessary changes to make election administration easier and the *Act* clearer to follow for candidates and voters within the timelines AMCTO has set out.

Never has there been a more important moment to ensure the *Act* is working well, closes gaps and provides the right enforcement tools and mechanisms to safeguard our local electoral processes from threats of foreign interference, misinformation and bad actors. Local clerks need support and guidance on how to manage these threats and deal with potential events especially considering the federal government's recent legislation on foreign interference (Bill C-70).

AMCTO convened a group of municipal staff with experience and expertise in administering local elections to present you with several recommendations for making improvements to *MEA* and calling for an overhaul of the *Act* in the long-term.



SMITHS FALLS

RISE AT THE FALLS

I support AMCTO's recommendations and call on you to update the *MEA* with priority and secondary recommendations by mid 2025 ahead of the 2026 election so that I can make the necessary adjustments for planning and implementation well ahead of statutory timelines imposed upon me to administer an election.

There is a provincial interest in ensuring the health of local democracy and the time to act is now – proactively instead of reactively. Election administrators face several uncertainties as we look ahead to 2026. We observe that in other jurisdictions with elections there is an increasing use of artificial intelligence (AI) and other technology to spread misinformation. There are increased levels of electoral interference. Even in Canada, we are seeing reports of more candidates and elected officials stepping back from public life because of concerns for their safety and reputations.

There also is a provincial interest for reducing administrative and operational burdens to help free up staff time to focus on other critical statutory and operational tasks such as those related to planning and development processes, municipal governance, as well as service innovation, in support of provincial priorities.

I look forward to seeing legislation introduced to update the *MEA* in the coming months to address current challenges, streamline processes, and make legislation easier to understand and administer.

Please do not hesitate to contact me with any questions and/or concerns.

Yours truly,

Kerry Costello
Town Clerk

cc: Paul Shipway, President, AMCTO president@amcto.com
 Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing
martha.greenberg@ontario.ca
 All Municipalities in Ontario
 Honourable Jill Dunlop, Minister of Education minister.edu@ontario.ca
 Honourable Todd McCarthy, Minister of Public and Business Service Delivery and
 Procurement todd.mccarthy@ontario.ca
 Honourable Peter Bethlenfalvy, Minister of Finance Minister.fin@ontario.ca
 Honourable Doug Ford, Premier of Ontario Premier@ontario.ca
 Honourable John Jordan, M.P.P. Lanark-Frontenac-Kingston John.jordan@pc.ola.org

Attachment: Resolution



SMITHS FALLS

RISE AT THE FALLS

**Resolution passed October 7, 2024:
Provincial Updates to the Municipal Elections Act**

WHEREAS elections rules need to be clear, supporting candidates and voters in their electoral participation and election administrators in running elections.

WHEREAS legislation needs to strike the right balance between providing clear rules and frameworks to ensure the integrity of the electoral process,

WHEREAS the legislation must also reduce administrative and operational burden for municipal staff ensuring that local election administrators can run elections in a way that responds to the unique circumstances of their local communities.

WHEREAS the Municipal Elections Act, 1996 (MEA) will be 30 years old by the next municipal and school board elections in 2026.

WHEREAS the MEA sets out the rules for local elections, the Assessment Act, 1990 and the Education Act, 1990 also contain provisions impacting local elections adding more places for voters, candidates, and administrators to look for the rules that bind the local democratic process in Ontario.

WHEREAS with rules across three pieces of legislation, and the MEA containing a patchwork of clauses, there are interpretation challenges, inconsistencies, and gaps to fill.

WHEREAS the Act can pose difficulties for voters, candidates, contributors and third-party advertisers to read, to interpret, to comply with and for election administrators to enforce.

WHEREAS while local elections are run as efficiently and effectively as can be within the current legislative framework, modernization and continuous improvement is needed to ensure the Act is responsive to today's needs and tomorrow's challenges.

WHEREAS to keep public trust and improve safeguards the Act should be reviewed considering the ever-changing landscape which impacts elections administration including privacy, the threats of foreign interference, increased spread of mis/disinformation and the increased use of technologies like artificial intelligence and use of digital identities.

WHEREAS the Association of Municipal Managers, Clerks, and Treasurers of Ontario (AMCTO) reviewed the Act and has provided several recommendations including modernizing the legislation, harmonizing rules, and streamlining and simplifying administration.

AND WHEREAS AMCTO put forward recommendations for amendments ahead of the 2026 elections and longer-term recommendations for amendments ahead of the 2030 elections.

THEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Town of Smiths Falls calls for the Province to update the MEA with priority amendments as outlined by AMCTO before Summer 2025 and commence work to review and re-write the MEA with longer-term recommendations ahead of the 2030 elections.

AND BE IT FURTHER RESOLVED that this resolution will be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing, the Minister of Education, the Minister of Public and Business Service Delivery, Minister of Finance the Premier of Ontario, our local MPP and AMCTO.



October 15, 2024

Re: Item for Discussion – AMCTO Recommendations for Updates to the Municipal Elections Act

At its meeting of October 9, 2024, the Council of the Corporation of the Town of Bracebridge ratified motion #24-GC-184, regarding the AMCTO Recommendations for Updates to the Municipal Elections Act, as follows:

“WHEREAS elections rules need to be clear, supporting candidates and voters in their electoral participation and election administrators in running elections;

AND WHEREAS legislation needs to strike the right balance between providing clear rules and frameworks to ensure the integrity of the electoral process;

AND WHEREAS the legislation must also reduce administrative and operational burden for municipal staff ensuring that local election administrators can run elections in a way that responds to the unique circumstances of their local communities;

AND WHEREAS the Municipal Elections Act, 1996 (MEA) will be 30 years old by the next municipal and school board elections in 2026;

AND WHEREAS the MEA sets out the rules for local elections, the Assessment Act, 1990 and the Education Act, 1990 also contain provisions impacting local elections adding more places for voters, candidates, and administrators to look for the rules that bind the local democratic process in Ontario;

AND WHEREAS with rules across three pieces of legislation, and the MEA containing a patchwork of clauses, there are interpretation challenges, inconsistencies, and gaps to fill;

AND WHEREAS the Act can pose difficulties for voters, candidates, contributors and third-party advertisers to read, to interpret, to comply with and for election administrators to enforce;

AND WHEREAS while local elections are run as efficiently and effectively as can be within the current legislative framework, modernization and continuous improvement is needed to ensure the Act is responsive to today’s needs and tomorrow’s challenges;

AND WHEREAS to keep public trust and improve safeguards the Act should be reviewed considering the ever-changing landscape which impacts elections administration including privacy, the threats of foreign interference, increased spread of mis/disinformation and the increased use of technologies like artificial intelligence and use of digital identities;

1000 Taylor Court
Bracebridge, ON
P1L 1R6 Canada

telephone: (705) 645-5264
corporate services and finance fax: (705) 645-1262
public works fax: (705) 645-7525
planning & development fax: (705) 645-4209

AND WHEREAS the Association of Municipal Managers, Clerks, and Treasurers of Ontario (AMCTO) reviewed the Act and has provided several recommendations including modernizing the legislation, harmonizing rules, and streamlining and simplifying administration;

AND WHEREAS AMCTO put forward recommendations for amendments ahead of the 2026 elections and longer-term recommendations for amendments ahead of the 2030 elections;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Town of Bracebridge calls for the Province to update the MEA with priority amendments as outlined by AMCTO before Summer 2025 and commence work to review and re-write the MEA with longer-term recommendations ahead of the 2030 elections.

AND FURTHER THAT that this resolution will be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing; the Minister of Education; the Minister of Public and Business Service Delivery; Minister of Finance; the Premier of Ontario; the Local Member of Provincial Parliament; AMCTO; the Association of Municipalities of Ontario (AMO); and all Ontario Municipalities.”

In accordance with Council's direction, I am forwarding you a copy of the resolution for your reference.

Please do not hesitate to contact me if I can provide any additional clarification in this regard.

Yours truly,

A handwritten signature in black ink, appearing to read "Lori McDonald". The signature is written in a cursive, flowing style.

Lori McDonald
Director of Corporate Services/Clerk



October 8, 2024

Resolution No. 310/2024

**THE CORPORATION OF THE TOWNSHIP OF MCGARRY
P.O. BOX 99,
VIRGINIATOWN, ON. P0K 1X0**

MOVED BY

Alcine Lee

SECONDED BY

Francine Plante

WHEREAS elections rules need to be clear, supporting candidates and voters in their electoral participation and election administrators in running elections.

WHEREAS legislation needs to strike the right balance between providing clear rules and frameworks to ensure the integrity of the electoral process,

WHEREAS the legislation must also reduce administrative and operational burden for municipal staff ensuring that local election administrators can run elections in a way that responds to the unique circumstances of their local communities.

WHEREAS the Municipal Elections Act, 1996 (MEA) will be 30 years old by the next municipal and school board elections in 2026.

WHEREAS the MEA sets out the rules for local elections, the Assessment Act, 1990 and the Education Act, 1990 also contain provisions impacting local elections adding more places for voters, candidates, and administrators to look for the rules that bind the local democratic process in Ontario.

WHEREAS with rules across three pieces of legislation, and the MEA containing a patchwork of clauses, there are interpretation challenges, inconsistencies, and gaps to fill.

WHEREAS the Act can pose difficulties for voters, candidates, contributors and third-party advertisers to read, to interpret, to comply with and for election administrators to enforce.

WHEREAS while local elections are run as efficiently and effectively as can be within the current legislative framework, modernization and continuous improvement is needed to ensure the Act is responsive to today's needs and tomorrow's challenges.

WHEREAS to keep public trust and improve safeguards the Act should be reviewed considering the ever-changing landscape which impacts elections administration including privacy, the threats of foreign interference, increased spread of mis/disinformation and the increased use of technologies like artificial intelligence and use of digital identities.

WHEREAS the Association of Municipal Managers, Clerks, and Treasurers of Ontario (AMCTO) reviewed the Act and has provided several recommendations including modernizing the legislation, harmonizing rules and streamlining and simplifying administration.

AND WHERAS AMCTO put forward recommendations for amendments ahead of the 2026 elections and longer-term recommendations for amendments ahead of the 2030 elections.

BE IT RESOLVED THAT The Township of McGarry calls for the Province to update the MEA with priority amendments as outlined by AMCTO before Summer 2025 and commence work to review and re-write the MEA with longer- term recommendations ahead of the 2030 elections.

AND BE IT FURTHER RESOLVED that this resolution will be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing (minister.mah@ontario.ca), the Minister of Education (minister.edu@ontario.ca) the Minister of Public and Business Service Delivery (todd.mccarthy@ontario.ca), Minister of Finance (Minister.fin@ontario.ca) the Premier of Ontario (premier@ontario.ca) , Sylvia Jones MPP (sylvia.jones@ontario.ca) and AMCTO (advocacy@amcto.com)

Defeated _____ / Carried Bonita Culhane
Mayor Mayor

Recorded Vote Requested by _____

	YES	NO
Mayor Bonita Culhane	_____	_____
Councillor Louanne Caza	_____	_____
Councillor Elaine Fic	_____	_____
Councillor Annie Keft	_____	_____
Councillor Francine Plante	_____	_____



October 17, 2024

Honourable Premier Doug Ford
Legislative Building
Queen's Park, Room 281
Toronto, ON M7A 1A1

SENT VIA E-MAIL
premier@ontario.ca

Dear Premier Ford :

RE: AMCTO RECOMMENDATIONS TO UPDATE THE MUNICIPAL ELECTIONS ACT (MEA)

At its regular meeting held on October 15 2024, Council for the Municipality of West Nipissing passed the following resolution.

<< Resolution: **2024/285**

Moved By: Councillor R. Larabie

Seconded By: Councillor G. Pharand

WHEREAS at the meeting of October 15, 2024, Council for the Municipality of West Nipissing received and supports resolution no. 2024-152 from the Town of Parry Sound;

BE IT RESOLVED THAT Council for the Municipality of West Nipissing calls on the Province of Ontario to update the *Municipal Elections Act* (MEA) with the priority amendments as outlined by AMCTO and commence work to review and re-write the MEA with long-term recommendations ahead of the upcoming elections;

BE IT FURTHER RESOLVED THAT a copy of this resolution be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing (minister.mah@ontario.ca), the Minister of Education (minister.edu@ontario.ca), the Minister of Public and Business Service Delivery (todd.mccarthy@ontario.ca), the Minister of Finance (minister.fin@ontario.ca), the Premier of Ontario (premier@ontario.ca), John Vanthof (MPP) and AMCTO (advocacy@amcto.com)

CARRIED >>

In accordance with Council's direction, the resolution is being forwarded for your reference.

Respectfully,

Janice Dupuis
Deputy Clerk
Municipality of West Nipissing



West Nipissing Ovest

CORPORATION OF THE MUNICIPALITY OF WEST NIPISSING

Council - Committee of the Whole

Resolution # 2024/285
Title: Authorize support of Parry Sound resolution re: AMCTO recommendations to update Municipal Elections Act
Date: October 15, 2024

Moved by: Councillor Roland Larabie
Seconded by: Councillor Georges Pharand

WHEREAS at the meeting of October 15, 2024, Council for the Municipality of West Nipissing received and supports resolution no. 2024-152 from the Town of Parry Sound;

BE IT RESOLVED THAT Council for the Municipality of West Nipissing calls on the Province of Ontario to update the *Municipal Elections Act* (MEA) with the priority amendments as outlined by AMCTO and commence work to review and re-write the MEA with long-term recommendations ahead of the upcoming elections;

BE IT FURTHER RESOLVED THAT a copy of this resolution be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing (minister.mah@ontario.ca), the Minister of Education (minister.edu@ontario.ca), the Minister of Public and Business Service Delivery (todd.mccarthy@ontario.ca), the Minister of Finance (minister.fin@ontario.ca), the Premier of Ontario (premier@ontari.ca), John Vanthof (MPP) and AMCTO (advocacy@amcto.com)

CARRIED



West Nipissing Ovest

CORPORATION DE LA MUNICIPALITÉ DE NIPISSING OUEST

Council - Committee of the Whole

Résolution # 2024/285

Titre: Autoriser le soutien de la résolution de Parry Sound concernant les recommandations de l'AMCTO pour la mise à jour de la loi sur les élections municipales

Date: le 15 octobre 2024

Proposé par: Councillor Roland Larabie

Appuyé par: Councillor Georges Pharand

ATTENDU QUE lors de la réunion du 15 octobre 2024, le conseil de la municipalité de Nipissing Ovest a reçu et appuie la résolution no 2024-152 de la ville de Parry Sound ;

IL EST RÉSOLU QUE le conseil de la municipalité de Nipissing Ovest demande à la province de l'Ontario de mettre à jour la Loi sur les élections municipales (LEM) avec les amendements prioritaires tels que décrits par l'AMCTO et de commencer le travail de révision et de réécriture de la LEM avec des recommandations à long terme avant les prochaines élections ;

IL EST EN OUTRE RÉSOLU QU'une copie de cette résolution soit transmise à toutes les municipalités de l'Ontario pour obtenir leur soutien et que chaque appui soit ensuite transmis au ministre des Affaires municipales et du Logement (minister.mah@ontario.ca), au ministre de l'Éducation (minister.edu@ontario.ca), au ministre de la Prestation des services publics et commerciaux (todd.mccarthy@ontario.ca), au ministre des Finances (minister.fin@ontario.ca), au premier ministre de l'Ontario (premier@ontari.ca), à John Vanthof (député provincial) et à l'AMCTO (advocacy@amcto.com).

ADOPTÉ



52 Seguin Street, Parry Sound, Ontario P2A 1B4
Tel: (705) 746-2101 • Fax: (705) 746-7461 • www.parrysound.ca

October 2, 2024

Minister Paul Calandra
Municipal Affairs and Housing
777 Bay Street
College Park 17th Floor,
Toronto, ON M7A 2J3
Via e-mail: minister.mah@ontario.ca

Dear Minister Calandra,

I am writing to you as the Municipal Clerk at the Town of Parry Sound and as the municipal officer responsible for the administration of the *Municipal Elections Act, 1996* in support of [AMCTO's recommendations](#) calling for the comprehensive changes to *MEA*.

AMCTO members, as municipal leaders, support the interests and well-being of 235,000 municipal employees across all municipalities in this Province.

Local election administrators care about running fair and accessible elections. We care about ensuring that candidates, voters, and third-party advertisers understand their responsibilities. We care that those that may knowingly break the rules are held to account. We care that the *MEA* and the accompanying *Education Act* and *Assessment Act* are complicated pieces of legislation on their own, and more so read together.

That is why AMCTO reviews the *Act* after every local election and why the Province should be making the necessary changes to make election administration easier and the *Act* clearer to follow for candidates and voters within the timelines AMCTO has set out.

Never has there been a more important moment to ensure the *Act* is working well, closes gaps and provides the right enforcement tools and mechanisms to safeguard our local electoral processes from threats of foreign interference, misinformation and bad actors. Local clerks need support and guidance on how to manage these threats and deal with potential events especially considering the federal government's recent legislation on foreign interference (Bill C-70).

AMCTO convened a group of municipal staff with experience and expertise in administering local elections to present you with several recommendations for making improvements to *MEA* and calling for an overhaul of the *Act* in the long-term.

I support AMCTO's recommendations and call on you to update the *MEA* with priority and secondary recommendations by mid 2025 ahead of the 2026 election so that I can make the necessary adjustments for planning and implementation well ahead of statutory timelines imposed upon me to administer an election.

There is a provincial interest in ensuring the health of local democracy and the time to act is now – proactively instead of reactively. Election administrators face several uncertainties as we look ahead to 2026. We observe that in other jurisdictions with elections there is an increasing use of artificial intelligence (AI) and other technology to spread misinformation. There are increased levels of electoral interference. Even in Canada, we are seeing reports of more candidates and elected officials stepping back from public life because of concerns for their safety and reputations.

There also is a provincial interest for reducing administrative and operational burdens to help free up staff time to focus on other critical statutory and operational tasks such as those related to planning and development processes, municipal governance, as well as service innovation, in support of provincial priorities.

I look forward to seeing legislation introduced to update the *MEA* in the coming months to address current challenges, streamline processes, and make legislation easier to understand and administer.

Sincerely,



Rebecca Johnson
Clerk

/rj
Encl.

cc: Paul Shipway, President, AMCTO president@amcto.com
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and
Housing martha.greenberg@ontario.ca
Jill Dunlop, Minister of Education minister.edu@ontario.ca
Todd McCarthy, Minister of Public & Business Service Delivery &
Procurement todd.mccarthy@ontario.ca
Peter Bethlenfalvy, Minister of Finance Minister.fin@ontario.ca
Doug Ford, Premier of Ontario premier@ontario.ca
Graydon Smith, MPP Parry Sound-Muskoka Graydon.Smith@pc.ola.org
Ontario Municipal Clerks



THE CORPORATION OF THE TOWN OF PARRY SOUND
RESOLUTION IN COUNCIL

NO. 2024 – 152

DIVISION LIST

YES NO

DATE: October 1, 2024

- Councillor **G. ASHFORD**
- Councillor **J. BELESKEY**
- Councillor **P. BORNEMAN**
- Councillor **B. KEITH**
- Councillor **D. McCANN**
- Councillor **C. McDONALD**
- Mayor **J. McGARVEY**

MOVED BY:

Paul Borne

SECONDED BY:

[Signature]

CARRIED: DEFEATED: _____ Postponed to: _____

WHEREAS election rules need to be clear, supporting candidates and voters in their electoral participation and election administrators in running elections.

WHEREAS legislation needs to strike the right balance between providing clear rules and frameworks to ensure the integrity of the electoral process,

WHEREAS the legislation must also reduce administrative and operational burden for municipal staff ensuring that local election administrators can run elections in a way that responds to the unique circumstances of their local communities.

WHEREAS the Municipal Elections Act, 1996 (MEA) will be 30 years old by the next municipal and school board elections in 2026.

WHEREAS the MEA sets out the rules for local elections, the Assessment Act, 1990 and the Education Act, 1990 also contain provisions impacting local elections adding more places for voters, candidates, and administrators to look for the rules that bind the local democratic process in Ontario.

WHEREAS with rules across three pieces of legislation, and the MEA containing a patchwork of clauses, there are interpretation challenges, inconsistencies, and gaps to fill.

WHEREAS the Act can pose difficulties for voters, candidates, contributors and thirdparty advertisers to read, to interpret, to comply with and for election administrators to enforce.

WHEREAS while local elections are run as efficiently and effectively as can be within the current legislative framework, modernization and continuous improvement is needed to ensure the Act is responsive to today’s needs and tomorrow’s challenges.

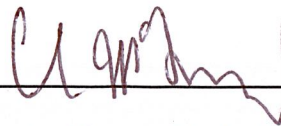
WHEREAS to keep public trust and improve safeguards the Act should be reviewed considering the ever-changing landscape which impacts elections administration including privacy, the threats of foreign interference, increased spread of mis/disinformation and the increased use of technologies like artificial intelligence and use of digital identities.

WHEREAS the Association of Municipal Managers, Clerks, and Treasurers of Ontario (AMCTO) reviewed the Act and has provided several recommendations including modernizing the legislation, harmonizing rules, and streamlining and simplifying administration.

AND WHEREAS AMCTO put forward recommendations for amendments ahead of the 2026 elections and longer-term recommendations for amendments ahead of the 2030 elections.

THEREFORE BE IT RESOLVED THAT the Town of Parry Sound calls for the Province to update the MEA with priority amendments as outlined by AMCTO before Summer 2025 and commence work to review and re-write the MEA with longer-term recommendations ahead of the 2030 elections.

AND BE IT FURTHER RESOLVED that this resolution will be forwarded to all municipalities in Ontario for support and that each endorsement be then forwarded to the Minister of Municipal Affairs and Housing (minister.mah@ontario.ca), the Minister of Education (minister.edu@ontario.ca), the Minister of Public and Business Service Delivery (todd.mccarthy@ontario.ca), Minister of Finance (Minister.fin@ontario.ca) the Premier of Ontario (premier@ontario.ca), Parry Sound Muskoka MPP Graydon Smith and AMCTO (advocacy@amcto.com).



Deputy Mayor Chris McDonald



AMCTO
THE MUNICIPAL EXPERTS

**Modernizing the
Municipal Elections Act
for the 21st Century**



Introduction

The *Municipal Elections Act (MEA)* legislates the processes for how local elections operate in Ontario. It provides municipal staff who are also local election administrators with the framework in which to organize and run efficient municipal elections. It provides voters, candidates and third-party advertisers with guidance on qualifications for participating in local democracy. The *Act* serves as an important tool for local election accountability, ensuring smooth democratic processes for citizens across Ontario, and is key to voter and public trust in local governments.

While public trust has always been [front and centre to democratic processes](#)¹, since the COVID-19 pandemic there has been [commentary, concern and cautions raised](#) about the state of trust in public institutions at all levels of government and the state of the democratic process that empowers those institutions². Applying a continuous improvement mindset to the rules and framework that support local democracy ensures democratic processes are modernized, reflect current circumstances and technology, meet citizen expectations, and continue to be reliable.

As the largest voluntary municipal association in Ontario with members working across the province, the Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO) takes the position that local governments serve as the most transparent level of government with openness and accountability at the core of operations. To continuously improve public trust, a comprehensive review of the *MEA* is needed in consultation with the sector. By reviewing and re-writing the *MEA* to reflect today's challenges in bolstering public trust, improving voter turnout, and improving overall election administration; voters, residents, candidates, third parties, interest groups and election administrators can rely on a modern act that is clear and consistent, while ensuring that processes are accountable and transparent.

To keep public trust and improve safeguards, a review should apply a lens considering the ever-changing landscape that impacts election administration. This includes [threats of foreign interference](#)³,

¹ AMCTO. 2015, *Submission on the Municipal Elections Act*. <https://www.amcto.com/sites/default/files/2023-05/AMCTO-MEA-Submission.pdf>

² Bridgman, A., et al. Mis- and Disinformation During the 2021 Canadian Federal Election. Media Ecosystem Observatory, March 2022. https://www.mcgill.ca/maxbellschool/files/maxbellschool/meo_election_2021_report.pdf

³ For instance, Ball, Stewart. "China tried to influence last two federal elections, says report released by CSIS." *Global News*, 31, Jan. 2024. <https://globalnews.ca/news/10264872/canada-china-foreign-interference-elections-csis-report/>



increased spread of misinformation⁴ and the increased use of technologies like artificial intelligence (AI) that presents both [opportunities](#)⁵ and [challenges](#)⁶ for election administration and for supporting candidates and voters in their electoral participation. A fulsome review should also contemplate how to ensure the continued health of our local democracies, something the Association of Municipalities of Ontario (AMO) is looking at currently through their [Healthy Democracy Project](#)⁷.

While we know this is easier said than done and recognize that the legislation contains a patchwork of provisions which attempts to fill in gaps, this approach has made the overall MEA in its current form, more challenging to read, interpret, comply with, and enforce. With the upcoming 2026 municipal elections, municipalities will be planning earnestly early next year, and a focus on renewing the election frameworks has never been timelier.

This submission has been prepared by AMCTO with a goal to improve and modernize the MEA and its regulations. It highlights the need for revisions as conducted on a line-by-line basis and considers how the proposed amendments would impact other acts such as the *Education Act, 1990* and the *Assessment Act, 1990*. Our recommendations focus on outcomes-based solutions across three broad themes:

1. **Strengthening Public Trust and Electoral Integrity**
2. **Enhancing Accountability and Transparency while Making Compliance and Enforcement Easier**
3. **Permissive Legislation that Reduces Administrative Complexity**

Through this submission, we also identify a proposed timeline to assist the Province in planning for continuous improvements to the Act. These recommendations are labelled as:

- **Priority:** those we believe must be implemented through legislative updates ahead of 2026
- **Secondary:** those we believe can and should be implemented through legislative updates ahead of 2026
- **Long-term:** those that may require further investigation, analysis, and collaboration between the Province, AMCTO, municipalities, and other affected stakeholders to get right.*

**It should be noted that these are no less important to AMCTO members and we would encourage the Province to initiate work on them as soon as possible.*

This submission is the result of continuous work by our MEA Working Group, ongoing conversations with members, as well as feedback from clerks following the 2022 municipal elections. Through this submission, we hope to inspire the Province to take action in reviewing the MEA and to inform a broader dialogue around local election administration, the importance of openness and accountability in local government.

⁴ For instance, Thompson, Elizabeth. "Disinformation, foreign interference threatening Canada's electoral system, elections watchdog warns." *CBC News*. 22, June 2022. <https://www.cbc.ca/news/politics/canada-elections-watchdog-cote-1.6497875>; Bridgman, A., et al. Mis- and Disinformation During the 2021 Canadian Federal Election. Media Ecosystem Observatory. Mar. 2022. https://www.mcgill.ca/maxbellschool/files/maxbellschool/meo_election_2021_report.pdf

⁵ Deepack P et al. *AI Magazine*. "AI and core electoral processes: Mapping the horizons." V. 44.3 Fall 2023. <https://onlinelibrary.wiley.com/doi/full/10.1002/aaai.12105>

⁶ Leaders. "How worried should you be about AI disrupting elections?" *The Economist*. 31 Aug. 2023. <https://www.economist.com/leaders/2023/08/31/how-artificial-intelligence-will-affect-the-elections-of-2024>

⁷ See <https://www.amo.on.ca/about-us/healthy-democracy-project>





Background

Elections occur in 414 cities, towns, and villages[†] across Ontario to ensure that 2,842⁸ municipal offices and 676⁹ school board trustees are elected through processes that run as efficiently and effectively as possible within the current legislative framework.

While the *MEA* sets out the rules for local elections, the *Assessment Act, 1990* and the *Education Act, 1990* also contain provisions impacting local elections; adding more places for voters, candidates, and administrators to look for the rules that bind the local democratic process in Ontario.

quality assurance testing
compliance audit post-election reporting
staff training committee recruitment
ward boundary candidate support
election monitoring financial statement reviews
representation reviews overseeing prosecutions
new council orientation stakeholder relationships
vendor procurement supply chain management
voters list updates local scouting
volunteer recruitment

Election administration is a complex endeavour that municipal staff lead and oversee. This includes a multi-year planning and implementation journey that continues up to a year or more past election day. As election administrators, municipal clerks support candidates, third-party advertisers, election workers, and voters by overseeing ballot and technology preparation; coordinating supply chain management and vendor selection;

performing security reviews; preparing election reports; revising voters' lists; overseeing compliance audit committees (CACs); and responding to possible prosecutions. In many Ontario municipalities, this work may be done by one or two people.

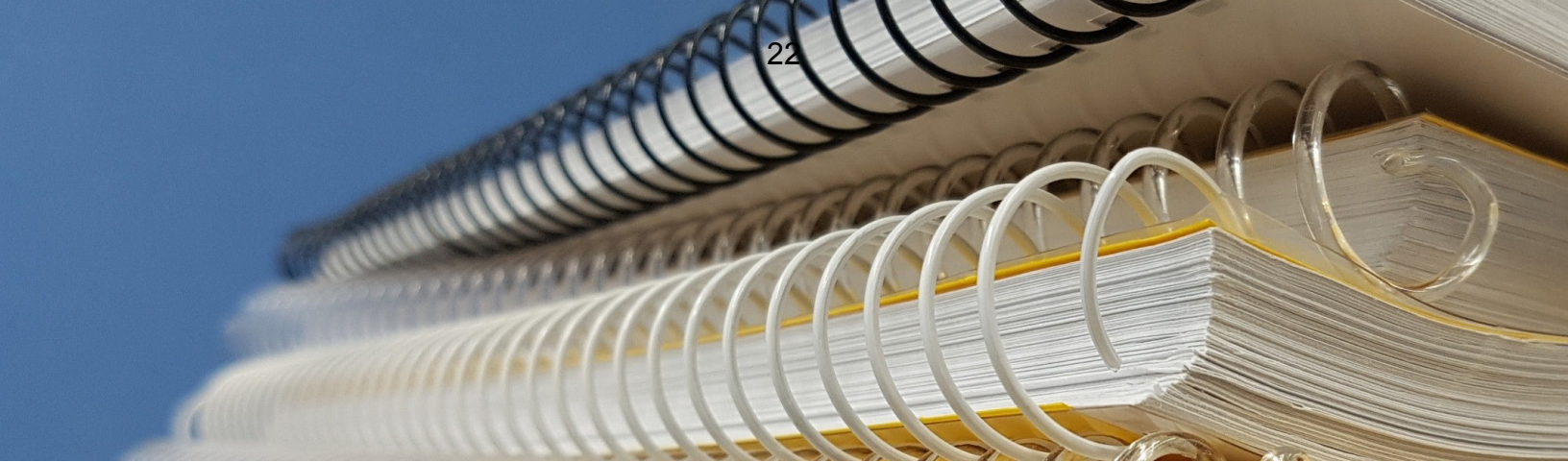
Election administrators take pride in executing fair, accountable, transparent, accessible, and reliable local elections and are always looking for ways to continuously improve the delivery of these important services. An updated *MEA* would allow election administrators to do their jobs more efficiently and effectively while providing needed clarity to local candidates, third-party advertisers, voters and the general public.

To ensure administrators can pivot and implement legislative changes without impacting planning for the 2026 municipal elections, we urge the Province to act swiftly to consult on, then enact the following recommendations and updates to the *MEA*.

[†] While there are 444 municipalities in Ontario, 414 hold elections. The other municipalities are upper tiers, representatives for which are elected or appointed through lower tiers locally.

⁸ Association of Municipalities of Ontario (AMO). "Analysis of 2022 Municipal Post Election Data", 14 Nov. 2022. <https://www.amo.on.ca/policy/municipal-governance-indigenous-relations/analysis-2022-municipal-post-election-data>

⁹ Ontario Education Services Corporation. "Post Election Data," 1 Nov. 2022. <https://elections.ontarioschooltrustees.org/Resources/pdf/2022Data/Post-Election%20Data%20-%20All%20School%20Boards.pdf>



Overview of the Issues

Strengthening
Public Trust &
Electoral Integrity

As outlined in the introduction, the *MEA* in its current form needs to be comprehensively reviewed in consultation with the sector and re-written. Processes can be streamlined, rules improved, provisions re-ordered, and clarity brought forward to ensure that voters, residents, candidates, third-parties, interest groups and election administrators have a modern act that is clear and consistent, while ensuring that processes are accountable and transparent.

Enhancing
Accountability
& Transparency
while Making
Compliance &
Enforcement
Easier

Some of the top concerns identified by AMCTO members include the current legislation containing a patchwork of amendments, repealed sections, and transitional provisions that are no longer relevant. On top of this, there are other structural issues in the how the Act is laid out, that make it difficult for voters, candidates, and organizations to understand and manage. Often a clause in one section must be read with a clause in another section, or within another act, which makes reading and complying with the rules difficult to do.

Permissive
Legislation
that Reduces
Administrative
Complexity

Another significant issue has been the lack of harmonization of local election rules across the three Acts (*MEA*, *Assessment Act*, *Education Act*) that set out the complex rules for municipal and school board elections. School board trustee candidates and voters must interpret three pieces of legislation to understand their qualifications. Moreover, because school support has two purposes under legislation – election and assessment – outdated legislative requirements make it difficult to match school support to voters which can mean delays at the polling station.

Rules on campaign finance and third-party advertising are also complex and difficult to oversee and enforce. There needs to be a thorough review of both frameworks to streamline rules and introduce mechanisms to make enforcement more efficient. This must include examining enforcement such as the compliance audit process, offences, and penalties.



Recommendations

The *MEA* will be 30 years old when the next scheduled municipal and school board elections take place in October 2026. While there have been a few changes to the *Act* since the last formal review, the current mix of political, environmental, social, technological, and legal factors make this an opportune moment to modernize the *Act*.

A review and re-write of the *Act* should also include a concurrent review of relevant sections of the *Education Act* and *Assessment Act* which contain provisions that add further complexity to the local election picture.

General Recommendations

- 1. Overhaul and update the *Act* to ensure that it is future-proof, addresses current gaps, streamlines rules, and brings added clarity well ahead of the 2030 election.**

While it may not be possible to complete a top-to-bottom re-write and re-design of the *Act* ahead of 2026, AMCTO is calling on the Province to launch consultations and engage our members to begin the process as soon as possible. The goal is to bring forward brand new legislation by 2028 at the latest, ahead of the 2030 municipal elections. The project planning for this endeavour should begin now, informed by discussions with AMCTO, Elections Ontario, the Municipal Property Assessment Corporation (MPAC) and Association of Municipalities of Ontario (AMO).

A new *Act* would breathe new life into local government elections by rebuilding a fulsome statute instead of relying on the current patchwork of fixes that make the legislation more complicated than necessary. A new *Act* would make it easier for voters, candidates, and third-party advertisers to understand, comply with and participate in democratic processes. A review also provides an opportunity to bring innovation to election administration so that Ontario is looked to as a leader in the local democratic process in Canada.

2. Include a legislative requirement to review the Act after every scheduled municipal and school board election year.

While a comprehensive review should ensure the Act does not become quickly outdated, with the pace of technological and societal change, the MEA will continue to need regular review and updating. We are suggesting that the Act be substantially reviewed at least every four years with a specific legislative requirement to do so.

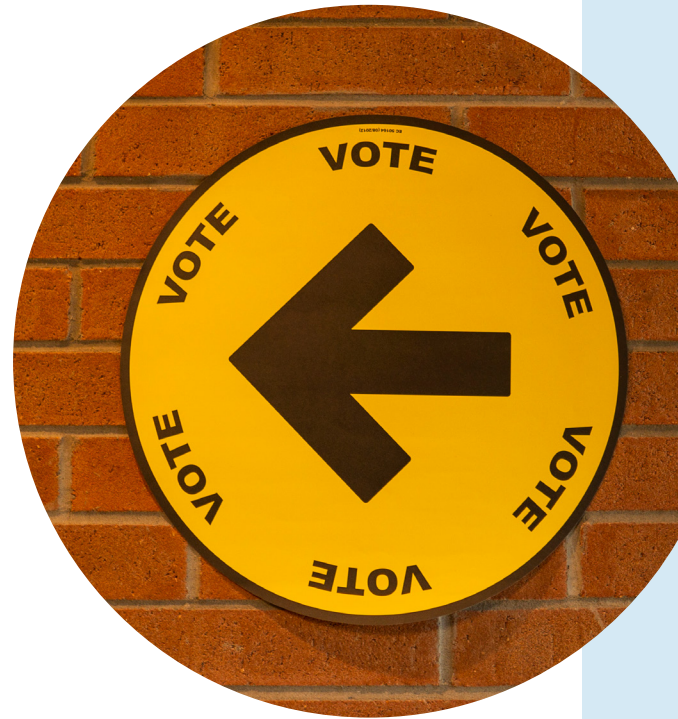
3. Review how the current legislation, regulations, and prescribed forms treat personal information, considering a digital privacy lens.

In the past few years, privacy protection has become increasingly important. With increased vitriol both in-person and in digital public spaces, members of the public, candidates for elected office, and other officials have expressed concern about the protection of personal information. Furthermore, as personal safety concerns have become increasingly alarming, it is essential that steps are taken to protect the privacy of individuals while balancing the need for increased transparency in local elections.

For instance, [several municipalities have passed resolutions](#) calling on the Province to remove requirements to post personal information online including candidate and contributor home addresses¹⁰. Anecdotally, several clerks have noted that they have received requests from those who experienced harassment or violence and consequentially, they do not want their information appearing on the voters' list.

Unlike provincial election legislation, the MEA does not explicitly allow for the redaction of certain information when posting documents online. Section 4.7 of the [Elections Act, 1990](#) gives Elections Ontario, upon request, the authority to redact certain personal information if the Chief Electoral Officer reasonably believes posting the information would endanger the person's life, health, or security. Further, section 4.8 of the *Elections Act* restricts the sharing of names, addresses, and unique identifiers of electors to certain persons.

For municipal election legislation, consider allowing for redaction of personal information or removing the requirement for municipalities to post personal information online while ensuring information is still available to clerks or to any other body to review qualifying addresses for contributions.



¹⁰ See for instance, <https://kitchener.citynews.ca/2023/04/26/region-of-waterloo-asks-province-to-keep-home-addresses-of-local-candidates-donors-private/>

Recommendations to Strengthen Public Trust and Electoral Integrity

Electoral integrity is a core focus of election administration and critical to ensuring public trust. While all recommendations are built on the foundation of electoral integrity, recommendations listed under this theme speak to the need to provide support to electors, residents, and administrators in this endeavour.

Priority Recommendations

1. Amend the Act to include a preamble that captures the principles of elections recognized by the court and the intended outcomes of the Act.

One way to enhance the clarity of the *MEA* is to ensure that the text matches core guiding principles of elections.

As we noted in our [2015 submission](#)¹¹, in *DiBiase v. Vaughan (City)*, 2007, the Honourable Justice Peter Howden of the Ontario Superior Court wrote that in making its finding, the court relied upon the principles articulated in a previous Supreme Court of Canada ruling (*Haig v. Canada*, 1993), specifically that:

- The secrecy and confidentiality of the voting process is paramount;
- The election shall be fair and non-biased;
- The election shall be accessible to the voters;
- The integrity of the voting process shall be maintained throughout the election;
- There is to be certainty that the results of the election reflect the votes cast;
- Voters and candidates shall be treated fairly and consistently; and
- The proper majority vote governs by ensuring that valid votes be counted, and invalid votes be rejected so far as is reasonably possible.

These principles are fundamental to the administration and exercise of elections at all orders of government in Canada. They are in fact, central to the *MEA* itself, and should be embedded in the Act.

2. Establish a mechanism that permits the Minister of Municipal Affairs, in consultation with affected communities, to alter municipal and school board election day if it falls on a day of cultural or religious significance.

The 2022 municipal and school board election day fell during Diwali, an important festival observed by many communities across the province. In future years, it could be the case that election day falls on another culturally or religiously significant festival or event.

While many municipalities provide advance voting opportunities, local elections rely on volunteers as well as municipal staff to support election day activities including running voting locations.

¹¹ See <https://www.amcto.com/sites/default/files/2023-05/AMCTO-MEA-Submission.pdf>



Candidates for office may also be impacted as they may wish to be with family and friends during these special occasions. For residents and staff of the impacted communities it can be a difficult decision to choose between missing personal celebratory commitments or missing an important democratic process. This could be a contributing factor to lower voter turnout and election staffing resources.

Section 9.1 (6) of the [Ontario Election Act, 1990](#)¹² contains a mechanism through which an alternative day can be chosen for provincial elections. A mechanism for selecting an alternative day is needed for local elections, however the selection of a suitable alternate day should not be left to individual clerks as there is a policy imperative that municipal and school board elections must be held on the same day across the province.

Moreover, as clerks need ample time to ensure that they can plan and execute elections, the selection and communication of an alternate date would need to be done well in advance, at least by the January in the year prior to the year of the election, if not earlier.

3. Amend the Act so that, if requested, schools and institutions must allow space for advance polls and voting day free of charge.

To facilitate in-person voting, municipal clerks and their staff require large, central, and accessible locations to host voters on advance voting and election days. Often, the best facilities are local schools. While the MEA allows clerks to use certain buildings, including schools, as voting locations ([section 45\(4\)](#)), health and safety concerns often cited by school administrators make the location selection process less seamless than it should be.

While school boards are required to provide space on election day, clerks often face administrative difficulties in securing these spaces. For example, we have heard from members that some school administrators request that municipalities hire security personnel or may not provide access to facilities such as washrooms, or access to school staff during election day, and some refuse access altogether. This leaves clerks with challenges confirming voting locations and without the enforcement tools to secure these spaces.

Additionally, all electors should have access to voting in multiple locations on all voting days. As per the [definition in section 5 the MEA](#)¹³, “voting day in a regular election is the fourth Monday in October” which does not specifically include advance voting opportunities. For instance, schools can currently say no to advance polls, or can charge a permit fee. The Act should be changed so that schools must allow advance polls if requested, and free of charge.

On election day, institutions like long-term care homes become polling locations for the Province’s most vulnerable electors. However, there may be issues with accessing these locations because of outbreaks or other circumstances, which can make casting votes more difficult. Explicitly allowing voting to take place in institutions and schools on advance voting days allows clerks to provide more electors more choice in when and where to cast their ballots.

¹² See the *Election Act, R.S.O. 1990, c. E.6*

¹³ See section 5 in the *Municipal Elections Act, 1996*

4. Require school boards to schedule one of the provincially required Professional Activity (PA) days on municipal and school board election day.

Further to the above, enhancing safe schools on voting day is a priority for everyone. This goal can be achieved by reducing the number of people in schools. To do this, one of the mandatory PA days should fall on election day and while some school boards practice this, there remains inconsistency across the province.

AMCTO previously shared an analysis of locally scheduled PA days that showed that moving PA days every four years to coincide with municipal election days is unlikely to be a significant burden for school boards as there is a pattern of October PA days. School boards should be required to schedule one of the provincially mandated PA days on municipal and school board election day to facilitate the election of their own representatives and so that election administrators can focus on providing safe electoral services.

Ahead of the 2022 municipal elections our Association [made formal requests of school boards](#) to schedule one of the mandatory PA days on election day¹⁴. We also asked that these dates be included every four years as part of the annual school year calendar development.

Following this advocacy push, we were pleased to see an increase in the number of school boards that scheduled a PA day in 2022, with [encouragement from the Ministry of Education](#)¹⁵. However, this remains an issue for future elections, requiring a permanent, reoccurring solution.



Secondary Recommendations

5. Remove the requirement for employees of a municipality or local board to provide notice of their intention to stand for election to council.

There are areas where the rules and guidance within the Act should provide more certainty to candidates and to electors to facilitate their participation in local democracy. Potential candidates for municipal office, who happen to work for a municipality or a local board, should be provided the same, equal opportunity as other candidates who are not required to declare their intentions until they submit their paperwork. Municipal staff are responsible to their employer and so should follow established HR protocols for taking leave. By removing the requirement for municipal employees to provide council with notice of their intention to stand for election, all candidates can be treated fairly.

¹⁴ See AMCTO letter, September 2021, to School Board Directors of Education & Board Chairs re PD Days <https://www.amcto.com/letter-to-school-boards-re-PD-days>

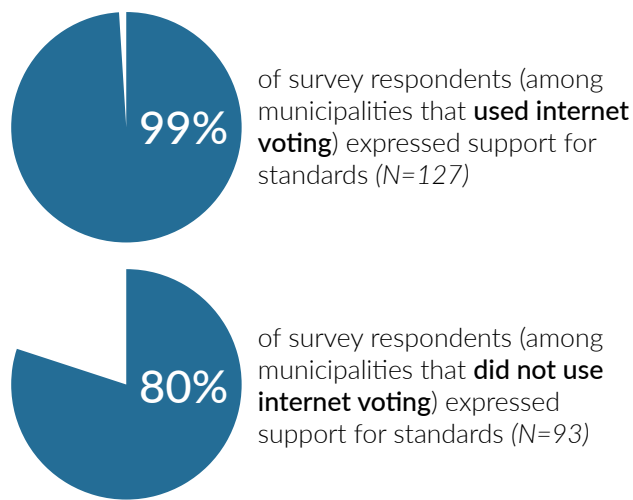
¹⁵ See AMCTO Advocacy Update, September 2022, re Progress on Professional Development (PD) Days on Municipal and School Board Election Day <https://amcto.informz.net/informzdataservice/onlineversion/pub/bWFpbGluZ0luc3RhbmNISWQ9MTA3NTYwODQ=>



6. Clarify the Act to reflect that a voter's absence from work may be on any day voting is available (i.e. advance voting days).

Like the issue noted above about the definition of voting day in [section 5](#) of the MEA, it should be made explicit that any elector can be absent from work to exercise their right to vote on any day voting is available. The current definition of voting day is limited to election day only and could be read to exclude advance voting days, days that may be more convenient to voters for casting their ballots and participating in the democratic process.

7. In consultation with AMCTO and other municipal stakeholders, consider how the work by the [Digital Governance Standards Institute](#)¹⁶ related to electronic voting may be formalized to support election administration in Ontario.



Survey data collected through AMCTO's 2022 Post-Election Survey

Work is already underway to develop voluntary standards on [voting technology](#)¹⁷ and [electronic voting](#)¹⁸. Municipal professionals from across Ontario have engaged with the committee undertaking this work. With an increasing number of municipalities considering e-voting methods for ease of meeting voters 'where they are', there should be a provincial interest in adopting voting standards.

Overwhelmingly, respondents to our 2022 Post-Election Survey support internet voting standards. The responses also suggest more municipalities would consider this method of voting if there were standards in place. The right training and supports would need to be

What our Members are Saying:

"Standards would ensure consistency in format, security, etc. across vendors."

"[Voting standards] would ensure a province-wide standard for security and operational experience."

"There are standards set out for paper voting in the MEA. There should also be a standard for electronic voting as it is now left to the municipality and vendors. It may provide further confidence in these systems."

¹⁶ See <https://dgc-cgn.org/>

¹⁷ See <https://dgc-cgn.org/standards/find-a-standard/voting-technologies/>

¹⁸ See <https://dgc-cgn.org/can-dgsi-111-public-review-for-online-voting-standard-now-open/>



in place to ensure that municipalities, vendors, and other interested parties fully understand the standards and their responsibilities.

Moreover, decisions about voting methods should always be left to the municipality to decide. Whereas online voting may be beneficial in some regions of the province, it may not be the best method for others given costs, technological support and access to broadband.

Ultimately, voting standards would empower municipalities to select the best voting method(s) for them and their communities. Consider how these standards may be formalized to support election administration in Ontario.

Long-Term Recommendations

8. **Establish a working group with AMCTO and other municipal stakeholders to inform the development of a regulation for electoral definitions of “tenant”, “spouse of a non-resident” and “occupancy”.**

Municipal elections have unique eligibility rules tied to property and tenancy status that make these terms important and unique. The current definitions provided in the *Act* are not sufficiently clear, and create potential confusion for electors, candidates, and administrators. We raised this [concern in 2015](#)¹⁹ and legislative changes in [2016](#)²⁰ brought forward regulation-making authority to consider a definition of tenant for electoral purposes. However, regulations are not yet in place.

The lack of definition about occupancy, control, possession and tenancy remains a significant gap municipal clerks must deal with related to voter qualification with many claiming to be eligible based on a lease of “properties” such as parking spots, sheds on land, as well as various seasonal properties such as RV parks and leased cottages. Providing a clearer definition of “occupancy”, “control”, “possession”, “tenancy”, and “spouse of a non-resident” is important to all municipalities, but more so in communities where qualifications based on residency and property are muddled such as in cottage country and rural Ontario. There are unique eligibility rules at the municipal level that make clear terminology important.

¹⁹ See <https://www.amcto.com/sites/default/files/2023-05/AMCTO-MEA-Submission.pdf>

²⁰ See <https://www.ola.org/en/legislative-business/bills/parliament-41/session-1/bill-181/debates>

For example, Wollaston Township experienced issues with lack of clarity on qualifications and in 2020 called for the Province to close loopholes on property qualifications and leases in what they called “pay for play schemes”²¹. The resulting council resolution received support from several other municipalities.

Providing this clarification for electoral purposes will help clerks ensure that tenants entitled to vote can do so, and those who believe they may be entitled to vote (but are not under law) can obtain needed clarity. Our Association can be a willing partner to assist in developing these regulations.

Recommendations to Enhance Accountability and Transparency While Making Compliance and Enforcement Easier

This section contains recommendations that speak to fairness, accountability, transparency, and key principles to ensuring the integrity of elections. This section contemplates making compliance with electoral rules easier to follow for candidates and where these rules are deliberately broken, suggests recommendations that allow efficient enforcement of remedies and penalties. As the local “Chief Electoral Officer”, the clerk should have the authority to make decisions about administrative and operational matters. This will ensure that there is no real or apparent conflict for council members who may be standing for election while making decisions about the electoral process. This may also help to improve overall municipal staff-council relations.

Priority Recommendations

1. Remove the 25-signature endorsement requirement.

Everyone has the right to stand as a candidate for election if they meet the qualifications set out in the relevant Acts. However, particularly in larger urban municipalities, candidates often run for office without any intention of campaigning, without setting out policy proposals, or legitimately participating in the democratic process.

The [original intent behind this provision](#) of obtaining a 25-signature endorsement was to try to reduce frivolous candidates from ending up on the ballot which could result in split votes²². Ultimately, requirements for 25 signatures in medium and large municipalities have not addressed this issue as signatures are easy to collect with a declaration that signees are eligible electors. This does not dissuade people from launching non-serious campaigns and adds an administrative burden for election administrators who must review and attempt to check required information on candidate forms and eligibility.

²¹ Wollaston Township. Letter to Minister of Municipal Affairs and Housing with Council Resolution. Dated September 16, 2020.

²² Ontario. Legislative Assembly, *Hansard*, 41st Leg, 1st Sess, No 158 (11, April 2016) at 1440. <https://www.ola.org/en/legislative-business/house-documents/parliament-41/session-1/2016-04-11/hansard#para577;~:text=Some%20people%20have,than%20100%20votes.>



2. Investigate incentives to support genuine candidacy while addressing frivolous campaigns, including the nomination filing fee refund.

Instead of the 25-signature requirement, the Province should look at other ways to support serious candidates while disincentivizing non-serious candidates. The current process of refunding anyone who files a financial statement is ineffective at dissuading frivolous candidates and there may be better mechanisms to ensure compliance with campaign finance rules.

Potential areas to explore are nomination fee refund eligibility to candidates who receive a certain vote share or removing the right to receive a refund of the nomination filing fee if the financial statement is not filed on time. Consideration should be given to whether certain rules favour incumbents as opposed to their challengers. Overall, there must be a balance between supporting genuine candidacy, reducing administrative burden, and applying penalties to those who deliberately skirt electoral rules.

3. Amend the Act so that no candidate shall accept a contribution over \$1,200 from a single resident.

While we recommend reviewing the campaign finance framework in its entirety (see long-term recommendations in this section), the Province should immediately review the Act to identify and close loopholes in campaign finance rules.

For example, [subsection 88.9](#)²³ prohibits individuals from contributing over \$1,200 to a single candidate, however there is no complementary provision that explicitly prohibits a candidate from accepting such a contribution. Contributors are not necessarily familiar with the Act in the same way candidates are, and with the Act in its current form, the rules around contributions are not easy for residents to understand.

4. Clarify that any resident of Ontario may submit a compliance audit application, consistent with contribution rules.

There is confusion among candidates and the public about who can submit a compliance audit application. Currently, [subsection 88.33](#)²⁴ states that an elector who is entitled to vote may make an application, but it is not clear whether an elector must reside in the municipality in which they are making an application. This has been [raised and challenged most recently](#)²⁵ in the Ontario Superior Court of Justice, where an Oakville candidate appealed an elector's request for an audit of their finances, stating that the elector resides in a different ward than them, and is therefore ineligible to file a compliance audit request.

As contributions are open to residents of Ontario (i.e. not limited to electors), there should be a mechanism by which electors as residents of Ontario may seek remedy from the compliance

²³ See ss.88.9 in the *Municipal Elections Act, 1996*

²⁴ See ss.88.33 in the *Municipal Elections Act, 1996*

²⁵ See <https://www.oakvillenews.org/local-news/ward-7-councillor-nav-nanda-appeals-decision-to-audit-her-campaign-finances-8482086>



audit process regardless of where they reside. If applications are not frivolous and vexatious, any resident of Ontario with the means of seeing through an application should be able to bring one forward to ensure the integrity of the electoral process.

5. Consider setting one 90-day period for compliance audit applications for initial and supplementary financial statements to simplify the process.

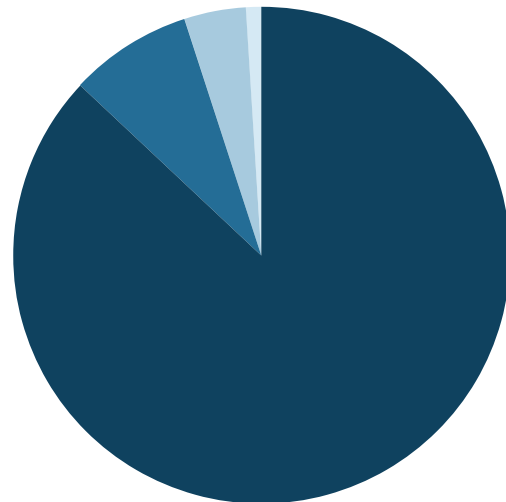
The current structure creates many overlapping deadlines which is challenging to communicate to electors, the public, and for municipalities and school boards to track. This becomes more challenging in larger municipalities with hundreds of candidates. Streamlining application deadlines will make communication, administration, and compliance easier.

6. Roll the review of contributions and over-contributions to candidates and third-party advertisers into the Compliance Audit Committee (CAC) process and permit the committee to decide whether to commence a legal proceeding against a candidate or third-party advertiser for an apparent contravention.

Consistent with our recommendations on [Bill 181 to Standing Committee](#)²⁶ in 2016, having municipal clerks review contributions to candidates and third-party advertisers is problematic for a number of reasons:

- The CAC already exists to review financial statements
- The current process jeopardizes the independence and the impartiality of clerks during elections
- The current process places clerks in potential conflict with members of council
- Most municipalities do not have mature electronic filing systems for candidate and third-party advertiser financial statements
- The current process imposes additional administrative and resource burden on clerks who are already busy running local elections

Rolling the review of contributions into the established mandates of CACs would also allow an elector to make an application and is a more effective way to ensure candidate and contributor accountability.



How does your municipality determine whether any contributors exceed the maximum allowable amount? (N=220)

- Clerk's office fulfilling it (192)
- Finance department fulfilling it (17)
- Other (8)
- Using an external consultant (3)

Survey data collected through AMCTO's 2022 Post-Election Survey

²⁶ See <https://www.amcto.com/sites/default/files/2023-05/AMCTO-Bill-181-Committee-Presentation-Deck.pdf>

The CAC process has traditionally not received much attention. However, the process is an important element of accountability in local elections and is [starting to receive more public discussion](#)²⁷.

Providing the CAC with explicit authority to decide whether to commence a legal proceeding against a candidate or third-party advertiser could reduce applications made to the courts for review of CAC decisions.

Consider improving the CAC process with accountability, transparency, and operations in mind as countless hours are spent on delivering important post-election processes, which can contribute to overall increased audit costs and continue for years after the election with prosecutions and court reviews.

7. Expand decision timelines for CACs in Subsection (8) from 30 days to 45 days.

Further, in the interest of supporting applicants, election administrators and CAC members with carrying out their responsibilities, the decision-timelines for CACs should be expanded from 30 days to 45 days. This additional time is especially helpful where the CAC process may fall around a holiday (especially in cases of by-elections). 45 days would remain a reasonable decision timeframe consistent with references in other statutes for required meetings.

8. Clarify roles with respect to CACs wherein council is responsible for establishing the committee and the clerk is responsible for making appointments.

The MEA assigns responsibility of administering elections, including establishing necessary policies and procedures, to the clerk. However, there are several sections throughout the Act where the responsibility for what are, in effect, administrative decisions, is vaguely distributed between both council and staff. Administrative responsibilities for elections should rest with the clerk.

For instance, section [88.37\(1\)](#)²⁸ gives council responsibility for “establishing” a compliance audit committee to review potential campaign finance violations. In practice, however, this section has been interpreted broadly, giving council a more expansive mandate that includes appointing committee members. It is not appropriate for council to appoint members of a committee that is created to review the election finances of candidates, some of whom may end up filing as candidates and sitting as councillors. To maintain clarity and objectivity, all administrative responsibilities related to CACs should reside with the clerk.



²⁷ Coyne, Andrea and Andrew Lawlor. “Building voter confidence in the municipal electoral process,” *Policy Options*. 21, Feb. 2024. <https://policyoptions.irpp.org/magazines/february-2024/municipal-elections-safeguards/>

²⁸ See section 88.37(1) in the *Municipal Elections Act, 1996*



Secondary Recommendations

9. **Clarify the role of scrutineers where alternative (unsupervised or remote) voting is in place and collaborate with AMCTO and others on the definition of scrutineer and what they may or may not do.**

The process of scrutineering is changing in every municipality that incorporates the use of internet voting into their election. As voting in the digital age is no longer neatly contained to recreation centres, school auditoriums or church basements, the rules are not as clear as they once were. The Act provides significant attention to the role of scrutineers during an election, ensuring that candidates are permitted to appoint a scrutineer for each ballot box and voting place. But what happens when there are thousands of polling places and no formal ballot box? There is currently no clarity about how election results can be scrutineered in jurisdictions that use online or alternative voting methods. This is a gap in the current process that needs to be addressed.

10. **Review the scope of election offences and related penalties to address gaps. Consider providing support and guidance to clerks on best practices for implementation and enforcement of serious offences.**

Offences and related penalties should be reviewed. More specifically, for the coercion or intimidation of an elector, preventing or impeding an elector from voting, and from false representation or aiding a person in committing offences. A review needs to address these gaps - many of which are a result of changes to technology.

In consideration of new offences and related penalties, the Province must of course consider the burden of proof and enforceability of penalties for such offences. The Province should also provide more support and guidance to clerks on best practices for implementation and engaging law enforcement for the more serious offences.

Long-Term Recommendations

Due to gaps in rules and penalties, the lack of standardization of compliance audits, and the [increased use of the courts](#) to review compliance audit committee decisions²⁹, there has been increased frustration among administrators and an inconsistent approach to post-election activities meant to ensure transparency and accountability. As an Association, we have highlighted several of these member concerns about role clarity, conflict of interest and capacity issues.

Not only is the current process frustrating for municipal staff but for candidates who are not clear on their responsibilities. This can also be frustrating for residents and electors who are doing their due diligence in holding candidates accountable for improper activities. If the rules are not clear, and the process becomes convoluted, why would anyone participate in the electoral process?

²⁹ Coyne and Lawlor.



11. Establish a working group with AMCTO and other municipal partners to review and improve the campaign finance framework, including rules, guidance, forms, processes, and penalties.

While we have put forward several recommendations as interim measures to address financial issues, there remain underlying concerns that only a full review of the campaign finance framework can properly address.

Whether it is on the campaign finance framework or the below noted third-party advertising framework, there needs to be a balance struck: any new rules should avoid making it difficult for people to participate in local democracy. Making compliance easier while also ensuring that there is proper accountability, makes the rules and processes easier to enforce and to prosecute where rules have been broken.

Given the complexity of administration, compliance, and enforcement, a wider conversation about these frameworks is needed with our members and other stakeholders to understand the issues, challenges, and opportunities from varying perspectives. Together, we can co-design a framework that benefits everyone.

12. Establish a working group with AMCTO and other municipal stakeholders to review and improve the third-party advertiser regime for ease of compliance and enforcement.

Similarly, the third-party advertiser framework needs to be updated and improved. The [current measures were introduced](#) to regulate third-party advertising, which includes contribution and spending limits, and to help create flexibility for groups doing advocacy work throughout the campaign period³⁰. However, there remains room for improvement, including better defining qualifications for third-party advertisers. Improvements should ensure the regime is less cumbersome and easier for advertisers, administrators, and compliance audit committees to comply with and enforce.

13. Within the campaign finance and third-party advertiser frameworks, review the mechanisms for enforcement, and related penalties to address gaps in accountability and transparency measures.

Related to our secondary recommendation in this section, there are gaps in penalties related to overcontributing to a candidate's own campaign and accepting overcontributions from residents. There are nuances within the legislation that must be considered as well. For instance, there should be assurances that changes to campaign finance rules and penalties are balanced with the ability of candidates to pay off campaign debts.

Ultimately, a review of the campaign finance and third-party advertising frameworks, along with the compliance audit, offences, penalties, and enforcement processes must be looked at holistically as these are intertwined with changes to one section or subsection potentially requiring subsequent changes elsewhere in the Act.

³⁰ Ontario Newsroom. Ministry of Municipal Affairs and Housing. Backgrounder. June 7, 2016. "Changes to the Municipal Elections Act," Accessed: <https://news.ontario.ca/en/backgrounder/39111/changes-to-the-municipal-elections-act>.



14. Consider increasing maximum campaign spending limits and its related formula to consider inflation outlined in O Reg 101/97.

The Province should consider revising the spending limit formula in [Ontario Regulation 101/97](#)³¹ which has been stagnant since 2018 and does not consider inflationary pressures on campaign costs.

15. Explore establishing an independent office to manage investigation and prosecution of offences under the Act.

Local election administration enforcement is nuanced and often differs municipality to municipality as does capacity and resourcing, whereas federal and provincial elections are administered by one centralized body. In reviewing the campaign finance, third-party advertising and enforcement frameworks in the *MEA*, the Province should also consider promising practices from election administrators at other levels of government, such as an independent office like the Commissioner of Canada Elections.

Municipalities face challenges proceeding with prosecutions under the *MEA*. For instance, the conflicting nature of local police governance is responsible for the investigation of criminal activity, and municipal elected officials sit on these police boards. Anecdotally, in instances where local forces are engaged, they have recused themselves and referred matters to the Ontario Provincial Police (OPP) who may or may not involve themselves in local matters. Barring a provincially appointed official, more clarity around *MEA* offences being investigated by the OPP would help address existing concerns.

Similarly, prosecution through the courts is a time-consuming process that can take multiple years to get to trial, the process for which takes up staff time and resources to prepare for, prosecute, and await judgement before applying penalties.

A separate body could allow for an alternative dispute resolution mechanism with procedures that are applied consistently across municipalities. This would remove potential conflicts and friction between municipal staff as election administrators, candidates, and members of council who may have contravened the *Act*, leading to quicker resolutions. At the provincial-level for instance, the [Election Finances Act, 1990](#)³² includes mechanisms such as referrals to the Ministry of the Attorney General for prosecution and the use of administrative monetary penalties.



³¹ See section 5 of O.Reg 101/97 under the *Municipal Elections Act, 1996*

³² See the *Elections Finances Act, 1990* <https://www.ontario.ca/laws/statute/90e07>



Recommendations to Reduce Administrative Complexity

AMCTO supports modernizing legislative and regulatory environments that enable the work of municipal public servants, while allowing innovation with policies and practices that reflect current needs and focuses on outcomes.

Legislation needs to strike the right balance between providing clear rules and frameworks to ensure the integrity of the electoral process, while also reducing administrative and operational burden for municipal staff. Local election administrators need to be able to run elections in a way that responds to the unique circumstances of their local communities. Thereby, providing the right rules and frameworks for administrators will result in benefits for electors, candidates, advertisers, and others involved in local elections.



Priority Recommendations

- 1. Bring the language of the Act and regulations into the 21st century by removing gendered references and including references to encompass all voting methods.**

To ensure more inclusive language within the Act, the Province should remove gendered references. Clerks receive complaints from non-binary persons about the use of language in the Act which they feel is exclusionary. Moreover, as more municipalities are turning to alternative voting methods to reach voters and run efficient elections, language in the Act across numerous sections and within regulations should encompass all voting methods rather than referring to traditional paper ballots or in-person voting. Changes are required in sections 43, 47, 48, 49, 52, and 89, among others.

- 2. Ensure all definitions that appear in the Act are captured in and limited to Section 1 and update definitions to add clarity.**

One way to improve clarity and interpretation is to ensure that all key terms are captured in the definition section of the Act. There are several instances wherein a definition appears later in the legislation while others are captured in the definition section. Definitions for several terms also require clarity. For instance, municipalities are left to define "retirement homes" resulting in inconsistencies across municipalities. As we have noted elsewhere in this submission, definitions of "tenants" and "occupancy" also lack clarity.

It is also important that language clarifies the definition of "municipality" so that it consistently applies to operational and administrative tasks undertaken by municipal administration, whether by the clerk or other municipal staff.

3. Clarify references to municipal business hours as well as dates that constitute a weekend or holiday as defined pursuant to the *Legislation Act, 2006*.

Candidates, voters, and other interested parties are not familiar with the traditions and nuances of legislation and regulations. Without a reference to other legislation, voters and candidates are unlikely to know that they should refer to the *Legislation Act* for definitions. Moreover, it should be clarified that references to specific deadlines within the *Act* are to reflect regular municipal business hours especially where these hours may fall on weekends and holidays.

4. Move nomination day to July, shortening the campaign period to be more consistent with federal and provincial nomination periods.

As noted previously, local elections are complex multi-year projects often undertaken by a handful of municipal staff who are also responsible for numerous other statutory and operational responsibilities. In 2020, the [nomination period was extended to August from July](#)³³. Extending this period runs contrary to the changes the Province made in 2016 [shortening the nomination period](#)³⁴. Furthermore, the municipal nomination period is longer than those at the provincial and federal levels where this process is managed by agencies whose sole focus is election administration.

Shortening the length of the nomination period would give municipalities more time to prepare ahead of the election. There is significant strain on municipal staff and resources with longer nomination periods, with legislative and business deadlines for printing ballots, quality assurance, security, and testing, among other activities. While this may sound straightforward, municipalities are often working with tight, limited supply chains and vendors, and in larger municipalities, staff are often dealing with multiple ballot types, and in many cases, managing hundreds of candidates. A longer nomination period means there is less time between the close of nominations and the first day of voting to finish the nuanced tasks and activities required of local elections.

Longer elections are more expensive for candidates, harder to run for administrators, and can be a potential cause of fatigue from an already disengaged electorate. Moving the nomination period back to at least July would make the nomination period shorter, while also giving candidates in smaller municipalities—who may still be working full-time jobs with less sophisticated campaign infrastructure—enough time to campaign.

5. Enable clerks to determine what voting method is best as the local chief electoral officer and align timelines related to clerk's procedures.

[Building on the updates made in 2016](#)³⁵ which began to untangle council's role in election administration, the *Act* should be updated to authorize the clerk to choose what voting method is best. Requiring council to pass bylaws on voting methods in section 42 gives council members and the public the impression that council is responsible for election administration issues.

³³ See <https://www.amcto.com/network-community/blog/advocacy-update-bill-218>

³⁴ See <https://news.ontario.ca/en/release/39113/ontario-passes-legislation-to-allow-ranked-ballot-option-for-municipal-elections>

³⁵ See section 41(4) of the *Municipal Elections Act, 1996*.



[Section 42](#)³⁶ should further be amended to resolve the conflict in timelines between when procedures need to be completed and when they must be provided to candidates. For instance, June 1st is the deadline for the procedures in a regular election year, but 42(3)(b) requires these must be provided when a candidate files their papers, which could be as early as May 1st.

6. Change the timeline for proxy appointment to begin September 1st for a regular election.

A similar timeline alignment issue occurs between making the voters' list available to voters to confirm if they are on the list and/or update their information and the appointment of proxies. In the 2022 election, the first day for proxy appointment was August 22nd. However, the voters' list was not available until September 1st. In this scenario, staff were not able to necessarily confirm whether an individual appeared on the voters' list as a qualified elector until September 1st. Thus, allowing proxy voters to be appointed earlier than receipt of the voters' list is problematic.

In the case of a by-election, consider changing the timing for proxy appointments to when the clerk has made corrections.

7. Expand the timeline for reporting on accessible elections from 90 days to 120 days.

[Section 12.1 \(3\)](#)³⁷ requires the public posting of a report about the identification, removal and prevention of barriers that affect electors and candidates with disabilities within 90 days of voting day. We recommend that this be extended to 120 days. Providing additional time to municipalities would allow them to look at reporting on the election holistically in one comprehensive post-election report that includes factors impacting accessibility.

8. Consider aligning the spending limit certificate requirements and timelines between candidates and third-party advertisers for consistency.

The Act states that candidates are to receive the certificate of permitted amounts of their own expenses and contributions to their campaigns upon the filing of their nomination forms. The MEA does not require the certificate for maximum amount for parties, etc., after voting day to be issued until or before September 30th along with all final certificates. In comparison, third-party advertisers are to receive the certificate of maximum amount for parties, etc., after voting day upon filing their Notice of Registration. Providing consistent timelines across various participants in the electoral process makes it easier for municipal staff to adhere to legislative requirements and ensure that candidates and parties are adhering to timelines.



³⁶ See section 42 of the *Municipal Elections Act, 1996*.

³⁷ See section 12.1(3) of the *Municipal Elections Act, 1996*.

9. Update existing provincial guides and forms and provide additional guidance to voters, candidates, third-party advertisers, and election administrators.

The following points outline areas where we believe further clarification can be provided to ensure continued progress, transparency, and accountability in local election administration.

Voters' Guide

- Include more details on voter identification (ID) requirements to provide clearer information about acceptable ID.

Candidate and Third-Party Advertiser Guides

- Specify the documentation that can be accepted as proof an individual is authorized to act on behalf of a trade union for third-party advertising purposes.
- Clarify whether promoted social media posts count as third-party advertising.
- Provide clarification on whether contributions can be sought via platforms such as GoFundMe that process online payments.
- Add further clarity in candidate guides on how to interpret the Act from a campaign finance perspective (i.e. using personal credit cards to reimburse campaign expenses, setting up and managing banking accounts) and where to seek advice for filling out the required forms.
- Add content to guides related to individuals who are supported by their corporations/organizations and stipulate that in these cases, campaign volunteers could be perceived as 'in-kind' contributions. Any stipends provided to volunteers should be captured in financial documents.



Forms

- Ensure clarity and consistency regarding the use of a single name on the ballot under [section 41 \(2\)](#)³⁸. Nomination forms allow the use of a single name on the ballot while section 41 does not provide guidance on how names should be listed on the ballot.
- Conduct extensive external-to-government systems testing of provincial government forms to ensure they are accessible and useable. Our members advised of candidate challenges with downloading and filling in prescribed forms as they were in a format that was not supported by their computer system. We understand that several municipalities raised this issue with the Ministry of Municipal Affairs and Housing (MMAH), but no remedy was applied.
- Update Declaration of Identity - Form 9 so that it can be used to serve voters who have no identification (e.g. those who may be homeless, seniors who have not updated their government-issued identification, etc.)

³⁸ See section 41(2) of the *Municipal Elections Act, 1996*.

Secondary Recommendations

10. Extend the timeline to submit final changes to the voters' list from 30 days to 60 days.

[Section 27\(2\)](#)³⁹ requires that the final changes clerks make to the voters' list be submitted 30 days following election day. In the post-election period, it can be challenging for clerks to meet this deadline given that they are busy managing orientation and onboarding of councillors as well as handling compliance activities. In larger municipalities where thousands of revisions are processed during the election period, it is very challenging to meet the current 30-day timeline. It has never been clear from an operational perspective why this must be done in 30 days. 60 days would provide clerks with a more reasonable post-election timeline to account for and submit final changes.

11. Consider extending discretion to remove a name from the voters' list and the correction of errors to voting day.

The Act should be clear that if the clerk is satisfied, a correction can be made regardless of when that is. A similar mechanism should be included regarding school board support especially where an elector has completed a declaration. This would facilitate a smoother experience on election day for electors whose information may not be correct.

AMCTO's advocacy efforts⁴⁰ to fix the voters' list resulted in Elections Ontario taking over responsibility for a single register of electors, consolidating elector information across the province and removing overall responsibility from MPAC, which retains responsibility for school support data. We are hopeful that in 2026, the first election in which voters' lists will be compiled using Election Ontario's information, there will be a significant improvement in data quality of the voters' list.

Clerks should be extended the authority to make changes to elector information beyond what is currently allowed under [section 22](#)⁴¹ to update voter information, including school support, on election day, if they are satisfied that the information provided by an elector is correct. Without this authority and as the legislation stands currently, an elector may be unable to exercise their right to vote.

Permitting changes to the voters' list on election day should not prevent any improvement to processes for accepting revisions at the single register or at MPAC's level related to school board support. The end goal should always be to have corrections addressed adequately at all levels to ensure voters have a seamless, quick, and overall positive experience on election day.

³⁹ See section 27(2) of the *Municipal Elections Act, 1996*.

⁴⁰ See <https://www.newswire.ca/news-releases/local-govt-association-applauds-elections-ontario-report-887387112.html>

⁴¹ See section 22 of the *Municipal Elections Act, 1996*.



12. Establish a province-wide registry for MEA offenders, maintained by the MMAH or another provincial body, and provide this registry to election administrators.

The *Act* makes it clear that candidates, contributors, and third-party advertisers are responsible for ensuring that they comply with the *Act*. While the *Act* also requires clerks to certify nomination papers and registrations, clerks do not have the tools or resources such as public and centralized information about electoral histories and sanctions imposed on candidates, contributors, or third-party advertisers. How is a clerk from southwestern Ontario to know whether a candidate or third-party registering in their municipality has been disqualified in northern Ontario?

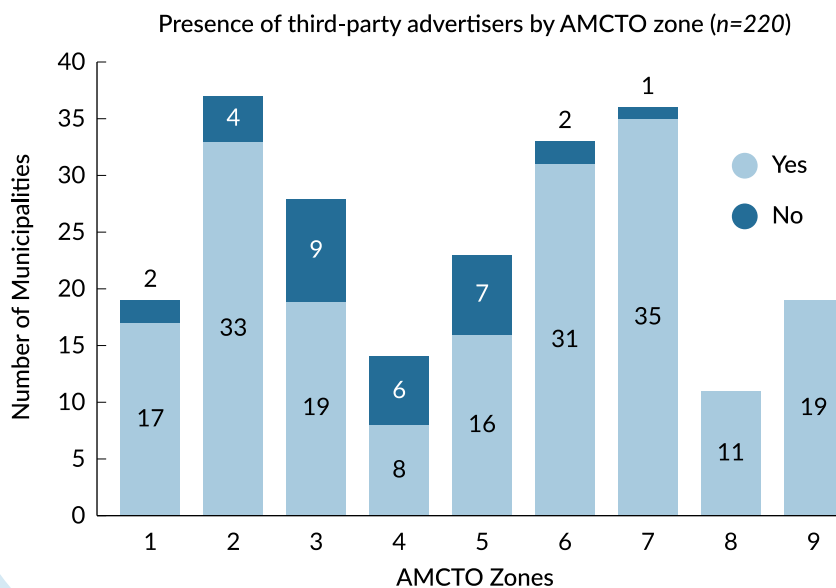
To assist municipalities in completing reviews, there should be a province-wide registry of *MEA* offenders. Such a central repository kept and maintained by a separate body would include information about qualifications, records of compliance audit and court decisions. Information should be available to ensure clerks, compliance audit committees, and others have access to information about those who have contravened the *Act*.

13. Amend the *Act* to consolidate rules between regular elections and by-elections specifying what must be different.

The *Act* provides that by-elections should be conducted “as far as possible in the same way as regular elections”. However, it does not provide further guidance. Are there ways in which by-elections should not run like regular elections? This is an area where the *Act* can be streamlined to clarify, where necessary, what activities may be different in a by-election. This would ensure municipalities are conducting by-elections consistently across the province.

14. Consider a threshold amount for registering as a third-party advertiser that is in line with provincial and federal thresholds.

Third-party advertiser registration primarily occurs in medium to larger municipalities and few, if any, are registered in smaller municipalities.



The entire process from registration to compliance is cumbersome and may prevent smaller actors from engaging in the political process for fear of being labelled third-party advertisers. If the intent is to retain the current framework, amendments need to be made so that there is a line in the sand for who and when someone becomes a third-party advertiser. For instance, is a 'mom and pop restaurant' a third-party advertiser because they hand out flyers for a

candidate at their restaurant? A threshold amount for registering as a third-party advertiser that is in line with provincial and federal thresholds would help ensure local voices without resources can participate without unnecessarily triggering ad status.

Moreover, calculations for third-party spending limits are cumbersome and lack clarity especially for by-elections. The current wording of section 88.21⁴² suggests that the number of electors in the entire municipality, instead of the ward that is the subject of the by-election, is used to calculate spending limits for third-party advertisers. This gives third-party advertisers a disproportionately higher spending limit than candidates in a by-election.

15. Consider amending the deadline for third-party advertiser registration to be more reasonably in advance of an election.

There are also timeline issues with third-party advertising registration. Allowing third-party advertisers to register up to the Friday before election day is problematic from an operations perspective. At this time, municipal staff's attention should be focused on the successful execution of voting and the electoral process, rather than additional paperwork.

16. Require those who file a Notice of Extension of Campaign Period - Form 6 to also file a Supplementary Financial Statement.

Often candidates and third-party advertisers believe that because they did not campaign, raise or spend money in the extended period, they are not required to file a supplementary financial statement even though they filed a notice of extension. This is the interpretation which inevitably causes confusion. Stronger language should be applied to those who file a Form 6 to specify that a Supplementary Financial Statement is required.

Long-Term Recommendations

17. Clarify the process for removing a name from the voters' list by a relative.

Providing the clerk with more flexibility to determine procedures on how a family member may request to remove someone from the municipality's voters' list (provided the clerk is satisfied that the individual should be removed) would assist in the clean-up of municipal voters' lists.

However, we are hopeful that the single register of electors managed by Elections Ontario will improve the quality of the voters' list given that there is one register and duplications should be reduced. The Province could re-evaluate this post-2026 to determine whether any legislative changes are necessary.

⁴² See section 88.21 of the *Municipal Elections Act, 1996*.



18. Decouple school board support for electoral purposes from school support for assessment purposes.

Despite Elections Ontario taking responsibility for a single register of electors, under the *Assessment Act*, MPAC remains responsible for collecting information about school board support. This may be attributed to the leading legislative interpretation that school support may have dual purposes: electoral and assessment. However, as the Ombudsman noted in [the 2021-2022 Annual Report](#)⁴³, this data from MPAC is no longer used to determine school board funding but rather who can run and vote in school board elections.

Currently, the single register of electors is not expected to resolve this issue as MPAC remains responsible for collection of school support information. As a result, there are two separate portals through which voters must check and update their information: one from Elections Ontario for qualification and one from MPAC for school support. This dual process will cause confusion for the voter without resolving issues related to incorrect assignment of school support.

Municipalities receive school support information, relying on this data to develop their voters' lists. The problem resides in processes that assume an elector to be an English Public supporter unless a supporter has submitted forms or updated information on an online portal to declare otherwise. This particularly impacts French-language rights holders and separate school supporters who may have moved between wards or between municipalities but did not fill out a form.

This issue continues to blur the electoral picture for candidates, electors, and administrators when it comes to linking electors and the school boards for which they are entitled to cast their ballots. This blurring sometimes results in an elector being assigned an incorrect school board ballot which slows the voting process, frustrates the elector, and means more work for election officials. Making school support for electoral purposes distinctive in legislation and providing Elections Ontario with the authority to collect this information would improve the quality of school support data.

The Province should update candidate and voter guides to make it clear that school support amendments cannot be made by municipalities as a result of Provincial legislative barriers. It is important that candidates and voters are able to direct their concerns to the Province rather than to municipal staff who do not control these processes.

19. Amend the *Education Act* to clarify who is a French-language rights holder and who is a separate school rights holder.

As we noted previously, local elections are complex endeavours, and not only do clerks run municipal elections, but they are also required to run the election for trustees across five school boards. Increasingly, candidates who may not be qualified to run for school trustee (i.e. do not hold the language or religious rights to qualify) are submitting papers to run. This has resulted in

⁴³ Ontario Ombudsman. 2022, *Annual Report 2021-2022*, <https://www.ombudsman.on.ca/resources/reports,-cases-and-submissions/annual-reports/2021-2022-annual-report> p 43



void school board trustee elections. It is no wonder why there is confusion when the *Education Act*, *Assessment Act* and the *MEA* must be read to figure out the nuances of qualification. Clearer rules around language rights qualifications would help people understand whether they qualify as a candidate.

20. Clarify that school board trustee candidates must file their nomination papers in the municipality in which they reside.

Given that school board boundaries cross municipal boundaries, when trustee candidates do not submit their nomination papers in the municipality in which they reside, it complicates the situation. Clerks are left trying to figure out residential qualification in addition to general candidate qualification. This is burdensome for candidates and municipal staff and must be addressed.



21. Consider readjusting school board boundaries to align with municipal boundaries.

Given the complications between jurisdictional boundaries, one consideration may be to better align school board boundaries with municipal boundaries.

22. Conduct a review of identification requirements in the regulation and consider the availability of digital and hard copy identification as well as identification challenges for segments of Ontario voters.

Voters and administrators require more guidance and clarity on what types and forms of acceptable identification can be used in local elections. It is a persistent challenge for municipalities educating members of the public about what can be used, particularly because accepted identification is different than provincial and federal elections due to residency requirements. Moreover, certain voters also lack identification and documentation to be able to exercise their right to vote.

As part of the Province's work on [Digital Identity](#)⁴⁴ under the Ontario Onwards Action Plan, there should be collaboration and consultation with the municipal sector, including AMCTO, on the specific needs of identification for electoral and other local service provision purposes.

⁴⁴ See <https://www.ontario.ca/page/digital-id-ontario>



Trends AMCTO Continues to Monitor

Our Working Group also discussed several trends that may impact electoral administration. While there are no specific recommendations at this time, we want to highlight some of what the group identified to inspire continued conversations about the tools, resources and supports local election administrators may require in the future.

Electoral Participation

Declining voter turnout has been discussed as an indicator of democratic health. Our 2022 Post-Election Survey, which included data from [MMAH's municipal election survey](#), found a 4% decline in overall voter turnout between 2018 and 2022⁴⁵. In 2018 and 2022, electors also voted in a provincial election, and in the fall of 2021, voted in a federal election as well.

[Our 2014 Post-Election Survey](#) found the average turnout was approximately 43%⁴⁶. [As we noted in previous submissions](#), there may be some element of voter fatigue⁴⁷ which is also why we recommend shortening the election period.

While voter turnout has decreased, the number of acclamations has increased. [As AMO noted](#):

with fewer candidates, there are also more positions being acclaimed, especially in smaller, rural municipalities. This year, 548 council positions were acclaimed, including 139 mayors and reeves. Compared to 2018, total acclamations are up 15% over 2018 and up 16% for mayors and reeves (heads of council). A total of 32 councils will be entirely acclaimed this year, 3% more than 2018, when 26 councils were acclaimed. All of [sic] the fully acclaimed municipalities in 2022 have populations of 10,000 residents or less.⁴⁸

⁴⁵ AMCTO. February 2024, *2022 Post Election Survey*, <https://www.amcto.com/about-amcto/news-announcements/2022-municipal-elections-survey-key-findings>

⁴⁶ AMCTO. August 2015, *2014 Post Election Survey* <https://amctopolicy.files.wordpress.com/2015/08/amcto-2014-post-election-survey-results.pdf>

⁴⁷ AMCTO. July 2015, *AMCTO Submission on the Municipal Elections Act* <https://www.amcto.com/sites/default/files/2023-05/AMCTO-MEA-Submission.pdf>

⁴⁸ Association of Municipalities of Ontario (AMO). News Release. September 27 2022, "Municipal elections data available on AMO website" Accessed: <https://www.amo.on.ca/policy/municipal-governance-indigenous-relations/municipal-election-data-available-amo-website>

It is understood that in making voting easier and more accessible, it is possible to increase participation in local democratic processes which is why municipalities have looked at implementing alternative voting methods in their communities.

Digital Identity

As an Association, we continue to be interested in the Province's [Digital Identity](#) project⁴⁹ given the operational implications to local service delivery. Photo identification is used for recreation programming registration, paying property tax, resolving parking offenses, and confirming residency for local elections. The degree to which Ontario follows other jurisdictions in implementing digital identities will determine how local service delivery, including elections⁵⁰, may benefit or be challenged by such an initiative. Any introduction of digital identities will need to work for elections and be reflected in the *MEA*.



Misinformation

We are also keeping an eye on more subversive and potentially harmful trends including the spread of misinformation that threatens democratic institutions. This is an increasing concern for election administrators at all orders of government.

For instance, a report from the [Canadian Election Misinformation Project](#)⁵⁰ documents and evaluates misinformation during the 2021 Canada federal election. While there was widespread misinformation during this election, the overall impact was minimal as the campaign period and results were not driven by misinformation. However, there was a rise in misinformation through groups who hold conspiratorial beliefs about various topics. The report also highlights certain vulnerabilities that need to be addressed including the increasing difficulty in detecting what qualifies as misinformation and the continued distrust of democratic institutions by increasing segments of Canadians.

There has also been reporting on distrust and misinformation, among other threats outlined by the [Security and Intelligence Threats to Elections Task Force](#)⁵¹ that are a cause for concern.

While there are tools and resources offered by organizations like the [Canadian Centre for Cybersecurity](#)⁵² to help the public and others identify this pervasive information, decentralized elections such as those run by municipalities, could benefit from more specific resources and supports for managing these threats.

⁴⁹ See <https://www.ontario.ca/page/digital-id-ontario>

^{*} There are a range of identification requirements outlined in regulation that may be accepted as proof of identity.

⁵⁰ See https://www.mcgill.ca/maxbellschool/files/maxbellschool/meo_election_2021_report.pdf

⁵¹ See <https://www.cbc.ca/news/politics/threats-of-violence-canada-elections-1.7153960>

⁵² See <https://www.cyber.gc.ca/en/guidance/how-identify-misinformation-disinformation-and-malinformation-itsap00300>



Foreign Interference

Misinformation created and distributed by domestic actors is concerning enough but with the threat of foreign interference, the scale of risk is at a magnitude that must be dealt with at a national level. [The Government of Canada](#) consulted with Canadians on foreign interference and potential government action starting in late 2023⁵³. As an Association and to represent our members' interests, [we wrote to the Ministers of Justice Canada and Public Safety](#)⁵⁴ to advise that changes made at the federal level will require complementary provincial legislation. Local election administrators will require support in managing threats and potential incidents.

We also continue to watch with interest the [Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions](#)⁵⁵ for findings and recommendations.

Artificial Intelligence (AI)

While governments are beginning to take measures that provide frameworks and rules around the development and use of AI, there are few sources that deal specifically with elections. Administrators need the right legislative tools and guidance to ensure they can manage the impacts of AI on local democratic processes and ensure there is the right support to enforce such provisions. The Act must provide the rules and frameworks to support election administrators who may choose to leverage these technologies to improve electoral services.



⁵³ CSIS. 2021. *Foreign Interference: Threats to Canada's Democratic Process*. <https://www.canada.ca/content/dam/csis-scrs/documents/publications/2021/foreign-interference-threats-to-canada%27s-democratic-process.pdf>; Government of Canada. Public and Emergency Preparedness Canada. News Release. November 24, 2023. "Government of Canada launches consultation on legislative amendments to counter foreign interference in Canada" <https://www.newswire.ca/news-releases/government-of-canada-launches-consultation-on-legislative-amendments-to-counter-foreign-interference-in-canada-868566675.html>

⁵⁴ See AMCTO letter, January 2024 re: AMCTO Letter to Ministers of Justice Canada and Public Safety re Foreign Interference <https://www.amcto.com/letter-to-ministers-re-foreign-interference>

⁵⁵ See <https://foreigninterferencecommission.ca/>

Conclusion

For many reasons, election administrators at all orders of government face several heightened challenges and our clerk members are no different. [Increasing distrust in public institutions](#)⁵⁶ beyond just healthy skepticism⁵⁷ means that democratic processes delivered through election administration are more important than ever. There are decreasing rates of democratic participation reflected in low voter turnout, electoral support, and an increased number of acclamations that [impact the efficacy of elections](#)⁵⁸.

The good news is that there are opportunities as well: voting methods can reach more qualified electors which may result in increased rates of voter participation. Improvements to technology can result in more automated and quicker service delivery if balanced with the necessary security precautions. Clarifying rules can make compliance and enforcement more straightforward, paving the way for more diverse pools of candidates.

The Act should reflect the digital challenges and opportunities of today and tomorrow, and discussions should occur via legislated four-year reviews to ensure clarity, consistency, accountability, transparency, and trust remain top of mind. The legislation should be more enabling while providing important guidance, standards, and support with the right mix of tools to make compliance and enforcement streamlined.

The Province should build on the [MEA modernization work from 2016](#)⁵⁹ by rewriting and restructuring the Act to address existing and new challenges and opportunities. The issues weighing most on the minds of election administrators would be served by transformational change to the Act to provide a better overall framework for local elections. This requires bringing a 21st century mindset to improving service delivery to voters, candidates, and the public, while providing election administrators with more flexibility, certainty, and clarity to do the important work of delivering fair, accountable, and transparent municipal and school board elections.

AMCTO looks forward to discussing our recommendations with the Province and collaborating on priority legislative and regulatory improvements.

⁵⁶ Edelman Canada. May 2023. “2023 Edelman Trust Barometer,” <https://www.edelman.ca/sites/g/files/aatuss376/files/202303/2023%20Edelman%20Trust%20Barometer%20EN.pdf>

⁵⁷ Norris, Pippa. *In Praise of Skepticism: Trust but Verify*. Oxford University Press, 2022.

⁵⁸ See <https://www.amo.on.ca/policy/municipal-governance-indigenous-relations/analysis-2022-municipal-post-election-data>

⁵⁹ See <https://www.ola.org/en/legislative-business/bills/parliament-41/session-1/bill-181/debates>



AMCTO MEA Working Group

AMCTO formed the MEA Working Group in 2023 to review, analyze, and discuss a suite of reforms to the *Municipal Elections Act (MEA)*. Together, the Group brought forward best practices and lessons learned from municipal and school board elections administration to identify challenges and opportunities for solution-orientated improvements to existing election rules and regulations. Their work informed this submission and continues to support our members and municipal professionals in local election administration.

AMCTO would like to thank the following individuals for their time, contributions, and expertise as part of our MEA Working Group:

Martina Chait-Hartwig
(Chair)
Township of Douro-Dummer

Florence Witherspoon
(Vice-Chair)
Township of Ashfield-
Colborne-Wawanosh

Shawnica Hans
City of Brampton

Veronique Hie
City of North Bay

Terri Knight-Lepain
City of Windsor

Antonia Mancuso
Town of Oakville

Lori McDonald
Town of Bracebridge

Fiona Murray
City of Toronto

Evan Read
City of Vaughan

Pam Walsh
Town of Blind River

For more information about this Working Group, the submission and AMCTO advocacy initiatives, please contact advocacy@amcto.com.

The following appendix includes a line-by-line breakdown of our recommendations and the corresponding section of the *MEA* in its current form. We invite the Province to consult with us, our members and other sector organizations on reviewing and updating the current legislation to better serve local elections administration now and into the future.



Appendix: Summary of Recommendations

Recommendation	Legislative Reference(s) if applicable	Rationale
Overhaul and update the <i>Act</i> to ensure that it is future-proof, addresses current gaps, streamlines rules, and brings added clarity well ahead of the 2030 election.	Act and regulations	The <i>MEA</i> contains a patchwork of amendments, sections, provisions and other structural issues that make it difficult for people to understand and manage.
Include a legislative requirement to review the <i>Act</i> after every scheduled municipal and school board election year.	New section	The <i>Act</i> should be updated on a regular cycle to ensure that it is responsive to new and emerging technology and trends.
Review how the current legislation, regulations, and prescribed forms treat personal information, considering a digital privacy lens.	Act and regulations	Protection of privacy is becoming an increasing concern and is central to ensuring public trust.
Amend the <i>Act</i> to include a preamble that captures the principles of elections recognized by the court and the intended outcomes of the <i>Act</i> .	New preamble	A preamble inclusive of these principles should set out the intended outcomes of the legislation and provide foundational understanding of elections.
Establish a mechanism that permits the Minister of Municipal Affairs, in consultation with affected communities, to alter municipal and school board election day if it falls on a day of cultural or religious significance.	Section 4 Regular elections	In future years, it could be the case that election day falls on another culturally or religiously significant festival or event impacting voter turnout and staffing resources.
Require school boards to schedule one of the provincially required Professional Activity (PA) days on municipal and school board election day.	New sub/section	Confirming availability of school facilities for election day is one less thing for clerks to have to determine and provides voters with a large, central, accessible facility to cast their ballots. Ensures that election administrators can focus on providing electoral services to residents and municipal and school trustee candidates.
Amend the <i>Act</i> so that, if requested, schools and institutions must allow space for advance polls and voting day free of charge.	Section 45 Number and location of voting places	Clerks require a legislative basis to work with heads of institutions to address resident voting requirements providing more opportunities for the most vulnerable to cast their vote.

Recommendation	Legislative Reference(s) if applicable	Rationale
Remove the requirement for employees of a municipality or local board to provide notice of their intention to stand for election to council.	Section 30 Employee of a municipality	Potential candidates for municipal office, who happen to work for a municipality or a local board, should be provided the same, equal opportunity as other candidates who are not required to declare their intentions until they submit their paperwork.
Clarify the Act to reflect that a voter's absence from work may be on any day voting is available (i.e. advance voting days).	Section 50 Electors' absence from work	The current definition of voting day is limited to Election Day only and could be interpreted to not include advance voting days.
In consultation with AMCTO and other municipal stakeholders, consider how the work by the Digital Governance Standards Institute related to electronic voting may be formalized to support election administration in Ontario.	New section	With an increasing number of municipalities considering e-voting methods to make voting easier and be "where the voters are" there should be a provincial interest in adopting some standards.
Establish a working group with AMCTO and other municipal stakeholders to inform the development of a regulation for electoral definitions of "tenant", "spouse of a non-resident" and "occupancy".	Section 17 Qualification of electors (with possible implications for Section 2 Residence)	The current definitions provided in the Act are not sufficiently clear, and create potential confusion for electors, candidates, and administrators.
Remove the 25-signature endorsement requirement.	Section 33 Filing Nomination	Signature requirements in medium and large cities has not addressed its stated intent as signatures are easy to collect with a declaration that signees are eligible electors and adds an administrative burden.
Investigate incentives to support genuine candidacy while addressing frivolous campaigns, including the nomination filing fee refund.	Section 34 Refund	The current process of refunding anyone who files a financial statement does not dissuade frivolous candidacies. Other mechanisms should be investigated.
Amend the Act so that no candidate shall accept a contribution over \$1,200 from a single resident.	Section 88.9 Maximum contributions to candidates	Fill the gap that does not specifically prohibit candidates from accepting a contribution.
Clarify that any resident of Ontario may submit a compliance audit application, consistent with contribution rules.	Section 88.33 Compliance audit of candidate finances	Clarify that any resident in Ontario can file a compliance audit application consistent with rules on contributions.

Recommendation	Legislative Reference(s) if applicable	Rationale
Consider setting one 90-day period for compliance audit applications for initial and supplementary financial statements to simplify the process.	Section 88.33(3)	The current structure creates many overlapping deadlines that is challenging to communicate to electors and candidates and for purposes of tracking.
Roll the review of contributions and over-contributions to candidates and third-party advertisers into the Compliance Audit Committee (CAC) process and permit the committee to decide whether to commence a legal proceeding against a candidate or third-party advertiser for an apparent contravention.	Section 88.34 Review of contributions to candidates	This provision jeopardizes the independence and impartiality of the clerk, places the clerk in conflict with members of council and there already exists a process on the Compliance Audit Committee to review statements.
Expand decision timelines for CACs in Subsection (8) from 30 days to 45 days.	Section 88.34 Review of contributions to candidates	To support applicants, election administrators and CAC members with carrying out an application, moving the decision-timelines from 30 days to 45 days may be more reasonable especially where the CAC process may fall around the holidays and is consistent with references in other statutes for required meetings.
Clarify roles with respect to CACs wherein council is responsible for establishing the committee and the clerk is responsible for making appointments.	Section 88.37 Compliance Audit Committees	The MEA gives the responsibility for administering elections, including establishing necessary policies and procedures, to the clerk. However, there are several sections throughout the Act where the responsibility for what are, in effect, administrative decisions is unclearly distributed between both Council and staff. This is one area where there is a clear conflict in members of council who may be subject to an application are involved in the administration of the committee reviewing that application.
Clarify the role of scrutineers where alternative (unsupervised or remote) voting is in place and collaborate with AMCTO and others on the definition of scrutineer and what they may or may not do.	Section 16 Scrutineers	Qualifications of scrutineers continues to be challenged. Moreover, as alternative voting methods are increasingly used, the role of scrutineering is less understood and should be addressed.
Review the scope of election offences and related penalties to address gaps. Consider providing support and guidance to clerks on best practices for implementation and enforcement of serious offences.	Section 89 Offences	Fill existing and new gaps because of changes to technology. Any changes to offences and penalties would require additional guidance and support for election administrators on how to enforce these matters.

Recommendation	Legislative Reference(s) if applicable	Rationale
Establish a working group with AMCTO and other municipal partners to review and improve the campaign finance framework, including rules, guidance, forms, processes, and penalties.	Section 88.8 Campaign Contributions to Section 94.2 Limitation Period	The campaign finance framework is complex to administer and comply with and should be reviewed to make it easier to follow while ensuring accountability.
Establish a working group with AMCTO and other municipal stakeholders to review and improve the third-party advertiser regime for ease of compliance and enforcement.	Section 88.4 Third Party Advertisers	The third-party advertising framework is complex to administer and comply with and should be reviewed to make it easier to follow and comply with.
Within the campaign finance and third-party advertiser frameworks, review the mechanisms for enforcement, and related penalties to address gaps in accountability and transparency measures.	Section 89- Section 94.2	A holistic review needs to consider enforcement mechanisms, penalties and the prosecution process for candidates and contributors.
Consider increasing maximum campaign spending limits and its related formula to consider inflation outlined in O Reg 101/97.	O Reg 101/97	The Province should consider reviewing and updating the spending limit formula in regulation which has been stagnant and does not consider inflationary pressures on campaign costs.
Explore establishing an independent office to manage investigation and prosecution of offences under the Act.	New section	Municipalities have faced challenges proceeding with investigations and prosecutions due to capacity, resourcing and time-consuming processes through the courts. A separate body would allow for alternate dispute resolution that avoids placing municipal staff in conflict with candidates and members of council.
Bring the language of the Act and regulations into the 21 st century by removing gendered references and including references to encompass all voting methods.	Act and regulations	To ensure more inclusive language within the Act, remove gendered references. Moreover, as more municipalities are turning to voting methods to reach voters and run efficiency elections, language in the Act across numerous sections and within regulations should contain language that encompasses all voting methods rather than referring to paper ballots.
Ensure all definitions that appear in the Act are captured in and limited to Section 1 and update definitions to add clarity.	Section 1	One way to improve clarity and improve interpretation in the Act is to ensure that key terms within the Act are captured in the definition section. There are several areas wherein a definition appears later in the Act and others are captured in the definition section.

Recommendation	Legislative Reference(s) if applicable	Rationale
Clarify references to municipal business hours as well as dates that constitute a weekend or holiday as defined pursuant to the <i>Legislation Act, 2006</i> .	Section 10 Saturdays and Holidays and other sections dealing with filing deadlines.	Inconsistency between business hours and the legislation can lead to frustration for candidates, administrators and others engaging in local democratic processes.
Move nomination day to July, shortening the campaign period to be more consistent with federal and provincial campaign periods.	Section 31 Nomination Day	The municipal nomination period is longer than those at the provincial and federal levels which are run by agencies whose sole focus is election administration while municipal staff are managing day-to-day operations while running elections simultaneously. Revert back to the 2016 nomination deadline of July or earlier.
Enable clerks to determine what voting method is best as the local chief electoral officer and align timelines related to clerk's procedures.	Section 42 Bylaws re voting and vote counting equipment	Clarify areas of responsibility between the clerk as the administrator of elections and council as overseers of the municipality.
Change the timeline for proxy appointment to begin September 1 st for a regular election.	Section 44 Appointment of Proxy	Fix the disconnect between voters' list availability and appointment of proxies, qualifications for which cannot be confirmed as electors until the list is available.
Expand the timeline for reporting on accessible elections from 90 days to 120 days.	Section 12.1 (3)	Extending the timeline would allow more time to compile a comprehensive post-election report which is typical practice.
Consider aligning the spending limit certificate requirements and timelines between candidates and third-party advertisers for consistency.	Section 88.20 Candidate Expenses and s 88.1 Registered Third parties' expenses	Providing consistent timelines across various participants in the electoral process makes it easier for municipal staff to adhere to legislative requirements and ensure that candidates and parties are adhering to timelines.
Update existing provincial guides and forms and provide additional guidance to voters, candidates, third-party advertisers, and election administrators.	Voters' Guide; Third Party Advertisers Guide; Candidate's Guide	There are several opportunities to update and provide more information to support voters, third party advertisers and candidates in Provincial guidance materials. There have also been several challenges with usability of provincial forms and inconsistencies between the legislation and forms that should be addressed.
Extend the timeline to submit final changes to the voters' list from 30 days to 60 days.	Section 27 List of changes	Provide more time for clerks to provide final changes after the election period given the number of activities and tasks required to be completed post-election.

Recommendation	Legislative Reference(s) if applicable	Rationale
Consider extending discretion to remove a name from the voters' list and the correction of errors to voting day.	Section 22 Correction of Errors	Electors who move must fill out forms or go to a portal to update their residency and school support information, and despite improvements made to make this process easier, there will be electors who do not do this. Permitting clerks to remove names to voting day would allow for a cleaner voters' list.
Establish a province-wide registry for <i>MEA</i> offenders, maintained by the MMAH or another provincial body, and provide this registry to election administrators.	Section 35 Examination of nominations	While candidates are ultimately responsible for declaring their eligibility, clerks are required to certify nominations. Providing centrally available information about qualifications of candidates, and of those who may have contravened the <i>MEA</i> available to clerks will support this process.
Amend the <i>Act</i> to consolidate rules between regular elections and by-elections specifying what must be different.	Section 65 By-elections	Should the <i>Act</i> continue to distinguish between regular and by-elections, then there must be more guidance and information on how these elections are run to ensure more consistency in how by-elections are run across the province.
Consider a threshold amount for registering as a third-party advertiser that is in line with provincial and federal thresholds.	Section 88.4 Third Party Advertisers	The process is cumbersome and may prevent smaller actors from engaging in the political process for fear of being labelled as a third-party advertiser.
Consider amending the deadline for third-party advertiser registration to be more reasonably in advance of an election.	Section 88.4 Third Party Advertisers	There are also timeline issues with registration. Allowing third-parties to register up to election day is problematic from an operations perspective when municipal staff's attention has shifted from paperwork to execution of voting.
Clarify the process for removing a name from the voters' list by a relative.	Section 24 Application for Name Change	Electors who move must fill out forms or go to a portal to update their residency and school support information, and despite improvements made to make this process easier, there will be electors who do not do this. Permitting clerks to remove names to voting day would allow for a cleaner voters' list.
Decouple school board support for electoral purposes from school support for assessment purposes.	<i>Education Act, 1990</i> and <i>Assessment Act, 1990</i>	Cumbersome rules across multiple acts can result in an elector being assigned an incorrect school board ballot which slows the voting process, frustrates the elector, and means more work for election officials.
Amend the <i>Education Act</i> to clarify who is a French-language rights holder and who is a separate school rights holder.	<i>Education Act, 1990</i> and <i>Assessment Act, 1990</i>	Clearer language around qualifications would help people understand whether or not they qualify as a candidate.

Recommendation	Legislative Reference(s) if applicable	Rationale
Clarify that school board trustee candidates must file their nomination papers in the municipality in which they reside.	<i>Education Act, 1990</i> and <i>Municipal Elections Act</i>	School board boundaries cross municipal boundaries, and trustee candidates do not always submit their nomination papers within the municipality in which they reside, meaning clerks are left trying to figure out residential qualification as well. The complexity is burdensome for candidates and for municipal staff and must be addressed. Rules for elections need to be clear and straightforward.
Consider readjusting school board boundaries to align with municipal boundaries.	<i>Education Act, 1990</i> and <i>Municipal Act</i>	Given the complications between jurisdictional boundaries, one consideration may be to better align school board boundaries with municipal boundaries.
Conduct a review of identification requirements in the regulation and consider the availability of digital and hard copy identification as well as identification challenges for segments of Ontario voters.	O Reg. 304/13 Voter Identification	There are numerous ways people carry identification requirements and there are segments of the population without proper identification. The Province has also been working on digital identity which needs to be accounted for.



The Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO) represents excellence in local government, management and leadership. Over the past 85 years, AMCTO has provided education, accreditation, leadership, and management expertise for Ontario municipal professionals. With 2,200+ members working in municipalities across the province, AMCTO is Ontario's largest association of local government professionals, and the leading professional development organization for municipal professionals.

Our mission is to deliver professional growth, networks, advocacy, and leadership to support and strengthen the knowledge, skills, and capabilities of municipal professionals now and into the future.

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From: [Kitzelmann, Mark](#)
To: [Kitzelmann, Mark](#)
Subject: York Region - September 30, 2024 (Q3) - Total Population and Household Estimate
Date: October 17, 2024 11:18:16 AM
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[09_2024.xls](#)

CAUTION: This email originated outside of the Town of Newmarket. **DO NOT** click links or open attachments unless you recognize the sender and trusted content.

Hello everyone,

Attached, you'll find the September 30, 2024 (Q3) Population and Household Estimates for York Region and the nine local area municipalities.

So far in 2024, York Region has grown by approximately 8,770 people in 4,824 newly built and occupied homes, reaching a total estimated population of **1,266,931**.

The annual occupied housing completion mix for York Region up to September 2024 is depicted below:

YTD 2024 Newly Built and Occupied Households		
Unit Type	# Units	% Share
Singles	1,257	26%
Semis	98	2%
Rows	1,381	29%
Apartments	2,088	43%
Total	4,824	100%

Please let me know if you have any questions or need anything else.

Best regards,
Mark

*Our working hours may be different. Please do not feel obligated to reply outside of your scheduled working hours.
Let's work together to help foster healthy work-life boundaries.*

Mark KitzeImann MCIP, RPP | Planner, Economic and Development Services, Corporate Services

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Our Misson: **Working together to serve our thriving communities – today and tomorrow**



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YORK REGION POPULATION ESTIMATE

September 30, 2024

Municipality	Population July 1, 2016	Population Dec 31, 2023	Estimated Number of Occupied Households September 30, 2024						Estimated Population Sept. 30, 2024
			Singles	Semis	Rows	Duplexes	Apts	Total	
Aurora	57,182	64,523	13,406	1,536	3,628	620	2,946	22,136	65,848
East Gwillimbury	24,737	39,321	10,518	575	1,303	320	280	12,997	41,021
Georgina	46,631	50,519	15,722	534	839	575	1,121	18,792	51,904
King	25,451	28,158	7,980	160	389	100	540	9,169	28,800
Markham	338,839	362,445	63,011	7,330	17,767	5,875	22,561	116,544	363,576
Newmarket	86,860	91,670	18,433	2,321	4,209	1,975	4,507	31,445	93,322
Richmond Hill	200,941	217,060	40,147	2,786	11,704	1,945	16,122	72,704	217,465
Vaughan	316,000	350,723	66,282	8,097	11,931	3,345	21,066	110,721	348,412
Whitchurch-Stouffville	47,259	53,743	13,200	820	2,444	405	1,780	18,649	56,582
York Region	1,143,900	1,258,161	248,701	24,159	54,214	15,160	70,921	413,155	1,266,931

Source: York Region, Corporate Services, Planning Policy and Data Branch, based on Statistics Canada data and CMHC Housing Completions.

Notes: Population figures include an adjustment for the Census undercount.

The population estimates are calculated by the following method:

- a) CMHC housing completion data is added to the 2021 occupied households, and minor adjustments are made to the total occupied households for demolitions and vacancies.
- b) A declining person per unit factor by household type is applied to the occupied household estimates to derive a population estimate.
- c) An estimate of the population in institutions is then added to the preliminary population estimate.
- d) An undercount adjustment is then applied to generate a final population estimate.
- e) The population estimates do not include an analysis of migration and natural increase data.

October 21, 2024

The Right Honourable Justin Trudeau
 Prime Minister of Canada
 House of Commons
 Ottawa, ON Toronto, ON M7A 1A1

Delivered by email
Justin.Trudeau@parl.gc.ca

Dear Mr. Prime Minister:

Re: Town of Whitchurch-Stouffville Council Resolution of September 11, 2024, Re: Ten Dollar a Day Daycare

Please be advised that this matter was considered by Council at its meeting held on September 11, 2024, and Council passed the following resolution:

Moved by: Councillor Upton

Seconded by: Councillor Smith

WHEREAS on March 22, 2022, the Federal and Provincial Governments announced a funding agreement that will reduce the cost of childcare in Ontario to an average of \$10 per day by March 2026; and

WHEREAS the For-Profit / Not-For-Profit quotas [30/70] mandated by the Federal Government artificially limits the number of licences that can be given out and therefore limits the childcare spaces that can be created; and

WHEREAS every childcare centre in Whitchurch-Stouffville has a waitlist; and

WHEREAS families are being forced to waitlist for \$10 per day childcare even though there is unspent budget for unrealized Not-For-Profit centres due to a lack of Not-For-Profits applying; and

WHEREAS changing the ratios could unlock thousands of new \$10 per day childcare spaces immediately;

NOW THEREFORE BE IT RESOLVED THAT the Town of Whitchurch-Stouffville requests the Federal and Provincial Governments adjust the For-Profit / Not-For-Profit quotas in the agreement; and

THAT this resolution be circulated and brought to the attention of the Right Hon. Justin Trudeau, Prime Minister of Canada; Hon. Helena Jaczek, Member of Parliament, Markham-Stouffville; Hon. Doug Ford, Premier of Ontario; Hon. Jenna Sudds, Minister of Families, Children and Social Development; Hon. Jill Dunlop, Minister of Education; and to all York Region Municipalities.

Carried

The above is for your consideration and any attention deemed necessary.

Kind regards,

Monica Beattie

Monica Beattie
Council/Committee Coordinator

Copy: Hon. Doug Ford, Premier of Ontario
Hon. Helena Jaczek, MP Markham-Stouffville
Hon. Jenna Sudds, Minister of Families, Children and Social Development
Hon. Jill Dunlop, Minister of Education
All York Region Municipalities

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.2.
Resolution Number 2024-363
Title: Resolution Stemming from July 17, 2024 Regular Meeting of Council - Item 7.0 -
Correspondence #5
Date: October 16, 2024

Moved by: Councillor Laframboise
Seconded by: Councillor Pothier

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Resolution No. 2024-125 passed by the Corporation of the Town of Cobalt, regarding a PS3280 accounting standard covering asset retirement obligations;
AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Minister of Municipal Affairs and Housing, Paul Calandra; the Association of Municipalities of Ontario (AMO); the Federation of Ontario Municipalities (FONOM); and all Ontario Municipalities.

CARRIED


MAYOR



THE CORPORATION OF THE TOWN OF COBALT

June 26, 2024

The Corporation of the Township of Harley
903303 Hanbury Rd
New Liskeard, ON P0J 1P0

Please be advised that at the Regular Meeting of Council on June 25, 2024, the Town of Cobalt adopted the following resolution:

RESOLUTION No. 2024-125

MOVED BY: Councillor Wilcox
SECONDED BY: Councillor Starchuk

WHEREAS the Public Sector Accounting Board (PSAB) establishes accounting standards for the public sector which must be followed by all Ontario municipalities;

AND WHEREAS the Municipal Act, 2001, section 294.1 states that a municipality shall, for each fiscal year, prepare annual financial statements for the municipality in accordance with generally accepted accounting principles for local governments as recommended, from time to time, by the Public Sector Accounting Board of the Chartered Professional Accountants of Canada;

AND WHEREAS PS3280 is a new accounting standard covering asset retirement obligations (ARO) that was approved by PSAB in March 2018;

AND WHEREAS the standard must be applied by all public sector entities who prepare their financial statements under PSAB, including all Canadian municipalities;

AND WHEREAS many small municipalities do not have accountants or engineers on staff to complete the ARO obligations and this major accounting changes will force small municipalities to hire consultants to complete this work and cause a significant financial burden to municipalities;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Town of Cobalt supports the resolutions from the Township of Harley, Coleman Township, Township of Larder Lake, Township of Casey, Township of Hudson & Township of Kerns and hereby calls upon the province of Ontario to provide financial assistance to municipalities to complete the ARO;

AND FURTHER THAT a copy of this resolution be forwarded to the Honourable Paul Calandra, Minister of Municipal Affairs and Housing, the Association of Municipal Clerks and Treasurers of Ontario (AMCTO), the Timiskaming Municipal Association (TMA), the Federation of Northern Ontario Municipalities (FONOM) and all municipalities within the District of Timiskaming.

CARRIED

Kind Regards,

A handwritten signature in blue ink, appearing to read "S. Dalley".

Steven Dalley
Town Manager, Clerk/Treasurer
Email: sdalley@cobalt.ca

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.3.
Resolution Number 2024-364
Title: Resolution Stemming from July 17, 2024 Regular Meeting of Council - Item 7.1 - Correspondence #6
Date: October 16, 2024

Moved by: Councillor Pothier
Seconded by: Councillor Laframboise

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports the Resolution dated June 27, 2024 passed by the Town of Petrolia supporting the Resolution dated May 13, 2024 passed by the City of Belleville, regarding family doctors;
AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Premier Doug Ford; Minister of Health, Sylvia Jones; the Association of Municipalities of Ontario (AMO); our local Member of Provincial Parliament (MPP); and all Ontario Municipalities.

CARRIED


MAYOR

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.4.
Resolution Number 2024-365
Title: Resolution Stemming from July 17, 2024 Regular Meeting of Council - Item 7.1 - Correspondence #7
Date: October 16, 2024

Moved by: Councillor Laframboise
Seconded by: Councillor Pothier

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports the Resolution dated June 24, 2024 passed by the City of St. Catharines, regarding the Green Roads Pilot Project;
AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Association of Municipalities of Ontario (AMO); and all Ontario Municipalities.

CARRIED


MAYOR



June 27, 2024

Association of Municipalities of Ontario
155 University Ave | Suite 800
Toronto, ON M5H 3B7

Sent via email: resolutions@amo.on.ca

**Re: Green Roads Pilot Project
Our File 35.72.3**

To Whom it May Concern,

At its meeting held on June 24, 2024, St. Catharines City Council approved the following motion:

WHEREAS St. Catharines has declared a climate emergency, recognizing the urgent need to address and mitigate the impacts of climate change on our community and environment; and

WHEREAS alternatives to traditional road surfacing materials exist, including green roads technologies that are more sustainable and environmentally friendly; and

WHEREAS bioresin is a natural alternative that can be used to support road surfacing, providing a more sustainable option that reduces our reliance on petrochemical-based products; and

WHEREAS many secondary roads in St. Catharines require resurfacing, presenting an opportunity to explore and implement innovative and sustainable road surfacing solutions; and

WHEREAS Good Roads, the Association of Municipalities of Ontario (AMO), and the Federation of Canadian Municipalities (FCM) have presented alternatives for municipal road restoration that include sustainable and environmentally friendly materials and methods; and

WHEREAS other municipalities, such as Centre Wellington, have entered into a similar pilot project using bioresin and other sustainable materials, demonstrating a commitment to innovation and environmental stewardship; and

WHEREAS implementing pilot projects using bioresin on city roads can provide valuable data and insights into the feasibility, performance, and environmental benefits of this alternative material; and



WHEREAS the Federation of Canadian Municipalities (FCM) has established the Green Municipal Fund which includes new funding for pilot projects to test innovative and ambitious technologies to improve environmental outcomes;

THEREFORE BE IT RESOLVED that St. Catharines City Council directs staff to investigate the feasibility and potential benefits of using bioresin on City road works; and

BE IT FURTHER RESOLVED that staff investigate other alternative construction materials and methods for road works that minimizes the City's carbon footprint and are more environmentally sustainable; and

BE IT FURTHER RESOLVED that staff prepare a report on the findings, no later than Q3 2024, including potential costs, benefits, and environmental impacts of using bioresin or other sustainable construction materials or methods for road works, and if feasible, a list of City streets where a pilot project may be considered in accordance with the City's procurement policy; and

BE IT FURTHER RESOLVED that this resolution be sent to all Ontario municipalities, the Association of Municipalities of Ontario (AMO), and the FCM to encourage the exploration and adoption of sustainable road surfacing alternatives.

If you have any questions, please contact the Office of the City Clerk at extension 1524.

A handwritten signature in blue ink that reads "D Delvecchio".

Donna Delvecchio, Acting City Clerk
Legal and Clerks Services, Office of the City Clerk
:sm

cc: all Ontario Municipalities

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.5.
Resolution Number 2024-366
Title: Resolution Stemming from July 17, 2024 Regular Meeting of Council - Item 7.1 -
Correspondence #22
Date: October 16, 2024

Moved by: Councillor Pothier
Seconded by: Councillor Laframboise

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Resolution 207-2024 passed by the Township of Terrace Bay, regarding sustainable funding for OPP in small rural municipalities;

AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Premier Doug Ford; the Solicitor General of Ontario, Michael Kerzner; the Minister of Finance, Peter Bethlenfalvy; the Association of Municipalities of Ontario (AMO); our local Member of Provincial Parliament (MPP); and all Ontario Municipalities.

CARRIED


MAYOR



The Corporation of the Township of Terrace Bay

P.O. Box 40, 1 Selkirk Avenue, Terrace Bay, ON, P0T 2W0
Phone: (807) 825-3315 Fax: (807) 825-9576

July 10, 2024

Municipality of Tweed
255 Metcalf St
Tweed, Ontario
K0K 3J0

At the Township of Terrace Bay Regular Council Meeting held on Tuesday July 2, 2024, the following resolution was passed.

Re: Sustainable Funding for OPP small rural municipalities

Resolution: 207-2024

Moved by: Councillor Gary Adduono

Seconded by: Councillor Rick St. Louis

WHEREAS it is apparent that the Ontario Government has overlooked the needs of small rural Ontario; AND

WHEREAS Ontario's small rural municipalities face insurmountable challenges to fund both upfront investments and ongoing maintenance of their capital assets including roads, bridges, water/wastewater and municipally owned buildings including recreational facilities, libraries and other tangible capital assets:

AND WHEREAS small rural Ontario's operating needs consume the majority of property tax revenue sources; AND WHEREAS small rural municipalities (of 10,000 people or less) are facing monumental infrastructure deficits that cannot be adequately addressed through property tax revenue alone; *AND

WHEREAS in 2015 the provincial government moved to standardized billing for all non-contract D.P.P. (5.1) locations; AND WHEREAS the Ontario Government has committed \$9.1 billion to Toronto alone to assist with operating deficits and the repatriation of the Don Valley and Gardner Expressway; and \$534 million to Ottawa for the repatriation of Hwy 174; AND WHEREAS the annual cost of the Ontario Provincial Police, Municipal Policing Bureau for small rural non-contract (5.1) municipalities is approximately \$428 million;

AND WHEREAS this annual cost is significantly less than the repatriation costs of the Gardiner Express Way, the Don Valley Parkway and Highway 174 (Ottawa Region) but provides a greater impact to the residents of the Province overall; AND WHEREAS this will afford relief to small rural municipalities for both infrastructure and operating needs while having a minimal impact on the provincial budget; NOW

THEREFORE BE IT RESOLVED THAT The Municipality of Tweed call on the Ontario Government to immediately implement sustainable funding for small rural municipalities by reabsorbing the cost of the Ontario Provincial Police Force back into the provincial budget with no cost recovery to municipalities:



The Corporation of the Township of Terrace Bay

P.O. Box 40, 1 Selkirk Avenue, Terrace Bay, ON, P0T 2W0

Phone: (807) 825-3315 Fax: (807) 825-9576

AND FURTHER, that Council direct staff to circulate this resolution to Premier Doug Ford (premier@ontario.ca), Minister of Solicitor General, Minister of Finance, MPP for Thunder bay-Superior North, Lise Vaugeois and to the Association of Municipalities of Ontario (amo@amo.on.ca) and at Municipalities of Ontario.

Sincerely,

J. Hall
Chief Administration Officer/Clerk

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



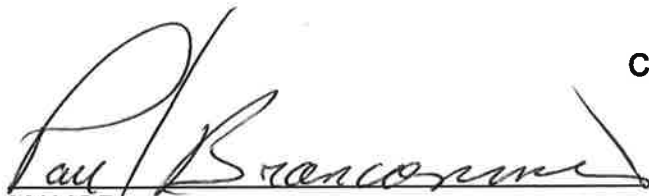
Regular Meeting of Council

Agenda Number: 8.6.
Resolution Number 2024-367
Title: Resolution Stemming from August 14, 2024 Regular Meeting of Council - Item 7.1
- Correspondence #10
Date: October 16, 2024

Moved by: Councillor Pothier
Seconded by: Councillor Laframboise

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Resolution #RC24168 passed by the Municipality of Wawa, regarding Immediate Action Needed to Support Ontario's Forest Sector;
AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Premier Doug Ford; the Minister of Natural Resources and Forestry, Graydon Smith; the Minister of Northern Development, Greg Rickford; the Association of Municipalities of Ontario (AMO); our local Member of Provincial Parliament (MPP); and all Ontario Municipalities.

CARRIED


MAYOR



The Corporation of the Municipality of Wawa

REGULAR COUNCIL MEETING

RESOLUTION

Tuesday, July 23, 2024

Resolution # RC24168	Meeting Order: 11
Moved by: <i>M Hatfield</i>	Seconded by: <i>Cathy Cannon</i>

WHEREAS Council of the Municipality of Wawa received correspondence from the Ontario Forest Industries Association dated June 19, 2024 regarding Immediate Action Needed to Support Ontario's Forest Sector;

NOWHEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Municipality of Wawa does hereby receive and support the correspondence dated June 19, 2024 from the Ontario Forest Industries Association and urges the Ontario government support all measures targeting the immediate challenges the Ontario Forest sector faces.

RESOLUTION RESULT	RECORDED VOTE	YES	NO
<input checked="" type="checkbox"/> CARRIED	MAYOR AND COUNCIL		
<input type="checkbox"/> DEFEATED	Mitch Hatfield		
<input type="checkbox"/> TABLED	Cathy Cannon		
<input type="checkbox"/> RECORDED VOTE (SEE RIGHT)	Melanie Pilon		
<input type="checkbox"/> PECUNIARY INTEREST DECLARED	Jim Hoffmann		
<input type="checkbox"/> WITHDRAWN	Joseph Opato		

Disclosure of Pecuniary Interest and the general nature thereof.

- Disclosed the pecuniary interest and general name thereof and abstained from the discussion, vote and influence.

Clerk: _____

MAYOR – MELANIE PILON	CLERK – MAURY O'NEILL
<i>M. Pilon</i>	<i>Maury O'Neill</i>



June 19, 2024

The Hon. Graydon Smith
Minister of Natural Resources
Whitney Block
99 Wellesley Street West
Toronto, Ontario
M7A 1W3

The Hon. Nolan Quinn
Associate Minister of Forestry
Whitney Block
99 Wellesley Street West
Toronto, Ontario
M7A 1W3

Submitted via email.

Re: Immediate Action Needed To Support Ontario's Forest Sector

Minister Graydon Smith and Associate Minister Nolan Quinn,

Congratulations on your recent appointments within Premier Doug Ford's Cabinet. The Ontario Forest Industries Association (OFIA) looks forward to our productive and continued work together.

Over the last six months, three of Ontario's six pulp and paper mills have permanently closed or idled. Adding to the issue was the closure of a critical softwood pulp market in Quebec. As you know, these facilities served as important consumers of solid-wood byproducts from Ontario sawmills.

The OFIA appreciates the many opportunities we have had to speak with you and senior leadership within Ontario's Ministry of Natural Resources (MNR) and Premier's Office. This includes in-person meetings with members of OFIA's Board Executive Committee on January 19th, March 19th, and May 28th, 2024. During these meetings, the OFIA presented short and long-term actions Ontario could take to address the regional chip and pulpwood market crisis endorsed by the OFIA membership (incl.).

The industry eagerly anticipates government action on this matter, as operating conditions for many have continued to worsen over the past six months. Combined with weak markets for some finished products, many companies struggle to continue their operations. We are now facing an unprecedented challenge in the sector, which could have negative and long-lasting implications for northern and rural communities across Ontario.

Without immediate action in response to OFIA recommendations and, critically, the vetting of potential solutions through the industry to ensure programs truly meet the sector's needs, we fear Ontario could face further curtailments, job losses, and lost economic opportunity.

The OFIA is ready to work with the Ontario government to set the forest products sector on a long-term and stable path towards economic development and prosperity. This includes our

vision of a *Forest Energy Directive* to develop bioheat, district heating, liquid fuels, renewable gases, biocarbon, and electricity generation projects, supporting Ontario's massive forecasted growth in non-emitting energy demands.

We urge you and your colleagues to continue supporting all measures targeting the immediate challenges the Ontario forest sector faces and look forward to future discussions with you.

Sincerely,



Ian Dunn, R.P.F.
 President & CEO
 Ontario Forest Industries Association
 Cell: 647-297-3827

Incl. March 19th, 2024 Slide Deck – Summary of Input from the Membership – OFIA Meeting with the Hon. Graydon Smith

May 28th, 2024 Slide Deck – Ontario Forest Energy Directive

CC The Hon. Caroline Mulroney, President of the Treasury Board
 The Hon. Peter Bethlenfalvy, Minister of Finance
 The Hon. Vic Fedeli, Minister of Economic Development, Job Creation and Trade
 The Hon. Greg Rickford, Minister of Northern Development and Indigenous Affairs
 The Hon. George Pirie, Minister of Mines
 The Hon. Steven Lecce, Minister of Energy and Electrification
 The Hon. Sam Oosterhoff, Associate Minister of Energy Intensive Industries
 The Hon. Todd Smith, Minister of Education
 The Hon. Paul Calandra, Minister of Municipal Affairs and Housing
 MPP John Yakabuski, Parliamentary Assistant to the Minister of Energy
 MPP Kevin Holland, Parliamentary Assistant to the Minister of Mines
 Deputy Minister Drew Vanderduim, Ministry of Natural Resources
 OFIA Membership

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.7.
Resolution Number 2024-368
Title: Resolution Stemming from August 14, 2024 Regular Meeting of Council - Item 7.1
- Correspondence #19
Date: October 16, 2024

Moved by: Councillor Laframboise
Seconded by: Councillor Pothier

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Resolution #2024-08-07-10 passed by the Township of Brudenell, Lyndoch & Raglan, urging the Government to promptly resume the assessment cycle;
AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Premier Doug Ford; the Minister of Municipal Affairs and Housing, Paul Calandra; the Association of Municipalities of Ontario (AMO); our local Member of Provincial Parliament (MPP); and all Ontario Municipalities.

CARRIED


MAYOR



**TOWNSHIP OF
BRUDENELL, LYNDOCH AND RAGLAN**

42 Burnt Bridge Road, PO Box 40
Palmer Rapids, Ontario K0J 2E0
TEL: (613) 758-2061 · FAX: (613) 758-2235

August 7, 2024

The Honourable Doug Ford, Premier of Ontario
Premier's Office
Room 281, Legislative Building, Queen's Park
Toronto, ON M7A 1A1

Dear Premier Ford,

Re: Urging the Government to Promptly Resume Assessment Cycle

Please be advised that at their last Regular Meeting of Council on Wednesday August 7th, 2024, the Council for the Corporation of the Township of Brudenell, Lyndoch and Raglan supported the following resolution:

Resolution # 2024-08-07-10
Moved By: Councillor Quade
Seconded by: Councillor Keller

"Be It resolved that the Council of the Corporation of the Township of Brudenell, Lyndoch and Raglan hereby supports the resolution from the Municipality of Callander urging the Government to promptly resume the assessment cycle.

And further that Council directs staff to provide a copy of this resolution to the Premier, the relevant provincial authorities, the Association of Municipalities in Ontario, the Rural Ontario Municipalities Association, the Federation of Northern Ontario Municipalities, the Municipal Property Assessment Corporation, and all municipalities in Ontario for their consideration, to make proper changes as quickly and efficiently as possible."

CARRIED.

Sincerely,

Tammy Thompson
Deputy Clerk



31 May 2024

Premier Doug Ford premier@ontario.ca

RE: Urging the Government to Promptly Resume Assessment Cycle

Please be advised that the Council of the Corporation of the Municipality of Callander passed the following resolution at its Regular Meeting of Council held Tuesday, May 28, 2024.

Resolution No. 2024/05/184:

7.4(c) WHEREAS the assessment cycle is an essential process for maintaining the fairness and predictability of property taxes in our province;

AND WHEREAS the pause in the reassessment cycle has created uncertainty and instability in property taxation, impacting both residential and commercial property owners;

AND WHEREAS the government has delayed an assessment update again in 2024, resulting in Ontario's municipalities continuing to calculate property taxes using 2016 property values;

AND WHEREAS both current and outdated assessments are inaccurate, increase volatility, and are not transparent;

AND WHEREAS frequent and accurate reassessments are necessary to stabilize property taxes and provide predictability for property owners, residents, and businesses alike;

AND WHEREAS the staff at the Municipal Property Assessment Corporation would benefit from further skills enhancement and training in assessments, recognizing the importance of ensuring accurate evaluations for 100% of our municipality;

AND WHEREAS the Government has announced a review of the property assessment and taxation system with a focus on fairness, equity, and economic competitiveness, and therefore further deferring new property assessment;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Municipality of Callander hereby calls upon the Premier to promptly resume the assessment cycle to ensure the stability and predictability of property taxes while the Government conducts its review of the property assessment and taxation system, or respond with an alternative method for every municipality in Ontario to achieve fair taxation;

AND THAT all Municipalities in Ontario and their constituents are encouraged to apply pressure to the Premier, daily, weekly, and monthly, to resolve the situation before it causes undo stress to everyone in the Municipality;

AND THAT a copy of this resolution be forwarded to the Premier, the relevant provincial authorities, the Association of Municipality in Ontario, the Rural Ontario Municipalities Association, the Federation of Northern Ontario Municipalities, the Municipal Property Assessment Corporation, and all municipalities in Ontario for their consideration, to make proper changes as quickly and efficiently as possible.

Thank you,



**Cindy Pigeau
Municipal Clerk**

**Copy to: Association of Municipalities of Ontario
Rural Ontario Municipalities Association
Federation of Northern Ontario Municipalities
Municipal Property Assessment Corporation
All Ontario Municipalities**

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council

Agenda Number: 8.8.
Resolution Number 2024-369
Title: Resolution Stemming from September 18, 2024 Regular Meeting of Council - Item 7.1 - Correspondence #11
Date: October 16, 2024

Moved by: Councillor Laframboise
Seconded by: Councillor Pothier

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Motion No. 24-366 passed by the City of Quinte West, regarding the Canada Community-Building Fund;

AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Prime Minister, Justin Trudeau; the Minister of Finance, Chrystia Freeland; the Minister of Housing, Infrastructure and Communities, Sean Fraser; the Association of Municipalities of Ontario (AMO); our local Member of Parliament (MP); and all Ontario Municipalities.

CARRIED


MAYOR

P.O. Box 490
7 Creswell Drive
Trenton, Ontario K8V 5R6
www.quintewest.ca



A Natural Attraction

Tel: 613-392-2841
Toll Free: 1-866-485-2841
virinial@quintewest.ca
clerk@quintewest.ca

Virginia LaTour, Deputy City Clerk

August 15, 2024

The Right Honourable Justin Trudeau
Office of the Prime Minister
80 Wellington Street
Ottawa, ON K1A 0A2
Via Email - justin.trudeau@parl.gc.ca

RE: Notice of Motion – Councillor Stedall – The Canada Community-Building Fund

Dear Prime Minister:

This letter will serve to advise that at a meeting of City of Quinte West Council held on August 14, 2024 Council passed the following resolution:

Motion No 24-366 – Notice of Motion - Councillor Stedall - The Canada Community-Building Fund
Moved by Councillor Stedall
Seconded by Councillor McCue

Whereas the City of Quinte West is entering into an agreement to receive Canada Community-Building Funds, which is administered by the Association of Ontario Municipalities of Ontario (AMO) on behalf of the Federal government;

And whereas the funding allocations are less that 2% year over year for the next 5 years;

And whereas the amounts allocated in the past 5 years were less than 2% year over year;

And whereas non-residential construction price inflation has risen by 29% since the end of 2020 and municipalities are facing soaring costs for infrastructure projects without a corresponding growth in revenue;

And whereas there is a requirement for municipalities to complete an asset management plan and a housing needs analysis;

And whereas both of these plans show the large funding gap between infrastructure and housing needs and funds available from property taxation;

And whereas The City of Quinte West has over \$1.5 billion in core infrastructure assets and, like other municipalities, its infrastructure is aging and in need of upgrades and replacement;

And whereas The City's Asset Management Plan requires \$37 million annually to maintain existing assets which, based on current available funding, is resulting in an annual infrastructure deficit of over \$17.1 million;

And whereas municipalities are facing a gap in federal infrastructure funding as the 10-year Investing in Canada Infrastructure Program has come to an end;

Now therefore be it resolved that the City of Quinte West calls on the Federal Government to provide a supplement to the allocations provided to municipalities under the AMO CBBF agreement for 2024 - 2028 for the same amount that was allocated, effectively doubling the allocation for those years;

And further that this resolution be forwarded to MFOA, AMO, MP Ryan Williams, and Federal Finance Minister Chrystia Freeland, and all Municipalities in Ontario.
Carried

We trust that you will give favourable consideration to this request.

Yours Truly,

CITY OF QUINTE WEST

A handwritten signature in black ink, appearing to read 'Virginia LaTour', written over a horizontal line. The signature is stylized and somewhat cursive.

Virginia LaTour,
Deputy City Clerk

cc: Donna Herridge, Executive Director, MFOA
Colin Best, President, AMO
Ryan Williams, MP, Bay of Quinte
Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance
All Municipalities of Ontario

The Corporation of the Municipality of St. Charles
RESOLUTION PAGE



Regular Meeting of Council


Agenda Number: 8.9.
Resolution Number 2024-370
Title: Resolution Stemming from September 18, 2024 Regular Meeting of Council - Item 7.1 - Correspondence #17
Date: October 16, 2024

Moved by: Councillor Laframboise
Seconded by: Councillor Pothier

BE IT RESOLVED THAT Council for the Corporation of the Municipality of St.-Charles hereby supports Resolution 2024-EM1-2 passed by the Township of Nairn and Hyman and the Township of Baldwin, regarding concerns with the transport and deposition of Naturally Occurring Radioactive Material (NORM) at the Agnew Lake Tailings Management Area;

AND BE IT FURTHER RESOLVED THAT a copy of this Resolution be sent to the Premier of Ontario, Doug Ford; the Minister of Mines, George Pirie; the Minister of Transportation, Prabmeet Sarkaria; the Minister of the Environment, Conservation and Parks, Andrea Khanjin; the Association of Municipalities of Ontario (AMO); our local Member of Provincial Parliament (MPP); and all Ontario Municipalities.

CARRIED


MAYOR



August 21, 2024

Sent via email: premier@ontario.ca

The Honourable Doug Ford
Premier of Ontario
Premier's Office, Room 281
Legislative Building, Queen's Park
Toronto, ON M7A 1A1

RE: Concerns with the Transport and Deposition of Naturally Occurring Radioactive Material (NORM) at the Agnew Lake Tailings Management Area (ALTMA)

Dear Premier Ford,

I am writing to you on behalf of the Council of the Township of Nairn and Hyman and the Council of the Township of Baldwin to formally submit the attached resolution passed jointly by the two Councils at a Joint Emergency Council Meeting on August 19, 2024.

Our two Townships very recently learned of the decision to transport naturally occurring radioactive material (NORM) from the former Beaucage Mine Site and Nipissing First Nation reserve lands and deposit it at the Agnew Lake Tailings Management Area in the Township of Nairn and Hyman. The decision to transport and deposit NORM has far-reaching implications for the environment, public health, and safety of our communities, and this significant decision was made without any consultation with our municipalities and the other municipalities located near Agnew Lake or along the Highway 17 corridor.

In addition to the participation of our municipalities in this Emergency Council Meeting, many representatives from surrounding First Nations attended the meeting, underscoring the widespread concern across our region about this impending project. The planned transportation of NORM is scheduled to begin in the coming weeks, therefore we respectfully request your attention to this urgent matter.

The resolution reads as follows:

RESOLUTION: 2024-EM1-2

DATE: August 19, 2024

MOVED BY: Councillor McVey

SECONDED BY: Councillor Cote

WHEREAS the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin have been informed of the decision to transport naturally occurring radioactive material (NORM) from the former Beaucage Mine and Nipissing First Nation reserve land, and deposit it at the Agnew Lake Tailings Management Area (ALTMA) in the Township of Nairn and Hyman; and

WHEREAS this decision has significant implications for the environment, public health, and safety of the surrounding communities, including those within the Township of Nairn and Hyman and the Township of Baldwin; and

WHEREAS the decision to transport and deposit NORM to the ALTMA site was made without any consultation with the Township of Nairn and Hyman or the other municipalities bordering Agnew Lake, resulting in the exclusion of local municipalities from the decision-making process; and

WHEREAS the exclusion of local municipalities from this process represents a serious breach of trust and a disregard for the well-being of the residents of these communities; and

WHEREAS there are significant concerns among residents regarding the potential contamination of drinking water sources, particularly Agnew Lake, which many residents rely on for safe drinking water; and

WHEREAS the risks associated with NORM are well-documented, and the proximity of the ALTMA to Agnew Lake heightens the concerns regarding the potential contamination of this vital water source; and

WHEREAS according to information received from the Ministry of Mines, there are already some areas of the ALTMA site where dose estimates exceed the Canadian Nuclear Safety Commission's regulatory limit for casual site users; and

WHEREAS the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin held a joint Emergency Council Meeting on August 19, 2024;

THEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin respectfully demands that the Province of Ontario, the Ministry of Mines and the Ministry of Transportation immediately halt the project involving the transportation and deposition of NORM at the ALTMA site until a clear line of communication is established with local municipalities; and

BE IT FURTHER RESOLVED THAT the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin respectfully demands full disclosure of all pertinent details regarding the proposed future NORM transportation and deposition plan, including specific transportation routes, emergency response plans, safety protocols, and the future management plan for the ALTMA site; and

THAT the Council of the Corporation of the Township of Nairn and Hyman and the Council of the Corporation of the Township of Baldwin insists that environmental and health impact assessments be conducted with input from independent experts, and that these assessments include opportunities for public hearings to ensure transparency and community involvement; and

THAT the Province of Ontario enact legislation that consultation with municipalities is a requirement of any projects that include the transportation or deposition of NORM; and

THAT a copy of this resolution be forwarded to the Honourable Doug Ford, Premier of Ontario; the Honourable George Pirie, the Minister of Mines; the Honourable Prabmeet Sarkaria, the Minister of Transportation; the Honourable Andrea Khanjin, the Minister of the Environment, Conservation and Parks; Chief Toulouse and Sagamok Anishnawbek Council Members; Chief Nootchtai and Atikameksheng Anishnawbek Council Members; the Ontario Ombudsman; the Canadian Nuclear Safety Commission; the Canadian Environmental Law Association; MP Carol Hughes; MPP Michael Mantha; the Association of Ontario Municipalities and all Ontario Municipalities.

CARRIED

For more information regarding this matter, please contact our municipal office by email at belindaketchabaw@nairncentre.ca or by phone at (705) 869-4232.

Yours truly,



Belinda Ketchabaw
CAO Clerk Treasurer
Township of Nairn and Hyman

Cc:

Honourable George Pirie, the Minister of Mines
Honourable Prabmeet Sarkaria, the Minister of Transportation
Honourable Andrea Khanjin, the Minister of the Environment, Conservation and Parks
Chief Toulouse and Sagamok Anishnawbek Council Members
Chief Nootchtai and Atikameksheng Anishnawbek Council Members
Ontario Ombudsman
Canadian Nuclear Safety Commission
Canadian Environmental Law Association
MP Carol Hughes
MPP Michael Mantha
Association of Ontario Municipalities
All Ontario Municipalities



Northumberland County

Council Resolution

SENT VIA EMAIL

October 21, 2024

Hon. Doug Ford (Premier of Ontario)
 Hon. Paul Calandra (Minister of Municipal Affairs and Housing)
 Hon. David Piccini (Minister of Labour Immigration, Training and Skills Development and
 MPP for Northumberland-Peterborough South)
 Association of Municipalities of Ontario (AMO)
 All Ontario Municipalities

Re: Correspondence, Township of Stirling-Rawdon 'Public Sector Salary Disclosure

At a meeting held on October 16, 2024 Northumberland County Council approved Council Resolution # 2024-10-16-717, adopting the below recommendation from the October 1, 2024 Corporate Support Committee meeting:

Moved by: Councillor John Logel

Seconded by: Council Alternate Michael Metcalf

"**That** the Corporate Support Committee, having considered the correspondence from the Township of Stirling-Rawdon regarding 'Public Sector Salary Disclosure', recommend that County Council support the correspondence and direct staff to send a copy of this resolution to the Honourable Doug Ford (Premier of Ontario), the Honourable Paul Calandra (Minister of Municipal Affairs and Housing), the Honourable David Piccini (Minister of Labour, Immigration, Training and Skills Development and MPP for Northumberland- Peterborough South), the Association of Municipalities of Ontario (AMO), and all Ontario Municipalities."

Council Resolution # 2024-10-16-717

Carried

If you have any questions regarding this matter, please do not hesitate to contact the undersigned at matherm@northumberland.ca or by telephone at 905-372-3329 ext. 2238.

Sincerely,
 Maddison Mather



Manager of Legislative Services / Clerk
 Northumberland County



Council Resolution

Moved By J. Logel Agenda Item 10 Resolution Number 2024-10-16- 717
 Seconded By M. Metcalf


Council Date: October 16, 2024

"That Council adopt all recommendations from the four Standing Committees, as contained within the Committee Minutes (meetings held September 30, 2024 and October 1 and 2, 2024), with the exception of the following items (referenced from the Standing Committee Minutes), that will be held for discussion:

Committee Name	Item #	Description	Held By
		- Economic Development, Tourism and Land Use Planning Committee, Item 9.b, Correspondence, Ministry of Municipal Affairs and Housing 'Request to Repeal Official Plan Amendments Adopting By-law' – Held by Councillor Logel	
		- Public Works Committee, Item 9.a, Report 2024-122, 'Transfer of Thompson Bridge from Northumberland County to the Municipality of Trent Hills' – Held by Council Alternate Michael Metcalf.	
		- Social Services Committee, Item 5.a, Delegation, James Bisson 'Homelessness and Encampment Response Report' – Held by Deputy Warden Hankivsky	
		- Social Services Committee, Item 8.a(1), Delegation, Vivian Vandenhazel 'Encampment Response and Progress on 310 Division Street, Cobourg Update – Presentation' – Held by Councillor Cleveland	
		- Social Services Committee, Item 8.a(2), Encampment Response and Progress on 310 Division Street, Cobourg Update - Presentation – Held by Councillor Cleveland	

And Further That the items listed above and held for separate discussion each require a separate resolution."

Recorded Vote Requested by _____
 Councillor's Name

Carried 
 Warden's Signature

Deferred _____
 Warden's Signature

Defeated _____
 Warden's Signature



Corporate Support Committee Resolution

Committee Meeting Date: October 1, 2024

Agenda Item: 7.a

Resolution Number: 2024-10-01- 615

Moved by: S. Dibb

Seconded by: B. Ostrander

Council Meeting Date: October 16, 2024

"**That** the Corporate Support Committee, having considered the correspondence from the Township of Stirling-Rawdon regarding 'Public Sector Salary Disclosure', recommend that County Council support the correspondence and direct staff to send a copy of this resolution to the Honourable Doug Ford (Premier of Ontario), the Honourable Paul Calandra (Minister of Municipal Affairs and Housing), the Honourable David Piccini (Minister of Labour, Immigration, Training and Skills Development and MPP for Northumberland- Peterborough South), the Association of Municipalities of Ontario (AMO), and all Ontario Municipalities."

Carried 
Committee Chair's Signature

Defeated _____
Committee Chair's Signature

Deferred _____
Committee Chair's Signature



2529 Stirling-Marmora Road
 Box 40
 Stirling, ON K0K 3E0
 Phone: 613-395-3380 Fax: 613-395-0864

August 21, 2024

Premier's Office
 Room 281
 Legislative Building, Queen's Park
 Toronto, ON M7A 1A1

Dear Hon. Ford,

Re: Public Sector Salary Disclosure

At the August 6, 2024 Standing Committees meeting, Committee made the following recommendation:

Moved by Councillor Dean Graff
Seconded by Councillor Don Stewart

That the report from the CAO-Treasurer entitled, "Public Sector Salary Disclosure" be received; and

That Committee recommends to Council the following resolution be adopted and forwarded to the Province of Ontario Premier's Office, the Ministry of Municipal Affairs and Housing, the Association of Municipalities of Ontario and all Ontario Municipalities;

Now Therefore Be It Resolved That the Public Sector Salary Disclosure Act be updated to reflect the inflation rates since 1996; and further

That the Act be further updated so that the inflation rate is applied each year to the requirement to report public salaries.

Carried.

This resolution was subsequently ratified and confirmed by Council at their meeting of August 19, 2024.

Sincerely,

Sydney Dodson
 Deputy Clerk

/sd

Cc: Roxanne Hearn – CAO/Treasurer, Premier Doug Ford, the Ministry of Municipal Affairs and Housing, AMO, all Ontario Municipalities

From: [Sawden, Vanessa](#)
To: [Sawden, Vanessa](#)
Subject: Temporary Lane Closure: Davis Drive, Town of Newmarket, October 24-27
Date: October 21, 2024 4:19:18 PM
Attachments: [Map of Lane Closure, Davis Drive, Town of Newmarket.png](#)

CAUTION: This email originated outside of the Town of Newmarket. **DO NOT** click links or open attachments unless you recognize the sender and trusted content.

TEMPORARY LANE CLOSURE ON DAVIS DRIVE

Town of Newmarket

This email is to advise of the temporary lane closure on **Davis Drive eastbound, between Harry Walker Parkway and the Highway 404 south ramp, in the Town of Newmarket.**

Description:

- Davis Drive eastbound, between Harry Walker Parkway and the Highway 404 south ramp, will be closed to facilitate construction of a retail development on Harry Walker Parkway

Duration:

- **Thursday, October 24, 2024 at 6 a.m. to Sunday, October 27, 2024 at 9 p.m.**

Impacts to Travellers:

- Signs will be in place to guide travellers

As with all road construction projects, work may be rescheduled due to weather. York Region will provide advance notice whenever possible.

If you have questions about this temporary lane closure, please contact:

- Nelson Costa, Manager, Corridor Control and Safety, at 905-955-1470 or nelson.costa@york.ca

For general inquiries, please contact Public Works at 1-877-464-9675 ext. 75000 or via email at transportation@york.ca

For after-hours emergencies, please contact York Region's Roads and Traffic Operations Centre at 1-877-464-9675 ext. 75200.

Please communicate this information with your colleagues as appropriate.

Best,

Vanessa

Our working hours may be different. Please don't feel obliged to respond outside of your scheduled working hours. Let's work together to help foster healthy work-life boundaries.

Vanessa Sawden (she/her) | Communications and Engagement Associate
Community Engagement and Marketing Sustainability, Communication and Innovation, Public Works

The Regional Municipality of York | 17250 Yonge Street | Newmarket, ON L3Y 6Z1
416-720-3712 | vanessa.sawden@york.ca | york.ca | [Chat with me on Teams](#)

Our Mission: **Working together to serve our thriving communities – today and tomorrow**

Leslie Street

Town of
Newmarket

Town of
East Gwillimbury

Davis Drive

Harry Walker Parkway

Town of
Whitchurch-
Stouffville

Highway 404



 **Lane closure**

 **Municipal boundary**



October 21, 2024

The Honourable Doug Ford, Premier of Ontario
 Premier's Office, Room 281
 Legislative Building, Queen's Park
 Toronto, ON M7A 1A1

Delivered by email
premier@ontario.ca

Dear Premier:

Re: Town of Whitchurch-Stouffville Council Resolution of September 11, 2024, Re: AMO Policy Update – Call to Action: Social and Economic Prosperity Review

Please be advised that this matter was considered by Council at its meeting held on September 11, 2024, and Council passed the following resolution:

Moved by: Councillor Upton
Seconded by: Councillor Acton

WHEREAS current provincial-municipal fiscal arrangements are undermining Ontario's economic prosperity and quality of life; and

WHEREAS nearly a third of municipal spending in Ontario is for services in areas of provincial responsibility and expenditures are outpacing provincial contributions by nearly \$4 billion a year; and

WHEREAS municipal revenues, such as property taxes, do not grow with the economy or inflation; and

WHEREAS unprecedented population and housing growth will require significant investments in municipal infrastructure; and

WHEREAS municipalities are being asked to take on complex health and social challenges – like homelessness, supporting asylum seekers and addressing the mental health and addictions crises; and

WHEREAS inflation, rising interest rates, and provincial policy decisions are sharply constraining municipal fiscal capacity; and

WHEREAS property taxpayers – including people on fixed incomes and small businesses – can't afford to subsidize income re-distribution programs for those most in need; and

WHEREAS the province can, and should, invest more in the prosperity of communities; and

WHEREAS municipalities and the provincial government have a strong history of collaboration.

NOW THEREFORE BE IT RESOLVED THAT the Province of Ontario commit to undertaking with the Association of Municipalities of Ontario a comprehensive social and economic prosperity review to promote the stability and sustainability of municipal finances across Ontario; and

THAT a copy of this motion be sent to the Premier of Ontario (premier@ontario.ca); Minister of Municipal Affairs and Housing (minister.mah@ontario.ca); the Minister of Finance (minister.fin@ontario.ca); to the Association of Municipalities of Ontario (amo@amo.on.ca), and to all York Region Municipalities.

Carried

The above is for your consideration and any attention deemed necessary.

Kind regards,

Monica Beattie

Monica Beattie
Council/Committee Coordinator

Copy: Hon. Paul Calanda, Minister of Municipal Affairs and Housing
Hon. Peter Bethlenfalvy, Minister of Finance
Association of Municipalities of Ontario (AMO)
All York Region Municipalities



CLEARVIEW
TOWNSHIP

Clerk's Department
Township of Clearview
Box 200, 217 Gideon Street
Stayner, Ontario L0M 1S0
clerks@clearview.ca | www.clearview.ca
Phone: 705-428-6230

October 22, 2024

Ministry of Agriculture, Food and Rural Affairs
Hon. Rob Flack

Sent by Email: Rob.Flack@pc.ola.org

RE: Request for Support – Increase Tile Drain Loan Limit

Please be advised at its meeting held on October 21, 2024, Council of the Township of Clearview passed the following resolution supporting the Township of Adelaide Metcalfe's request that the Province consider increasing the maximum annual Tile Drain Loan Limit:

Moved by Councillor Beelen, Seconded by Councillor McArthur, Be It Resolved that Council of the Township of Clearview hereby support the motion from the Township of Adelaide Metcalfe requesting that the Province, through the Ministry of Agriculture, Food and Rural Affairs, consider increasing the maximum annual Tile Drain Loan Limit to a minimum of \$100,000; and,

That Council direct staff to send this support motion to the Honourable Rob Flack - Ministry of Agriculture, Food and Rural Affairs (OMAFRA), the Association of Municipalities of Ontario (AMO), the Rural Ontario Municipal Association (ROMA), and all Ontario municipalities. Motion Carried.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Sincerely,

Sasha Helmkey-Playter, B.A., Dipl. M.A., AOMC
Clerk/Director of Legislative Services

cc: Association of Municipalities of Ontario (AMO)
Rural Ontario Municipal Association (ROMA)
All Ontario Municipalities



March 22nd, 2024

The Honourable Lisa Thompson
Ministry of Agriculture, Food and Rural Affairs
11th Floor
77 Grenville St.
Toronto, ON M5S 1B3

RE: Township of Adelaide Metcalfe – Request to Increase Tile Drain Loan Limit

Dear Minister Thompson,

On March 18, 2024, the Township of Adelaide Metcalfe Council approved the following resolution:

WHEREAS farm drainage is of paramount importance in Ontario due to its significant impact on agricultural productivity and sustainability. Effective drainage systems help mitigate waterlogging, control soil moisture levels, and enhance soil structure, thereby optimizing growing conditions for crops;

WHEREAS improved drainage also facilitates timely field operations, reduces erosion, and minimizes nutrient runoff, contributing to environmental conservation efforts;

WHEREAS Ontario's diverse agricultural landscape, where weather variability is common, well-maintained drainage systems play a crucial role in ensuring stable yields, economic viability, and long-term resilience for farmers across the Province;

WHEREAS the Tile Loan Drainage Act, R.S.O 1990, c. T.8 allows for the borrowing of money for the purpose of constructing drainage works;

WHEREAS the maximum annual limit for these loans, unchanged since 2004, is currently set at \$50,000.

WHEREAS costs for Tile Drainage has increased markedly since 2004;

NOW THEREFORE the Council of the Township of Adelaide Metcalfe requests that the Province through the Ministry of Agriculture, Food and Rural Affairs (OMAFRA) consider increasing the maximum annual Tile Loan limit to a minimum of \$100,000.

AND THAT this resolution be circulated the Honourable Lisa Thompson – Ministry of Agriculture, Food and Rural Affairs (OMAFRA), the Association of Municipalities of Ontario (AMO), the Rural Ontario Municipal Association (ROMA), and all Ontario municipalities.

From: [So, Kelvin](#)
To: [Michael de Rond](#); [tlajevardi@eastgwillimbury.ca](#); [awalkom@eastgwillimbury.ca](#); [rdillabough@georgina.ca](#); [Suzanne Cudnik](#); [kkitteringham@markham.ca](#); [Lisa Lyons](#); [becky.jamieson@townofws.ca](#); [todd.coles@vaughan.ca](#)
Cc: [clerks@aurora.ca](#); [clerks@eastgwillimbury.ca](#); [clerks@king.ca](#); "clerks@markham.ca"; Clerks; [clerks@richmondhill.ca](#); [clerks@townofws.ca](#); "clerks@vaughan.ca"
Subject: York Region Transit: November Service Changes and PRESTO E-Tickets App
Date: October 22, 2024 9:19:49 AM

CAUTION: This email originated outside of the Town of Newmarket. **DO NOT** click links or open attachments unless you recognize the sender and trusted content.

Hello,

York Region Transit (YRT) service changes will take effect on Sunday, November 3, 2024

Schedule and route adjustments will be made to various routes to match customer demand, including:

- Viva blue operating between Bernard Terminal and Finch GO Bus Terminal will be renamed Viva blue B
- Viva pink will be discontinued to reduce duplication of service along Yonge Street and Highway 7; travellers can continue to use Viva blue/blue B on Yonge Street and Viva purple/purple A on Highway 7
- Seasonal adjustments on Route 320 – Jane Express and Route 360 - Vaughan Mills/Wonderland to meet ridership demand for holiday season shopping and Winterfest
- For more information visit yrt.ca/ServiceChanges

Travellers will be informed of these changes through notices posted at bus stops, on-bus, terminal and vivastation announcements, media advisory, YRT Contact Centre, yrt.ca and social media @YRTViva.

NEW PRESTO E-Tickets app

In late November, YRT will be transitioning all e-ticket purchases to PRESTO E-Tickets. As a result, the YRT Pay app will be discontinued and travellers will no longer be able to purchase e-tickets in Transit app. All unused tickets will automatically be transferred to PRESTO E-Tickets. YRT travellers will be informed of the changes through an October 16 Metrolinx-issued announcement, in-app communications, direct emails to app users, social media and yrt.ca/PRESTOeTickets.

If you have any questions about these changes, please contact:

- Richard Montoya, Director, Transit Operations, York Region Transit, at 1-877-464-9675 ext. 75928 or Richard.Montoya@york.ca
- Tamas Hertel, Manager, Service Planning, York Region Transit, at 1-877-464-9675 ext. 76047 or Tamas.Hertel@york.ca

For general inquiries, please contact the YRT Contact Centre at 1-866-668-3978 or via email at transitinfo@york.ca

Sincerely,

Our working hours may be different. Please do not feel obligated to reply outside of your scheduled working hours. Let's work together to help foster healthy work-life boundaries.

Kelvin So | Communications and Engagement Associate
Sustainability, Communication and Innovation, Public Works

The Regional Municipality of York | 17250 Yonge Street | Newmarket, ON L3Y 6Z1
1-877-464-9675 ext. 75848 | Kelvin.So@york.ca | york.ca

Our Mission: **Working together to serve our thriving communities – today and tomorrow**



The Town of The Blue Mountains
Council Meeting

Title: Scott R. Butler, Executive Director, Ontario Good Roads Association and Antoine Boucher, President, Ontario Good Roads Board of Directors

Date: Monday, October 21, 2024

Moved by: Councillor McKinlay

Seconded by: Councillor Maxwell

THAT Council of the Town of The Blue Mountains receives for information the correspondence of Scott R. Butler, Executive Director, Ontario Good Roads Association and Antoine Boucher, President, Ontario Good Roads Board of Directors Re: Request for Council Consideration of Support for Resolution regarding the Establishment of an Ontario Rural Road Safety Program;

WHEREAS official statistics from the Government of Ontario confirm that rural roads are inherently more dangerous than other roads;

AND WHEREAS, despite only having 17% of the population, 55% of the road fatalities occur on rural roads;

AND WHEREAS, rural, northern, and remote municipalities are fiscally strained by maintaining extensive road networks on a smaller tax base;

AND WHEREAS, preventing crashes reduces the burden on Ontario's already strained rural strained health care system;

AND WHEREAS, roadway collisions and associated lawsuits are significant factors in runaway municipal insurance premiums. Preventing crashes can have a significant impact in improving municipal risk profiles;

THEREFORE, BE IT RESOLVED THAT the Town of The Blue Mountains requests that the Government of Ontario take action to implement the rural road safety program that Good Roads has committed to lead. It will allow Ontario's rural municipalities to make the critical investments needed to reduce the high number of people being killed and seriously injured on Ontario's rural roads; and

FURTHER THAT a copy of this resolution be forwarded to Premier Doug Ford, Hon. Prabmeet Sarkaria, Minister of Transportation, Hon. King Surma, Minister of Infrastructure, Hon. Rob Flack, Minister of Agriculture, Hon. Lisa Thompson, Minister of Rural Affairs, Hon. Trevor Jones, Associate Minister of Emergency Preparedness and Response, and Hon. Sylvia Jones, Minister of Health, and Good Roads; and

FURTHER THAT this resolution be circulated to all municipalities in Ontario requesting their support.

YES: 6

NO: 0

CONFLICT: 0

ABSENT: 1

The motion is Carried

YES: 6

Mayor Matrosovs

Councillor Ardiel

Councillor Hope

Councillor Maxwell

Councillor McKinlay

Councillor Porter

NO: 0

CONFLICT: 0

ABSENT: 1

Deputy Mayor Bordignon

From: Scott Butler <scott@goodroads.ca>
Sent: Wednesday, October 9, 2024 12:07 PM
To: Town Clerk <townclerk@thebluemountains.ca>
Subject: Establishment of an Ontario Rural Road Safety Program

Good Roads

Wednesday, October 09, 2024

To: Town of The Blue Mountains Head of Council and Council Members

Sent via email to: townclerk@thebluemountains.ca

Subject: Establishment of an Ontario Rural Road Safety Program

Too many Ontarians are being seriously injured or killed on our roads.

In 2023, there were 616 people killed and 36,090 people injured. The number of fatalities is up nearly 20% in the last ten years.

In 2021, the most recent year of complete data from MTO's *Ontario Road Safety Annual Report* (ORSAR), there were 561 fatalities – 426 of which occurred on municipal roads. While rural Ontario only represents 17% of the province's population, 55% of these deaths occurred on rural roads. By any measure, Ontario's rural roads are disproportionately more dangerous.

At the same time, municipal insurance premiums continue to increase. With no plausible reform being considered for joint and several liability, municipalities need to find innovative means for managing risk, particularly on their roadways,

To deal with this crisis, Good Roads has designed a multifaceted rural road safety program and have been in discussions with the Ministry of Transportation to fund it. The program would target a municipality's most dangerous roads, perform road safety audits, and install modern safety infrastructure that prevents serious injuries and save lives. This program is designed to be cost effective while also providing rural municipalities with a direct means for addressing risk associated with their roadways.

Good Roads has proposed leading a five-year \$183 million program that leverages our 131 years of municipal road expertise and our industry partnerships to quickly put in place the solutions that will address some of Ontario's most dangerous roads.

Good Roads is seeking support to address these preventable tragedies.

If the Town of The Blue Mountains would be interested in pursuing this, a Council resolution similar to the example below should be adopted and sent to the Premier and the Minister of Transportation:

WHEREAS official statistics from the Government of Ontario confirm that rural roads are inherently more dangerous than other roads;

AND WHEREAS, despite only having 17% of the population, 55% of the road fatalities occur on rural roads;

AND WHEREAS, rural, northern, and remote municipalities are fiscally strained by maintaining extensive road networks on a smaller tax base;

AND WHEREAS, preventing crashes reduces the burden on Ontario's already strained rural strained health care system;

AND WHEREAS, roadway collisions and associated lawsuits are significant factors in runaway municipal insurance premiums. Preventing crashes can have a significant impact in improving municipal risk profiles;

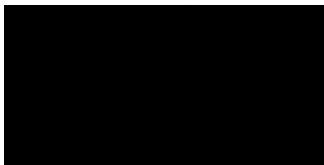
THEREFORE, BE IT RESOLVED THAT the Town of The Blue Mountains requests that the Government of Ontario take action to implement the rural road safety program that Good Roads has committed to lead. It will allow Ontario's rural municipalities to make the critical investments needed to reduce the high number of people being killed and seriously injured on Ontario's rural roads; and

FURTHER THAT a copy of this resolution be forwarded to Premier Doug Ford, Hon. Prabmeet Sarkaria, Minister of Transportation, Hon. King Surma, Minister of Infrastructure, Hon. Rob Flack, Minister of Agriculture, Hon. Lisa Thompson, Minister of Rural Affairs, Hon. Trevor Jones, Associate Minister of Emergency Preparedness and Response, and Hon. Sylvia Jones, Minister of Health, and Good Roads; and

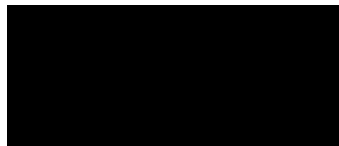
FURTHER THAT this resolution be circulated to all municipalities in Ontario requesting their support.

If you have any questions regarding this initiative please contact Thomas Barakat, Good Roads' Manager of Public Policy & Government Relations, at thomas@goodroads.ca at your convenience.

Sincerely,



Scott R. Butler
Executive Director



Antoine Boucher
President
Good Roads Board of Directors

THE CORPORATION OF THE TOWNSHIP OF LARDER LAKE
69 Fourth Avenue, Larder Lake, ON
 Phone: 705-643-2158 Fax: 705-643-2311



MOVED BY:
 Thomas Armstrong
 Patricia Hull
 Paul Kelly
 Lynne Paquette

SECONDED BY:
 Thomas Armstrong
 Patricia Hull
 Paul Kelly
 Lynne Paquette

Motion #: 7
 Resolution #: 7
 Date: October 22, 2024

BE IT RESOLVED THAT Council for the Corporation of the Township of Larder Lake hereby supports resolution no. 2024-325 passed by the Municipality of St. Charles, regarding recommendations for government regulations of nicotine pouches; And

FURTHER THAT, this resolution be forwarded to the Premier of Ontario Doug Ford, the Deputy Minister of Health, Sylvia Jones; our local member of Provincial Parliament (MPP); THE Association of Municipalities of Ontario (AMO), the Public Health Sudbury & Districts and ALL Ontario Municipalities.

Recorded vote requested:

	For	Against
Tom Armstrong	✓	
Patricia Hull	✓	
Paul Kelly	✓	
Lynne Paquette	✓	
Patty Quinn	✓	

I declare this motion

<input checked="" type="checkbox"/> Carried
<input type="checkbox"/> Lost / Defeated
<input type="checkbox"/> Deferred to: _____ (enter date)
Because:
<input type="checkbox"/> Referred to: _____ (enter body)
Expected response: _____ (enter date)

Disclosure of Pecuniary Interest*

Chair: 

*Disclosed his/her (their) interest(s), abstained from discussion and did not vote on this question.

THE CORPORATION OF THE TOWNSHIP OF LARDER LAKE

69 Fourth Avenue, Larder Lake, ON
 Phone: 705-643-2158 Fax: 705-643-2311



MOVED BY:

- Thomas Armstrong
- Patricia Hull
- Paul Kelly
- Lynne Paquette

SECONDED BY:

- Thomas Armstrong
- Patricia Hull
- Paul Kelly
- Lynne Paquette

Motion #: 6

Resolution #: 6

Date: October 22, 2024

BE IT RESOLVED THAT Council for the Corporation of the Township of Larder Lake hereby supports resolution no. 24-366 passed by the City of Quinte West, regarding a call on the federal government to provide a supplement to the allocations provided to municipalities under the AMO CCBBF agreement for 2024-2028 for the same amount that was allocated, effectively doubling the allocation for those years; And

FURTHER THAT, this resolution be forwarded to MFOA, AMO, MP Charlie Angus, and Federal Finance Minister Chrystia Freeland, and all Municipalities in Ontario.

Recorded vote requested:

	For	Against
Tom Armstrong	✓	
Patricia Hull	✓	
Paul Kelly	✓	
Lynne Paquette	✓	
Patty Quinn	✓	

I declare this motion

<input checked="" type="checkbox"/> Carried
<input type="checkbox"/> Lost / Defeated
<input type="checkbox"/> Deferred to: _____ (enter date)
Because:
<input type="checkbox"/> Referred to: _____ (enter body)
Expected response: _____ (enter date)

Disclosure of Pecuniary Interest*

Chair: 

*Disclosed his/her (their) interest(s), abstained from discussion and did not vote on this question.

From: [Bonnie Adams](mailto:Bonnie.Adams)
To: mbarnier@adelaidemetcalfe.on.ca; clerk@aditos.ca; cao@admastonbromley.com; clerks@ajax.ca; arochefort@alfred-plantagenet.com; asmith@ahntp.ca; nmartin@amaranth.ca; dhomenuik@amherstburg.ca; clerk@armourtownship.ca; amyvickerymenard@armstrong.ca; kzamojski@arnprior.ca; clerk@arran-elderslie.ca; clerk@acwtownship.ca; cwhite@antownship.ca; athens@myhighspeed.ca; sue.bates@atikokan.ca; asimonian@augusta.ca; mderond@aurora.ca; karin@baldwin.ca; [wendy.cooke@barrie.ca](mailto>wendy.cooke@barrie.ca); thayer@bayham.on.ca; cmcgregor@twp.beckwith.on.ca; mtmacdonald@belleville.ca; reception@blackriver-matheson.com; rmordue@blandfordblenheim.ca; katie.scott@blindriver.ca; clerk@municipalityofbluewater.ca; cao.clerk@bonfieldtownship.org; lmcDonald@bracebridge.ca; rmurphy@townofbwg.com; cityclerksoffice@brampton.ca; clerks@brant.ca; clerks@brantford.ca; cdoiron@brighton.ca; clerks@brock.ca; fhamilton@brockton.ca; smacdonald@brockville.com; jdenkers; jdavis@brucemines.ca; dvanwyck@brucecounty.on.ca; 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Subject: EB-2024-0251 Enbridge Gas Inc - 2025 Federal Carbon Pricing Program (FCPP) Application - OEB Notice
Date: October 25, 2024 9:38:22 AM
Attachments: [EGI EB-2024-0251 APPL 20240926.pdf](#)
[NOH Enbridge 2025 FCPP EN 20241021.pdf](#)
[NOH Enbridge 2025 FCPP FR 20241021.pdf](#)

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To: The Clerks of All Municipalities in Which Enbridge Gas Supplies Gas

On September 26, 2024, Enbridge Gas filed an application with the OEB for an order or orders for gas distribution rate changes related to compliance obligations under the Greenhouse Gas Pollution Pricing Act, , as well as to recover other related account balances.

On October 21, 2024, the OEB issued the Notice of Hearing along with the Letter of Direction for the proceeding. The OEB has directed Enbridge Gas to serve a copy of the Notice of Hearing along with the application and evidence on the Clerks of all municipalities in which Enbridge Gas supplies gas.

Attached please find the OEB's Notice of Hearing (English and French) along with Enbridge Gas' application and evidence as filed with the OEB.

The OEB's Notice of Application provides information on how to become informed and involved in the proceeding. Interested parties can apply to the OEB for Intervenor Status in this proceeding by November 12, 2024.

A paper copy of the evidence filed in this proceeding is available upon request and can also be viewed on the company's website under Other Regulatory Proceedings: Regulatory Information | Enbridge Gas
<https://url.ca.m.mimecastprotect.com/s/L-NECBNZVyfoxpnizfPF2p7-m?domain=enbridgegas.com>

Please contact me if you have any questions.

Sincerely,

Bonnie Jean Adams

Regulatory Coordinator

Enbridge Gas Inc.

T: 416-495-5751

500 Consumers Road | North York Ontario | M2J 1P8

enbridgegas.com <<https://url.ca.m.mimecastprotect.com/s/tm8YCD1jXAsP7Nx5h0Fj5H9k?domain=enbridgegas.com/>>

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My working day may differ from your working day. Please do not feel obliged to reply to this email outside of your normal working hours.



Justin Egan
Technical Manager
Regulatory Applications
Regulatory Affairs

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Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive N.
Chatham, Ontario, N7M 5M1

September 26, 2024

VIA RESS AND EMAIL

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2024-0251
2025 Federal Carbon Pricing Program (FCPP) Application
Application and Evidence**

Enclosed is the application and pre-filed evidence of Enbridge Gas for its 2025 FCPP (the Application).

Enbridge Gas is seeking OEB approval of just and reasonable rates effective April 1, 2025, for the EGD and Union rate zones, to recover the costs associated with the FCPP as a pass-through to customers. Enbridge Gas is also seeking OEB approval to dispose of the 2023 balances recorded in its FCPP-related deferral and variance accounts, excluding the Customer Carbon Charge – Variance Accounts (CCCVAs), effective April 1, 2025.

Subject to the OEB's decision, Enbridge Gas intends to reflect 2025 increases to rates for the Federal Carbon Charge and Facility Carbon Charge, and the one-time billing adjustment related to the disposition of 2023 FCPP-related deferral and variance account balances as early as the April 1, 2025 Quarterly Rate Adjustment Mechanism (QRAM) application.

Enbridge Gas requests that the OEB issue orders granting the approvals requested on a final basis by February 6, 2025. 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, 2025 on an interim basis by February 6, 2025. Given the significance of Enbridge Gas's obligations related to the FCPP and considering the magnitude of the associated rate increases, it is appropriate to avoid continued accumulation of unbilled and uncollected 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,

Justin Egan
Technical 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 (EPS) program, 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 result in the following costs being incurred that are tracked through OEB-approved deferral and variance accounts:
 - a. Incremental bad debt costs;¹
 - 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, 2025;
 - 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),² effective April 1, 2025, to allow Enbridge Gas to recover

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

² 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 2023 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, 2025 QRAM.³
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:

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

The Applicant:

Attention: Justin Egan
Technical Manager Regulatory Applications
Regulatory Affairs

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The Applicant's Counsel:

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-and-

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Dated: September 26, 2024

Enbridge Gas Inc.

A handwritten signature in cursive script that reads "Justin Egan".

Justin Egan
Technical 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).

2024 Application – Enbridge Gas's 2024 Federal Carbon Pricing Program Application and pre-filed evidence (EB-2023-0196).

BEI – Baseline Emissions Intensity.

CCBDDA – Carbon Charges Bad Debt Deferral Account.

CCCVA – Customer Carbon Charge - Variance Account.

CO₂ – Carbon dioxide.

CO₂e – Carbon dioxide equivalent.

Company Use Volumes – 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).

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 EPS 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.¹

DSM – Demand Side Management.

ECCC – Environment and Climate Change Canada.

EITE – Energy Intensive and Trade Exposed.

EPP – Emissions Performance Program; launched by the MECP in June 2024, the EPP is a program funded by compliance payments collected from the EPS and allows EPS

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

Facilities to apply for funding to support projects that reduce GHG emissions at the eligible EPS facility.

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

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

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.²

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 an “EPS 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, representing one tonne of CO₂e, can be banked for future use against emissions or traded, and 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.

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

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

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) 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.⁴ 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

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

⁴ 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>

equivalent to \$95/tCO_{2e} as of April 1, 2025. This charge applies to volumes delivered by Enbridge Gas to its customers (other than EPS Facilities) and to Enbridge Gas's Company Use Volumes (i.e. distribution buildings, boilers/line heaters, and NGV fleet volumes).

FTE – Full-Time Equivalents.

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.⁵

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.⁶

GHG – Greenhouse Gas as set out in Section 3 the GGPPA.⁷

ktCO_{2e} – Kilo-tonne of carbon dioxide equivalent.

Listed Province – A province or territory covered, in whole or in part under the GGPPA.⁸

Mandatory Participant – Entities that emit 50 ktCO_{2e} 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.

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

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

⁷ Ibid, Schedule 3, Greenhouse Gases, Column 1.

⁸ Ibid, Schedule 1.

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.⁹

MECP – Ministry of the Environment, Conservation and Parks.

MW – Megawatt.

MWh – Megawatt hour.

NGV – Natural gas vehicle.

Non-Marketable Natural Gas – Natural gas other than marketable natural gas, as defined by the GGPPA.¹⁰

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 exceeded 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.¹¹

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

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

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

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.

tCO_{2e} – Metric tonne of carbon dioxide equivalent. The unit of measure of GHG emissions. A quantity of GHG, expressed in tonnes, is converted into tCO_{2e} by multiplying the quantity by the applicable global warming potential.¹²

Voluntary Participant – Entities that emit between 10 ktCO_{2e} and 50 ktCO_{2e} 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.

¹² 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 or Company) 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, 2025; (ii) approval of just and reasonable rates for all Enbridge Gas rate zones, effective April 1, 2025, to allow Enbridge Gas to recover other costs (including the Facility Carbon Charge costs) incurred in compliance with the GGPPA and Ontario's *Greenhouse Gas Emissions Performance Standards Regulation* (EPS Regulation); and (iii) approval of 2023 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, 2025.¹
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 2025 Federal Carbon Charge rate for natural gas in a timely fashion without accruing uncharged amounts, in accordance with the FCPP, beginning as early as April 1, 2025.
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

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

- 2.2 Volumes Subject to EPS
- 2.3 Management of Facility-Related Emissions and Costs
- 3. Bill Impacts
- 4. Requested Approvals

1. Background

4. On June 21, 2018, the federal *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 (EPS) program, 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 application² (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.³ In its Decision and Order regarding the 2022 Application, the OEB approved the amendments to the wording of the FCPP deferral and variance accounting orders as filed.⁴

² EB-2021-0209.

³ EB-2021-0209, Exhibit C, p.3.

⁴ EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.

7. On October 31, 2022, Enbridge Gas submitted its 2024 Phase 1 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 (GHG) emissions requirements through 2024 base rates.⁵ In the Settlement Proposal, parties agreed on harmonizing the FCPP deferral and variance accounts, on the condition that the existing Greenhouse Gas Emissions Administration Deferral Account (GGEADA) be renamed the Carbon Charges Bad Debt Deferral Account (CCBDDA) and the scope of the account be limited to recording bad debt costs associated with carbon charges.⁶ 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 Phase 1 Rebasing Application.⁷ Accordingly, as of 2024, the only FCPP-related administrative costs Enbridge Gas is recording 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 as early as April 1, 2025. 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 2023 balance in its OEB-approved FCPP-related deferral and variance accounts, excluding the small balances in the CCCVAs.⁸
9. This evidence also includes cost estimates and volume forecasts for 2025 that are meant to be used for informational purposes only. Customers will be charged the

⁵ EB-2022-0200, Exhibit 9, Tab 1, Schedule 1.

⁶ EB-2022-0200, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp.53-55.

⁷ EB-2022-0200, Decision on Settlement Proposal, August 17, 2023, p.1.

⁸ Refer to Exhibit C, Tab 1, Schedule 1, for more information on the proposal to defer disposition of the CCCVAs.

Federal Carbon Charge and Facility Carbon Charge based on actual volumes. Enbridge Gas will seek disposition of any variance to forecast for 2025 as well as FCPP-related 2025 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 m³), 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 Volumes 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 GHG emissions which included a proposal to increase the Federal Carbon Charge by \$15/tCO_{2e} annually starting in 2023, increasing to \$170/tCO_{2e} in 2030.⁹ The federal government confirmed this Federal Carbon Charge increase in July 2021.¹⁰

Schedule 2 of the GGPPA was amended on April 1, 2023 to include the Federal Carbon Charge rates from 2023 to 2030. In 2025, the Federal Carbon

⁹ 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.

¹⁰ 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>.

Charge is equivalent to \$95 per tonne of carbon dioxide equivalent (tCO_{2e}) or 18.11 ¢/m³ (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 Gas¹¹

Year	\$/tCO _{2e}	¢/m ³
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_{2e} or more per year, and a voluntary emissions threshold of 10 – 50 ktCO_{2e} per

¹¹ The GGPPA, Schedule 2 and Schedule 4, <https://laws-lois.justice.gc.ca/PDF/G-11.55.pdf>.

year for those entities that may choose to voluntarily participate in the EPS. This component of the FCPP became effective January 1, 2022.¹²

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:¹³

- (i) Pay the excess emissions charge;¹⁴ or
- (ii) Submit emissions performance units (EPUs) issued by the provincial government.

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

11. Any natural gas volumes delivered by Enbridge Gas for the period of January 1, 2025 to March 31, 2025 will continue to be charged the Federal Carbon Charge and

¹² 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.

¹³ MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, March 2024. [https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_March%202024%20\(EN\)_1.pdf](https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_March%202024%20(EN)_1.pdf)

¹⁴ Excess emissions charge is the price per unit in \$/tCO₂e. For the 2025 compliance period, the excess emissions charge is \$95/tCO₂e. <https://www.ontario.ca/laws/regulation/190241>.

Facility Carbon Charge rates approved by the OEB as part of Enbridge Gas's 2024 Application.

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

12. 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.¹⁵
13. As a "distributor", Enbridge Gas is required to remit Federal Carbon Charges related to the GGPPA to the Government of Canada monthly.
14. Enbridge Gas is also required to register under the EPS Regulation as an "EPS facility" since its transmission and storage operations are covered by an industrial activity listed in Schedule 2 of the EPS Regulation.¹⁶
15. As an "EPS Facility" under the EPS Regulation, Enbridge Gas is required to remit payment annually for any excess emissions under the EPS.
16. Enbridge Gas has estimated its 2025 cost of compliance with the GGPPA and EPS Regulation to be approximately \$3,084.32 million: \$1,901.15 million for the EGD rate zone (see Exhibit B, Tab 2 for additional detail) and \$1,183.18 million for the Union rate zones (see Exhibit B, Tab 3 for additional detail)¹⁷. In addition, Enbridge Gas estimates that it will incur 2025 bad debt costs of approximately \$13.05 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).

¹⁵ 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>.

¹⁶ The EPS Regulation, O.Reg. 241/19. <https://www.ontario.ca/laws/regulation/190241>.

¹⁷ This only includes the costs associated with utility (regulated) activity.

2.1 Volumes Subject to Federal Carbon Charge

17. 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.¹⁸
18. Under the GGPPA, Enbridge Gas is required, on a monthly basis, to:¹⁹
- 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

19. As set out in Table 1, Enbridge Gas is required to remit the 2025 Federal Carbon Charge rate of 18.11 ¢/m³ of natural gas consumed for applicable customers from April 1, 2025 to March 31, 2026. As outlined at Exhibit D, Tab 1, Schedule 1 and consistent with Enbridge Gas's treatment of 2019 to 2024 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, 2025 to March 31, 2026 is \$3,075.38 million: \$1,899.57 million for the EGD rate zone and \$1,175.81 million for the Union rate zones (please see Exhibit B for

¹⁸ To calculate Enbridge Gas's 2025 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.

¹⁹ 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, 2025 to March 31, 2026).

20. 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.
21. 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

22. As set out in Table 1, Enbridge Gas is required to remit the 2025 Federal Carbon Charge rate of 18.11 ¢/m³ 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, 2025 to March 31, 2026 is approximately \$2.55 million: \$0.78 million for the EGD rate zone and \$1.77 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, 2025 to March 31, 2026).

23. The forecast Company Use Volumes and associated Facility Carbon Charge cost estimates 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

24. 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.²⁰ For Enbridge Gas, this includes fuel used in transmission and storage compressor facilities (EPS Volumes).

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

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

26. Owners and operators of EPS-covered facilities have a compliance obligation for the portion of the EPS-covered emissions from those facilities that exceed their total annual emissions limit. Under the EPS, a facility’s total annual emissions limit is calculated based on the applicable Performance Standard (PS) and its associated annual production.²¹ As outlined by the MECP, the PS for facilities transmitting natural gas is 74.6% of the production-weighted facility baseline emissions intensity in 2025.²² The costs associated with EPS Volumes will be recovered from customers

²⁰ The EPS Regulation, O.Reg. 241/19. <https://www.ontario.ca/laws/regulation/190241>.

²¹ MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, March 2024. [https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_March%202024%20\(EN\)_1.pdf](https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEL_March%202024%20(EN)_1.pdf).

²² Ibid, Table 4.2, p.43.

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 2025 (January 1, 2025 to December 31, 2025) regulated cost associated with EPS Volumes is \$6.40 million: \$0.80 million for the EGD rate zone and \$5.59 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, 2025 to December 31, 2025).

2.3 Management of Facility-Related Emissions and Costs

27. 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,²³

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"²⁴

this section of evidence contains details on the potential options for reducing Enbridge Gas's facility-related emissions and associated costs. 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 associated costs, through the use of lower cost compliance options.

²³ EB-2020-0212, EGI 2021 FCPP Application, September 30, 2020, Exhibit A, p.14.

²⁴ EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.

Facility-Related Emission Reduction Projects

28. 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 combustion of fuels in Company-operated buildings, equipment and vehicles, and methane emissions from venting and leaked natural gas.
29. 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 Phase 1 Rebasing Application.²⁵
30. Opportunities identified to date with the potential to reduce EPS volumes are listed below in Table 2, Table 3, and Table 4. Table 2 provides a summary of the opportunities that Enbridge Gas is implementing to reduce emissions and facility-related costs. Table 3 summarizes potential opportunities to reduce emissions and facility-related costs that Enbridge Gas has identified but are not currently implementing due to technical and/or economic constraints. Table 4 includes opportunities that are being reviewed as potential projects that could be eligible for funding under the MECP's Emissions Performance Program (EPP).
31. 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_{2e} figure and savings represented by a negative \$/tCO_{2e} figure). Cash outflows include incremental capital costs of each opportunity. Cash inflows

²⁵ EB-2022-0200, Exhibit 1, Tab 10, Schedule 8, Table 1 & Table 2; and Decision on Settlement Proposal, August 17, 2023, Schedule A (Partial Settlement Agreement), p.37.

include resulting natural gas savings, avoided carbon charges, any other incremental operations and maintenance (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_{2e}.

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

Opportunity	Total Estimated Capital Cost (\$millions)	Estimated Emissions Reductions – 2023 (tCO _{2e})	Estimated EPS Cost Impact - 2023 (\$) ²⁶	Forecasted Emissions Reductions – 2025 (tCO _{2e})	Forecasted Annual Project Emissions Reductions (tCO _{2e} /yr) ²⁷	Cost per Tonne of GHG Emissions (\$/tCO _{2e})
1 Storage and Transmission Operations (STO) Online Monitoring	0.05	490	-32,000	1,100 ²⁸	1,100	-32
2 Air Filter Replacements for Turbines	0 ²⁹	60	-3,900	230	1,500	-47

32. Implementation of the first phase of the STO online monitoring opportunity was completed in 2022. Enbridge Gas continues to assess a second phase of this opportunity, where older model compressor units may be brought online to optimize engine use.

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

²⁶ Estimated based on estimated emissions reductions and excess emissions charge for 2023.

²⁷ Forecasted total annual project emissions reductions once project is fully implemented.

²⁸ 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.

²⁹ Initial O&M costs for the air filter replacement program are estimated to be \$10,000. Once the program is fully implemented, it is estimated that there will be an O&M savings of approximately \$150,000/year.

34. 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 – Potential Opportunities

Opportunity		Total Estimated Capital Cost (\$millions)	Forecasted Annual Project Emissions Reductions (tCO ₂ e/yr) ³⁰	Cost per Tonne of GHG Emissions (\$/tCO ₂ e)
1	Electric Drive Compressors – Dawn Plant C Replacement	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 ³¹	275,000	178
5	Own Use Gas Fuel Switch to RNG Blend (5%)	0 ³²	1,300	203

35. The Compression Modernization Strategy in the Company's asset management plan is a long-term plan to replace identified compression units. 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

³⁰ Forecasted total annual project emissions reductions once project is fully implemented.

³¹ It is estimated that the incremental O&M costs will be approximately \$151 million/year once fully implemented.

³² It is estimated that the incremental O&M costs will be approximately \$0.7 million/year once fully implemented.

compressor fleet is expected to reduce the regulated utility's EPS emissions in the long-term.

36. 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 previously identified opportunities.

37. 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.

Emissions Performance Program

38. The EPP was introduced by the MECP in June 2024 and uses compliance payments collected through the EPS to support Scope 1 and Scope 2 GHG emissions reductions at non-electricity generating facilities registered in the EPS program.³³

39. Each year, the MECP will notify eligible EPS facilities of their notional funding allocation which will be equivalent to the EPS facility's compliance payment made to the MECP in the previous year. To access the notional funding, an EPS facility must submit a project proposal and receive approval from the MECP that the project meets the required funding eligibility criteria.

40. As EPP funding is equal to a facility's compliance payment made to the MECP in the previous year, if an EPS facility purchases EPU's from another EPS entity and then

³³ Ontario Government, Available funding opportunities from the Ontario Government, Emissions Performance Program. September 4, 2024. <https://www.ontario.ca/page/available-funding-opportunities-ontario-government#section-5>.

retires the EPU for use towards their compliance obligation, the corresponding compliance payment to the MECP could be eliminated or decreased. Therefore, by utilizing EPUs for an EPS compliance obligation, an EPS facility forfeits or reduces the available EPP funding that the MECP would offer the following year.

41. In June 2024, Enbridge Gas was notified by the MECP of a notional allocation of funding up to \$2,581,700 to be used to support eligible projects.
42. Opportunities that are identified as being potentially eligible projects for EPP funding are listed in Table 4. These opportunities were identified based on the EPP application requirements. The costs and emissions reductions provided in Table 4 are estimates, but will be updated as part of the project refinement. The MECP will review and consider the submitted applications for approval of the EPP funding. This is an ongoing process, and the MECP does not have a set timeline for approval.
43. Re-wheeling for Parkway A and electrification of the Heritage compressor are potentially feasible for EPP funding, pending project refinement and discussions with the MECP. EPP funding could enable these opportunities to progress in development.

Table 4
Facility-Related Emission Reduction Project Summary – Under Evaluation for EPP funding

Opportunity		Total Estimated Capital Cost (\$millions) ³⁴	Estimated Absolute Project Emissions Reductions (tCO ₂ e/year) ³⁵
1	Electric Drive Compressors - Heritage	2.5	200
2	Re-wheeling Parkway A Turbine	2.3	750

³⁴ Preliminary estimate to be refined.

³⁵ Preliminary estimate to be refined.

44. The Heritage compressor station was identified as a good candidate for electrification as the scope of the project aligns with the potentially available EPP funding amounts and availability of electricity at this location.
45. The re-wheeling turbines opportunity included in Table 3 includes a plan for multiple turbines. By limiting the scope to the Parkway A turbine, the project can potentially be eligible for the EPP funding amount.

Initiatives to Reduce Facility-Related Emissions and Costs under the FCPP

46. In addition to the above identified in-progress and potential projects to reduce facility-related emissions, Enbridge Gas continues to assess the availability and use of hydrogen, RNG, and carbon capture and storage (CCS) to lower emissions and the associated costs under the FCPP at the Company's facilities.
47. In 2024, Enbridge Gas began operating a combined heat and power (CHP) unit that can utilize hydrogen and/or natural gas at the Company's Training and Operations Center (TOC) building in Markham, Ontario to study its impact on emissions reductions at that location, and to reduce electrical grid demands.
48. The regulatory and commercial framework for CCS in Ontario continues to evolve. Enbridge Gas will continue to monitor developments in carbon capture technology and the readiness of the carbon storage reservoirs in Ontario, and assess the potential for CCS as an emissions reduction opportunity for the Company's facility-related emissions.

EPS Compliance Cost Reductions

49. Aside from paying the excess emissions charge, Enbridge Gas has an alternative compliance option to satisfy its annual EPS compliance obligation by purchasing EPU from other EPS participants. The EPS Regulation does not allow for the use of Offset Credits as a viable compliance option.

50. Although procurement of EPU's can reduce Enbridge Gas's EPS compliance costs, due to EPU's typically selling at a discount to the excess emissions charge, purchasing EPU's reduces the amount of funding available through the EPP in the following year as discussed above. As an example, procurement of EPU's in 2025 will reduce the amount of EPP funding available in 2026.
51. Since the implementation of the EPP in June 2024, Enbridge Gas has been working to identify GHG emissions reduction projects that would be eligible for EPP funding. The shortlist of eligible projects that have been identified are shown in Table 4 above. Due to the EPP recently being implemented, Enbridge Gas is still determining the right balance between procuring EPU's to reduce the Company's compliance costs, or paying the excess emissions charge in order to maximize the amount of EPP funding available.
52. Enbridge Gas is currently in discussion with other EPS entities about purchasing EPU's to use towards the Company's 2023 compliance obligation, which is due by December 15, 2024. Enbridge Gas will compare the availability and pricing of any potential EPU's with the benefit of paying the excess emissions charge and securing EPP funding the following year, when determining which compliance option to pursue to satisfy the 2023 EPS compliance obligation. If Enbridge Gas is able to procure EPU's at a lower price than the excess emissions charge in the time period between the submission of this Application and the 2023 compliance deadline of December 15, 2024, the cost savings will be recorded in the FCCVA.³⁶

³⁶ EB-2019-0247, Exhibit I.STAFF.8 parts b) and c), June 18, 2020 and EB-2019-0247, Enbridge Gas Reply Argument, July 16, 2020, p.12.

2.4 Management of Customer-Related Emissions and Costs

53. Enbridge Gas currently provides and has proposed several initiatives that assist customers in reducing their natural gas usage, thus reducing their Federal Carbon Charge Costs. This includes the following:

- i. Enbridge Gas's OptUp program is a voluntary RNG pilot program, which was approved by the OEB and implemented in April 2021.³⁷ This program allows customers to voluntarily pay an additional \$2 per month towards the inclusion of RNG in the gas supply portfolio. The program was proposed and approved as a pilot to provide an opportunity to begin incorporating RNG into the gas supply commodity portfolio. Since implementing the program, Enbridge Gas has procured approximately 143,000 m³ of RNG. This RNG procurement resulted in avoided Federal Carbon Charges of approximately \$15,000 (\$2,000 in 2022, \$5,700 in 2023 and \$7,300 in 2024 to date) and a reduction of approximately 275 tCO₂e (49 tCO₂ in 2022, 113 tCO₂ in 2023 and 113 tCO₂ in 2024 to date) from the displacement of natural gas on an end-use basis.
- ii. In April 2024, Enbridge Gas submitted Phase 2 of the 2024 Rebasing Application which includes a proposal to procure low carbon energy, with a focus on RNG, as part of the gas supply commodity portfolio beginning in 2026.³⁸ The program would seek to procure up to 1% (5.3 PJ) of Enbridge Gas's supply as RNG in 2026, increasing 1% annually to 4% (21.1 PJ) in 2029. If approved and implemented as proposed in the Phase 2 Rebasing Application, in 2026, the RNG procured through this program could reduce Federal Carbon Charges by approximately \$28 million and reduce GHG emissions by 0.26 MtCO₂e. If approved by the OEB, this program will replace the existing voluntary RNG pilot program.

³⁷ EB-2020-0066, Decision and Order, September 24, 2020.

³⁸ EB-2024-0111, Exhibit 4, Tab 2, Schedule 7.

- iii. Phase 1 of Enbridge Gas's Low-Carbon Energy Project (LCEP) began blending hydrogen into the natural gas distribution system in October 2021.³⁹ Since implementation in 2021, over 333,000 m³ of hydrogen has been distributed to customers, reducing GHG emissions by approximately 210 tCO₂e from the displacement of natural gas on an end-use basis. Of this volume of hydrogen, about 215,000 m³ has been distributed since August 2022, which is when hydrogen became recognized as exempt from the Federal Carbon Charge.⁴⁰ The avoided Federal Carbon Charges from the distribution of hydrogen is approximately \$26,000 (\$2,500 in 2022, \$14,800 in 2023 and \$8,700 in 2024 to date).
- iv. In its 2024 Rebasing Application, Enbridge Gas proposed to undertake a Hydrogen Blending Grid Study to evaluate the hydrogen-readiness of all aspects of Ontario's natural gas grid to accept greater amounts of hydrogen which would enable further emission reductions and prepare for the future of hydrogen blending in the province.⁴¹ The Hydrogen Blending Grid Study was initiated in 2023 and will be completed in 2026.⁴²
- v. Enbridge Gas's DSM program aims to facilitate energy efficiency in Ontario through the implementation of energy efficiency and conservation measures to reduce gas demand from the Company's residential, low income, commercial, industrial, and large volume customers.⁴³ In 2023, Enbridge Gas's DSM programs resulted in total net cumulative natural gas savings of

³⁹ EB-2019-0294.

⁴⁰ 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>.

⁴¹ EB-2022-0200, Exhibit 4, Tab 2, Schedule 6, pp.16-18.

⁴² EB-2024-0111, Exhibit I.1.1-ED-57.

⁴³ The customer-related volume forecasts in Exhibit B already incorporate reductions in natural gas due to DSM programs.

- 1,522.7 million m³ and reduced customers' net GHG emissions due to natural gas conservation by 2.94 million tCO_{2e}.⁴⁴
- vi. Enbridge Gas has made consistent efforts to advance technology innovation over the years through technology studies, field trials, and pilot projects that can help customers use natural gas more efficiently, such as distributed energy resources, hybrid heating, gas heat pumps, and carbon capture and utilization. For a detailed list of technology innovation projects and outcomes that Enbridge Gas led from 2017-2023, please see EB-2024-0111, Exhibit I.1.10-PP-8, Attachment 1.
 - vii. Enbridge Gas's Natural Gas Vehicle (NGV) Program has been operating within the EGD rate zone since the mid-1980s. The current NGV Program encourages the growth and development of natural gas as a substitute for gasoline and diesel fuel in transportation markets, and coordinates natural gas supply for public and private refueling stations. Participating in the NGV Program and switching from a fuel source such as diesel to natural gas in the transportation sector could reduce a customers' Federal Carbon Charge costs and end-use GHG emissions. For more information on Enbridge Gas's NGV Program, please see EB-2022-0200 Exhibit 1, Tab 14, Schedule 2.

3. Bill Impacts

54. The bill impact of the 2025 carbon charges for a typical residential customer with annual consumption of 2,400 m³ is \$435.05 per year in the EGD rate zone, which is an increase of \$68.71 per year over 2024. The bill impact of the 2025 carbon charges for a typical residential customer with annual consumption of 2,200 m³ is \$398.80 per year in the Union rate zones, which is an increase of \$62.98 per year over 2024.

⁴⁴ EB-2024-0111, Exhibit I.4.2-ED-48, part c). The 2023 DSM results are unaudited and subject to OEB approval. The GHG emissions calculation assumes 1.932kg of CO_{2e} are emitted for each m³ gas consumed.

55. The bill impact of the proposed 2023 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,400 m³ is \$2.13 in the EGD rate zone. The bill impact of the proposed 2023 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,200 m³ is \$1.12 in the Union North rate zone and \$0.85 in the Union South rate zone.

4. Requested Approvals

56. As the costs to comply with the GGPPA and EPS Regulation in 2025 form part of Enbridge Gas's ongoing operating costs as a utility, and consistent with Enbridge Gas's 2024 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).

57. Through this Application and by February 6, 2025, Enbridge Gas is seeking:

- a) OEB approval of rates to be applied to customer bills beginning April 1, 2025. Following the issuance of the OEB's Decision and Order for this Application, Enbridge Gas intends to reflect 2025 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, 2025 QRAM application.
- b) OEB approval to dispose of the 2023 balances recorded in Enbridge Gas's FCPP-related deferral and variance accounts, excluding the CCCVAs, effective April 1, 2025. 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, 2025 QRAM.⁴⁵

⁴⁵ 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 2019.¹ The analysis below compares the average use trend for residential and non-residential customers pre and post-Federal Carbon Charge implementation.
2. As of 2023, Enbridge Gas served over 3.9 million customers comprising of approximately 3.6 million residential and approximately 300 thousand non-residential customers.

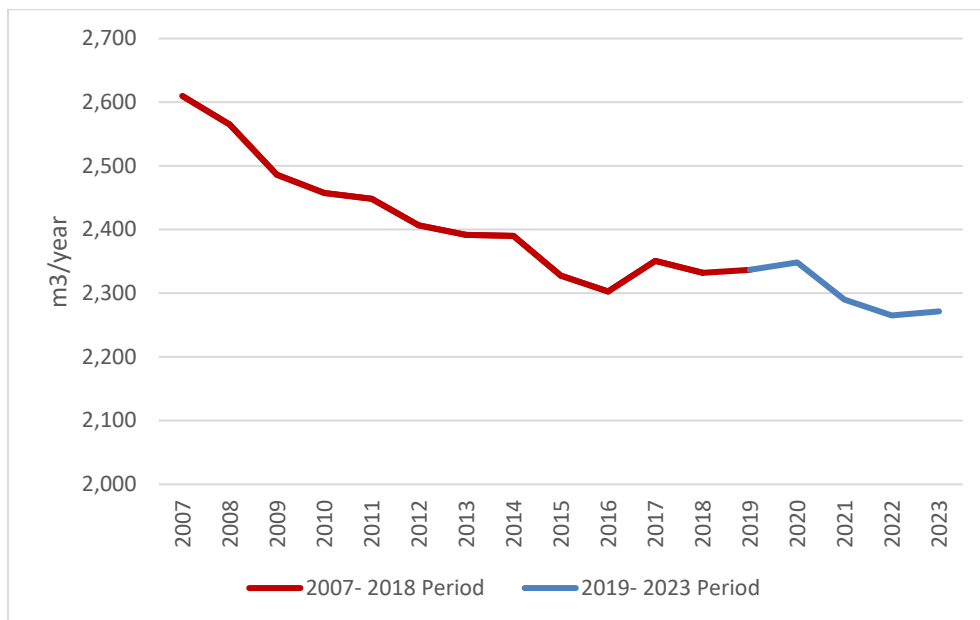
1. Residential Average Use

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 shows a general downward trend in Enbridge Gas's residential average use since 2007. The average annual decline in residential average use was approximately 1.0% between 2007 and 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 0.7% in average use, which is aligned with the historical trend experienced for the pre-2019 period. Therefore, the introduction of the Federal Carbon Charge in 2019 has not (to

¹ EB-2022-0194, Decision and Order, February 9, 2023, p.7.

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 Use²



- 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

- 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

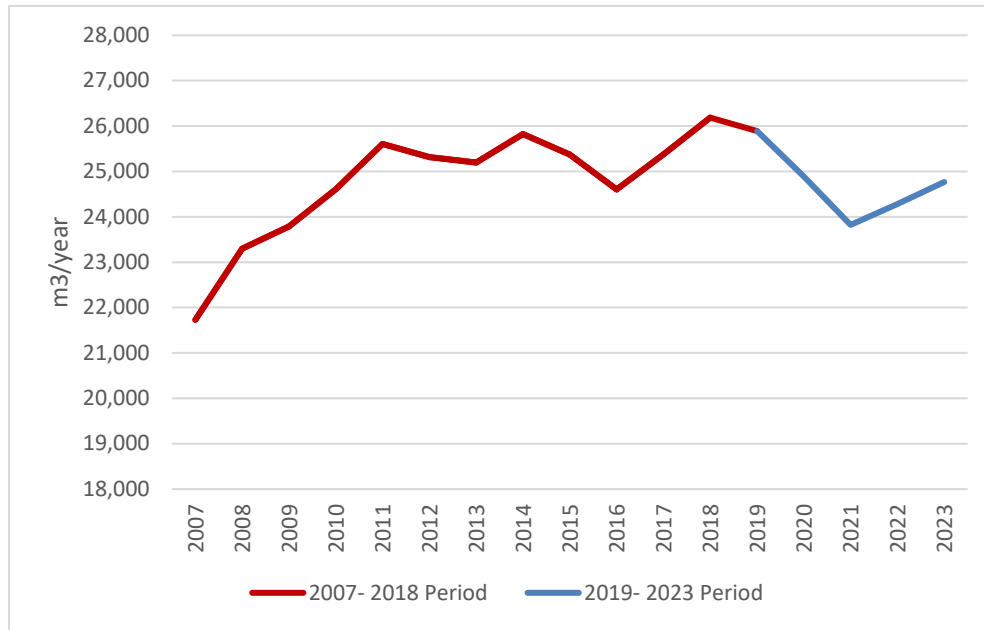
² Weather Normalized at 2025 Proposed Heating Degree Days.

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.”³ 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 shows a general trend in Enbridge Gas’s non-residential average use since 2007. 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 2019-2023, after the implementation of the Federal Carbon Charge in 2019, Enbridge Gas exhibited an average annual decline of 1.1% 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 2019-2023 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).

³ 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 Use⁴



9. Considering the Federal Carbon Charge will continue to increase in the future, absent a change in government policy, 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.

⁴ Weather Normalized at 2025 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.¹
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, 2025, to March 31, 2026; and
 - For volumes subject to the EPS (including facility-related volumes) – January 1, 2025 to December 31, 2025.
4. Natural gas volumes delivered by Enbridge Gas for the period of January 1, 2025 to March 31, 2025, will continue to be charged the Federal Carbon Charge and Facility Carbon Charge rates approved by the OEB as part of Enbridge Gas's 2024 Application.

2. Forecast 2025 Total Volume and Carbon Cost

5. Enbridge Gas's total 2025 regulated volume forecast subject to the GGPPA and the EPS is 17,136,962 10³m³.² This results in an associated forecast 2025 total cost of

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

² 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.

\$3,084.32 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 2025 Customer Volume and Federal Carbon Charge Cost

6. Enbridge Gas's total 2025 Customer Volume forecast subject to the Federal Carbon Charge is 16,981,671 10³m³ for the period of April 1, 2025, to March 31, 2026.³ This results in an associated forecast 2025 Federal Carbon Charge cost of \$3,075.38 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,⁴ volumes of renewable natural gas (RNG),⁵ volumes of hydrogen,⁶ and volumes of EPS registered customer facilities with emissions exceeding 10 ktCO₂e.⁷ 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.⁸

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

⁴ 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.

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

⁶ 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>.

⁷ The 2025 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.

⁸ 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.⁹ 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.

⁹ 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 2024 were assumed to continue in 2025.
13. Volumes of RNG in OptUp were incorporated into the 2025 Customer-Related Volume forecasts based on the forecast provided in Exhibit C, Tab 2, Schedule 3 of the Voluntary Renewable Natural Gas Program Application.¹⁰
14. In April 2024, Enbridge Gas submitted Phase 2 of the 2024 Rebasing Application which includes a proposal to procure up to 1% of the gas supply commodity portfolio as RNG, beginning in 2026.¹¹ As this proposal has not yet received OEB approval, RNG volumes related to this proposal have not been included in the 2025 Customer Volume forecasts.
15. 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, when the federal government first released a legislative proposal exempting hydrogen from the Federal Carbon Charge.¹² This applies to volumes of hydrogen injected as part of the Low Carbon

¹⁰ EB-2020-0066.

¹¹ EB-2024-0111, Phase 2 Rebasing Application, April 26, 2024, Exhibit 4, Tab 2, Schedule 7.

¹² 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

Energy Project (LCEP), Enbridge Gas's low-carbon hydrogen blending project in Markham, Ontario.

16. Enbridge Gas has incorporated forecasted quantities of blended hydrogen into the 2025 Customer-Related Volume forecast based on the estimated quantities provided by Enbridge Gas in the response to Exhibit I.H2GO.2 of the Low Carbon Energy Project Application.¹³

4. Forecast 2025 Facility Volume and Facility Carbon Charge Cost

17. Enbridge Gas's total 2025 regulated Facility Volume forecast is 155,291 10³m³.¹⁴ This results in an associated forecast 2025 Facility Carbon Charge cost of \$8.94 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, 2025 to March 31, 2026; and, (ii) transmission and storage compression volumes (which are subject to the EPS as Enbridge Gas's transmission and storage system is an EPS Facility under the EPS Regulation) for the period of January 1, 2025 to December 31, 2025. The parameters underpinning Enbridge Gas's estimated EPS compliance obligation can be found at Exhibit B, Tab 1, Schedule 1, Appendix A. The forecast 2025 Facility Volume and associated Facility Carbon Charge cost estimate are subject to change based on actual Facility Volumes.

(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>.

¹³ EB-2019-0294.

¹⁴ 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

- 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.¹ Enbridge Gas's storage and transmissions system is considered an EPS Facility under the EPS Regulation. On September 1, 2021, the federal government published an *Order Amending Part 2 of Schedule 1 to the Greenhouse Gas Pollution Pricing Act* in the *Canada Gazette*, Part II, which removed Ontario from Part 2 of Schedule 1 of the GGPPA as of January 1, 2022.² Based on the EPS Regulation, the annual compliance obligation under EPS is calculated as follows:

Compliance Obligation (tCO₂e) =

Verification Amount – Total Annual Emissions Limit

Where:

Verification Amount (tCO₂e) =

Annual EPS Emissions³

Total Annual Emissions Limit (tCO₂e) =

BEI (tCO₂e/production units) × Annual SF (%) × Annual Production (production units)

- For forecasting purposes, the total annual emissions limit was based on the facility Baseline Emissions Intensity (BEI), along with the 2025 stringency factor (SF)⁴ for transmitting natural gas, following the facility specific Performance Standard (PS) calculation methodology, as outlined in the MECP's GHG Emissions Performance

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

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

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

⁴ MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, March 2024, Table 4.2 page 43. [https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEI_March%202024%20\(EN\)_1.pdf](https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEI_March%202024%20(EN)_1.pdf).

Standards and Methodology for the Determination of the Total Annual Emissions Limit, Formula 3.1.5-3.⁵

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

Energy (MWh)⁶ =

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 2025, Enbridge Gas has calculated the compressor energy use in MWh for 2021 to 2023 and used an average of this data. Enbridge Gas's detailed calculations of the 2025 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.

⁵ MECP: GHG Emissions Performance Standards and Methodology for the Determination of the Total Annual Emissions Limit, March 2024, p. 22. [https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEI_March%202024%20\(EN\)_1.pdf](https://prod-environmental-registry.s3.amazonaws.com/2024-04/GHG%20EPS%20and%20Methodology%20for%20determination%20of%20TAEI_March%202024%20(EN)_1.pdf).

⁶ 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 2025 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 2025 Volume and Carbon Cost
 2. Forecast 2025 Customer Volumes and Federal Carbon Charge Cost
 3. Forecast 2025 Facility Volumes and Facility Carbon Charge Cost
 - 3.1. Company Use Volumes
 - 3.2. EPS Volumes

1. Forecast 2025 Volume and Carbon Cost

3. The EGD rate zone 2025 regulated volume forecast subject to the GGPPA and EPS Regulation is 10,506,627 10^3m^3 .¹ This results in an associated forecast 2025 total carbon cost of \$1,901.15 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 2025 Customer Volumes and Federal Carbon Charge Cost

4. The EGD rate zone total 2025 Customer Volume forecast subject to the Federal Carbon Charge is 10,489,044 10^3m^3 as detailed at Exhibit B, Tab 2, Schedule 2. This results in an associated forecast 2025 Federal Carbon Charge cost of

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

\$1,899.57 million as detailed at Exhibit B, Tab 2, Schedule 6. Enbridge Gas has 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 2025 Facility Volumes and Facility Carbon Charge Cost

5. The EGD rate zone total 2025 regulated Facility Volume forecast is 17,583 10^3m^3 as detailed at Exhibit B, Tab 2, Schedule 3. This results in an associated forecast 2025 Facility Carbon Charge cost of \$1.58 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 an EPS Facility under the EPS Regulation). The forecast 2025 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 2025 including distribution buildings, boilers/line heaters, and NGV fleet volumes for the EGD rate zone is 4,303 10^3m^3 as detailed at Exhibit B, Tab 2, Schedule 3.² This results in an associated forecast 2025 Facility Carbon Charge cost of \$0.78 million as detailed at Exhibit B, Tab 2, Schedule 6.

² Enbridge Gas's buildings, boiler/line heater and NGV fuel volume forecast for the EGD rate zone is based on a three-year average of consumption by location.

3.2 EPS Volumes

7. The EPS Volume forecast for 2025 for the EGD rate zone is 14,784 10³m³ as detailed at Exhibit B, Tab 2, Schedule 3.³ The corresponding forecast 2025 EPS obligation of 9,392 tCO₂e results in a Facility Carbon Charge cost of \$0.89 million as detailed at Exhibit B, Tab 2, Schedules 5 and 6. Of the \$0.89 million, \$0.80 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 2025 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.

³ This includes both utility (regulated) and non-utility (unregulated) volumes.

Enbridge Gas Inc.
EGD Rate Zone
2025 Customer-Related Volumes by Rate Class (April 2025 to March 2026)
(10³m³)

Line No.	Rate Class	Col. 1	Col. 2	Col. 3
		Forecast Volumes ¹	EPS Participant & Other Exempt Volumes ²	(Col. 1 - Col. 2) Net Volumes
1	1	5,055,608	1,043	5,054,565
2	6	4,658,867	106,475	4,552,392
3	9	-	-	-
4	100	53,972	19,714	34,258
5	110	1,267,962	527,192	740,770
6	115	365,873	363,834	2,038
7	125 ³	1,042,065	1,042,065	-
8	135	62,123	4,445	57,678
9	145	26,147	15,084	11,063
10	170	251,363	215,084	36,279
11	200 ⁴	188,372	188,372	-
12	300	-	-	-
13	Total Customer-Related	12,972,354	2,483,310	10,489,044

Notes:

- (1) Forecast Volumes after DSM from April 1, 2025 to March 31, 2026.
- (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 5 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
2025 Facility-Related Volumes
(10³m³)

Line No.	Particulars	Col. 1	Col. 2	Col.3 (Col. 1 + Col.2)
		Utility Forecast Amount (regulated)	Non-Utility Forecast Amount (unregulated)	Total 2025 Forecast
1	Company Use - Buildings	572	-	572
2	Company Use - Boilers/Line Heaters	3,312	-	3,312
3	Company Use - NGV Fleet	419	-	419
4	Total Company Use ¹	4,303	-	4,303
5	Compressor Fuel ²	13,280	1,504	14,784
6	Total Facility-Related	17,583	1,504	19,087

Notes:

(1) Forecast Company-Use volumes for April 1, 2025 to March 31, 2026.

(2) Forecast Compressor Fuel for January 1 to December 31, 2025.

Enbridge Gas Inc.
EGD Rate Zone

Table 1
2025 Forecast Compressor Emissions

Line No.	Particulars	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
		Volumes ¹ (10 ³ m ³)	CO ₂ Emissions ² (Tonnes CO ₂)	CH ₄ Emissions ³ (Tonnes CH ₄)	N ₂ O Emissions ⁴ (Tonnes N ₂ O)	CO ₂ e Emissions ⁵ (Tonnes CO ₂ e)
1	Compressor Fuel & Transmission Ancillary Fuel	14,784	29,116	29	1	30,124

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 2023", 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 ₂ Emission Factor	CH ₄ Emission Factor ¹	N ₂ O Emission Factor ¹
1	Natural Gas Pipelines	Tonne/GJ		0.00005	0.000013
2	Heat Value ²	GJ/10 ³ m ³	39.08	39.08	39.08

Notes:

- (1) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2023", Table 2-5.
(2) Assumed Budget Heat Value = 39.08 GJ/10³m³. In calculating actual emissions, actual heating value will be used.

Table 3
Conversion Factors

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

Notes:

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

Enbridge Gas Inc.
EGD Rate Zone
2025 Forecast EPS Obligation

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6
Line No.	2025 Forecast Compressor Emissions ¹ (tCO ₂ e)	2021 - 2023 EGI Average Emission Intensity (tCO ₂ e/MWh)	2025 Forecast Production ² (MWh)	Facility Specific Performance Standard ³ (tCO ₂ e/MWh)	Total Annual Emissions Limit ⁴ (tCO ₂ e)	EPS Compliance Obligation ⁵ (tCO ₂ e)
1	30,124	0.63	47,914	0.43	20,731	9,392

Notes:

(1) Exhibit B, Tab 2, 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 – March 2024, Formula 3.1.5-3.

(4) Col. 3 x Col. 4.

(5) Col. 1 - Col. 5.

Enbridge Gas Inc.
EGD Rate Zone
2025 Summary of Customer-Related and Facility-Related Costs

Line No.	Particulars	2025 Forecast
<u>Customer-Related Cost Forecast</u>		
1	Customer-related Forecast Volume (10^3m^3) ⁽¹⁾	10,489,044
2	Federal Carbon Charge (\$/m ³) ⁽²⁾	0.1811
3	<u>Total Customer-Related Costs (\$)</u>	<u>1,899,565,854</u>
<u>Facility-Related Cost Forecast</u>		
4	Company-Use Forecast Volume (10^3m^3) ⁽³⁾	4,303
5	Federal Carbon Charge (\$/m ³) ⁽²⁾	0.1811
6	<u>Company Use Costs (\$)</u>	<u>779,245</u>
7	EPS Obligation (tCO ₂ e) ⁽⁴⁾	9,392
8	Excess Emissions Charge (\$/tCO ₂ e) ⁽⁵⁾	95.00
9	<u>Compressor Fuel Use Costs (\$)</u>	<u>892,256</u>
10	<u>Compressor Fuel Use Costs - Unregulated (\$)</u> ⁽⁶⁾	<u>(90,767)</u>
11	<u>Compressor Fuel Use Costs - Regulated (\$)</u>	<u>801,489</u>
12	<u>Total Facility Related Costs (\$)</u>	<u>1,580,734</u>
13	<u>Total Cost Forecast (\$)</u>	<u>1,901,146,588</u>

Notes:

(1) Exhibit B, Tab 2, Schedule 2. Forecast volumes from April 1, 2025 to March 31, 2026.

(2) Exhibit A, Table 1.

(3) Exhibit B, Tab 2, Schedule 3, Column 1, Line 4. Forecast volumes from April 1, 2025 to March 31, 2026.

(4) Exhibit B, Tab 2, Schedule 5. Forecast from January 1 to December 31, 2025.

(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 2025 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 2025 Volume and Carbon Cost
 2. Forecast 2025 Customer Volumes and Federal Carbon Charge Cost
 3. Forecast 2025 Facility Volumes and Facility Carbon Charge Cost
 - 3.1. Company Use Volumes
 - 3.2. EPS Volumes

1. Forecast 2025 Volume and Carbon Cost

3. The Union rate zones 2025 regulated volume forecast subject to the GGPPA and EPS Regulation is 6,630,335 10³m³.¹ This results in an associated forecast 2025 total carbon cost of \$1,183.18 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 2025 Customer Volumes and Federal Carbon Charge Cost

4. The Union rate zones total 2025 Customer Volume forecast subject to the Federal Carbon Charge is 6,492,627 10³m³ as detailed at Exhibit B, Tab 3, Schedule 2. This results in an associated forecast 2025 Federal Carbon Charge cost of \$1,175.81 million as detailed at Exhibit B, Tab 3, Schedule 6. Enbridge Gas has included

¹ 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 2025 Facility Volumes and Facility Carbon Charge Cost

5. The Union rate zones total 2025 regulated Facility Volume forecast is 137,708 10^3m^3 as detailed at Exhibit B, Tab 3, Schedule 3. This results in an associated forecast 2025 Facility Carbon Charge cost of \$7.36 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 an EPS Facility under the EPS Regulation). The forecast 2025 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 2025 including distribution buildings, boilers/line heaters and NGV fleet volumes for the Union rate zones is 9,761 10^3m^3 as detailed at Exhibit B, Tab 3, Schedule 3.² This results in an associated forecast 2025 Facility Carbon Charge cost of \$1.77 million as detailed at Exhibit B, Tab 3, Schedule 6.³

² Enbridge Gas's buildings, boiler/line heater and NGV fuel volume forecast for the Union rate zones is based on a three-year average of consumption by location.

³ Included in the Company Use Volume forecast for 2025 is 34 10^3m^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 \$6,000.

3.2 EPS Volumes

7. The EPS Volume forecast for 2025 for the Union rate zones is 138,852 10³m³ as detailed at Exhibit B, Tab 3, Schedule 3.⁴ The corresponding forecast 2025 EPS obligation of 63,901 tCO₂e results in a Facility Carbon Charge cost of \$6.07 million as detailed at Exhibit B, Tab 3, Schedules 5 and 6. Of the \$6.07 million, \$5.59 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.⁵
9. Enbridge Gas's detailed calculations of the 2025 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.

⁴ This includes both utility (regulated) and non-utility (unregulated) volumes.

⁵ 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
2025 Customer-Related Volumes by Rate Class (April 2025 to March 2026)
(10³m³)

Line No.	Rate Class	Col. 1	Col. 2	Col. 3
		Forecast Volumes ¹	EPS Participant & Other Exempt Volumes ²	(Col. 1 - Col. 2) Net Volumes
1	1	1,013,413	269	1,013,143
2	10	318,344	9,212	309,132
3	M1	3,220,995	2,156	3,218,839
4	M2	1,232,396	94,918	1,137,477
5	20	991,428	893,817	97,610
6	25	190,423	178,399	12,024
7	100	927,064	927,064	-
8	M4	585,465	247,538	337,928
9	M5	58,417	12,743	45,674
10	M7	810,074	636,246	173,828
11	M9 ³	98,223	98,223	-
12	M10 ³	-	-	-
13	T1	407,282	329,596	77,686
14	T2	5,118,431	5,049,146	69,285
15	T3 ³	255,661	255,661	-
Total				
16	Customer-Related	15,227,617	8,734,990	6,492,627

Notes:

(1) Forecast Volumes after DSM from April 1, 2025 to March 31, 2026.

(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 5 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
2025 Facility-Related Volumes
(10³m³)

Line No.	Particulars	Col. 1	Col. 2	Col.3 (Col. 1 + Col.2)
		Utility Forecast Amount (regulated)	Non-Utility Forecast Amount (unregulated)	Total 2025 Forecast
1	Company Use - Buildings	1,941	34	1,975
2	Company Use - Boilers/Line Heaters	7,786	-	7,786
3	Company Use - NGV Fleet	33	-	33
4	Total Company Use ¹	9,761	34	9,795
5	Compressor Fuel ²	127,948	10,904	138,852
6	Total Facility-Related	137,708	10,938	148,647

Notes:

(1) Forecast Company-Use volumes for April 1, 2025 to March 31, 2026.

(2) Forecast Compressor Fuel for January 1 to December 31, 2025.

Enbridge Gas Inc.
Union Rate Zone

Table 1
2025 Forecast Compressor Emissions

Line No.	Particulars	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
		Volumes ¹ (10 ³ m ³)	CO ₂ Emissions ² (Tonnes CO ₂)	CH ₄ Emissions ³ (Tonnes CH ₄)	N ₂ O Emissions ⁴ (Tonnes N ₂ O)	CO ₂ e Emissions ⁵ (Tonnes CO ₂ e)
1	Compressor Fuel & Transmission Ancillary Fuel	138,852	273,454	271	7	282,921

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 2023", 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 ₂ Emission Factor	CH ₄ Emission Factor ¹	N ₂ O Emission Factor ¹
1	Natural Gas Pipelines	Tonne/GJ		0.00005	0.0000013
2	Heat Value ²	GJ/10 ³ m ³	39.08	39.08	39.08

Notes:

- (1) Environment and Climate Change Canada "Canada's Greenhouse Gas Quantification Requirements - December 2023", Table 2-5.
- (2) Assumed Budget Heat Value = 39.08 GJ/10³m³. In calculating actual emissions, actual heating value will be used.

Table 3
Conversion Factors

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

Notes:

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

Enbridge Gas Inc.
Union Rate Zone
2025 Forecast EPS Obligation

Line No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6
	2025 Forecast Compressor Emissions ¹	2021 - 2023 EGI Average Emission Intensity	2025 Forecast Production ²	Facility Specific Performance Standard ³	Total Annual Emissions Limit ⁴	EPS Compliance Obligation ⁵
	(tCO ₂ e)	(tCO ₂ e/MWh)	(MWh)	(tCO ₂ e/MWh)	(tCO ₂ e)	(tCO ₂ e)
1	282,921	0.56	506,194	0.43	219,020	63,901

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 – March 2024, Formula 3.1.5-3.

(4) Col. 3 x Col. 4.

(5) Col. 1 - Col. 5.

Enbridge Gas Inc.
Union Rate Zone

2025 Summary of Customer-Related and Facility-Related Costs

Line No.	Particulars	2025 Forecast
<u>Customer-Related Cost Forecast</u>		
1	Customer-related Forecast Volume (10 ³ m ³) ⁽¹⁾	6,492,627
2	Federal Carbon Charge (\$/m ³) ⁽²⁾	0.1811
3	<u>Total Customer-Related Costs (\$)</u>	<u>1,175,814,709</u>
<u>Facility-Related Cost Forecast</u>		
4	Company-Use Forecast Volume (10 ³ m ³) ⁽³⁾	9,761
5	Federal Carbon Charge (\$/m ³) ⁽²⁾	0.1811
6	<u>Company Use Costs (\$)</u>	<u>1,767,641</u>
7	EPS Obligation (tCO ₂ e) ⁽⁴⁾	63,901
8	Excess Emissions Charge (\$/tCO ₂ e) ⁽⁵⁾	95.00
9	<u>Compressor Fuel Use Costs (\$)</u>	<u>6,070,553</u>
10	<u>Compressor Fuel Use Costs - Unregulated (\$)</u> ⁽⁶⁾	<u>(476,719)</u>
11	<u>Compressor Fuel Use Costs - Regulated (\$)</u>	<u>5,593,833</u>
12	<u>Total Facility Related Costs (\$)</u>	<u>7,361,475</u>
13	<u>Total Cost Forecast (\$)</u>	<u>1,183,176,184</u>

Notes:

(1) Exhibit B, Tab 3, Schedule 2. Forecast volumes from April 1, 2025 to March 31, 2026.

(2) Exhibit A, Table A-1.

(3) Exhibit B, Tab 3, Schedule 3, Column 1, Line 4. Forecast volumes from April 1, 2025 to March 31, 2026.

(4) Exhibit B, Tab 3, Schedule 5. Forecast from January 1 to December 31, 2025.

(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 2023 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 2023 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. 2023 FCPP-Related Deferral and Variance Account Balances
 - 2.1. 2023 Administration Costs Recorded in the Greenhouse Gas Emissions Administration Deferral Account (GGEADA)
 - 2.2. 2023 Customer-Related Costs Recorded in the Customer Carbon Charge – Variance Account (CCCVA)
 - 2.3. 2023 Facility-Related Costs Recorded in the Facility Carbon Charge – Variance Account (FCCVA)
 3. Forecast 2025 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 Emissions Performance Standards (EPS) volumes associated with Enbridge Gas's own operations for each of the EGD rate zone and the Union rate zones (effective January 1, 2019).¹

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.²
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 EPS.³ 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. In its Decision and Order regarding the 2022 Application, the OEB approved the amendments to the wording of the FCPP deferral and variance accounting orders as filed.⁴
6. Accordingly, until December 31, 2023, Enbridge Gas's established FCPP-related deferral and variance accounts were:

¹ EB-2018-0205, Exhibit D, Tab 1, Schedule 1, pp.2-4.

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

³ EB-2021-0209, Exhibit C, p.3.

⁴ EB-2021-0209, OEB Decision and Order, February 10, 2022, p.10.

1. GGEADA – EGD Rate Zone;⁵
 2. GGEADA – Union Rate Zones;⁶
 3. CCCVA – EGD Rate Zone;⁷
 4. CCCVA – Union Rate Zones;⁸
 5. FCCVA – EGD Rate Zone;⁹ and
 6. FCCVA – Union Rate Zones.¹⁰
7. In its 2024 Phase 1 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.¹¹ As part of 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.¹² The OEB approved the harmonization and changes to the FCPP deferral and variances accounts in its Decision on the Settlement Proposal to Enbridge Gas’s 2024 Phase 1 Rebasing Application.¹³
8. Accordingly, effective January 1, 2024, Enbridge Gas’s harmonized FCPP-related deferral and variances accounts are:¹⁴

⁵ 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.

⁶ 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.

⁷ 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.

⁸ 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.

⁹ 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.

¹⁰ 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.

¹¹ EB-2022-0200, Exhibit 9, Tab 1, Schedule 1.

¹² EB-2022-0200, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp. 53-55.

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

¹⁴ EB-2022-0200, 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.;¹⁵
2. CCCVA – Enbridge Gas Inc.;¹⁶ and
3. FCCVA – Enbridge Gas Inc.¹⁷

3. 2023 FCPP-Related Deferral and Variance Account Balances

9. Enbridge Gas is seeking to dispose of: 2023 administration costs of \$7.40 million in the GGEADAs and 2023 facility-related costs of (\$5.41 million) in the FCCVAs.

3.1 2023 Administration Costs Recorded in the GGEADA

10. As set out in Table 1, Enbridge Gas's 2023 administration costs are \$7.40 million. A description of variances to Enbridge Gas's forecast 2023 administration costs follows:

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

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

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

Table 1
2023 Administration Costs (\$millions)

Line No.	Cost Element	2023 Forecasted Costs ¹⁸	2023 Actual Costs ¹⁹			Variance
			EGD Rate Zone	Union Rate Zones	Total	
1	IT Billing System	0.05	0.00	0.05	0.05	(0.00)
2	Staffing Resources	1.45	0.87	0.53	1.40	(0.05)
3	Consulting and External Legal Support	0.34	0.00	0.00	0.00 ²⁰	(0.34)
4	GHG Reporting and Verification	0.05	0.01	0.01	0.02	(0.03)
5	Bad Debt	5.16	3.24	2.01	5.26	0.09
6	Other Miscellaneous Costs	0.14	0.02	0.01	0.03	(0.11)
7	Interest ²¹	N/A	0.39	0.24	0.63	0.63
8	Total	7.20	4.54	2.86	7.40	0.20

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, 2023 to December 31, 2023.²² 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.

¹⁸ EB-2022-0194, , Exhibit C, p.10.

¹⁹ Composed of actual 2023 costs from January to December 2023.

²⁰ Actual consulting and external legal support costs are less than three thousand dollars.

²¹ Enbridge Gas did not include a 2023 forecast cost for interest.

²² Approximately 62% of customer consumption volumes were attributable to the EGD rate zone and 38% of customer consumption volumes were attributable to the Union rate zones.

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.²³ In 2021, the total cost related to these three administrative areas was \$1.49 million.²⁴

13. In Enbridge Gas's reply submission in the 2024 Application, in relation to administrative costs, Enbridge Gas noted that the focus should be on total administration costs within the GGEADAs regardless of the number of staffing resources, and that as long as total administration costs adhere to the OEB's direction from the 2023 Application, there should be no requirement to further restrict staffing resources.²⁵ In response, the OEB stated the following within the Decision and Order on Enbridge Gas's 2024 Application:

The OEB agrees with Enbridge Gas that, rather than a cap on staffing resources, the focus should be the total administration costs related to its Federal Carbon Pricing Program work. However, the OEB expects Enbridge Gas to continue to contain its total administration costs consistent with direction provided in the OEB's 2023 Federal Carbon Pricing Program Decision that indicated the OEB expected the then current level of administrative costs to be sufficient.²⁶

14. In accordance with the OEB's direction, in 2023, the administration costs in the three stipulated administrative areas totalled \$1.46 million,²⁷ reflecting a decrease of \$0.03 million below the approved 2021 administration costs included in the OEB's direction in the Decision and Order on the 2023 Application.

²³ EB-2022-0194, OEB Decision and Order, February 9, 2023, pp.9-10.

²⁴ EB-2022-0194, 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.

²⁵ EB-2023-0196, Reply Submission, January 22, 2024, p.3.

²⁶ EB-2023-0196, OEB Decision and Order, February 8, 2024, pp.7-8.

²⁷ Includes total 2023 costs from Staffing Resources, Consulting and External Legal Support, GHG Reporting and Verification, and Other Miscellaneous Costs from Table 1. Total may differ slightly due to rounding.

IT Billing System Costs

15. In its 2023 Application, Enbridge Gas forecast IT billing system costs of \$0.05 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.²⁸

16. The actual IT billing system costs for 2023 were \$0.05 million, all of which was related to the revenue requirement for the additional billing system modifications required for the Union rate zones.

Staffing Resources

17. In its 2023 Application, Enbridge Gas updated its 2023 staffing resources forecast to be \$1.45 million for salaries and wages, which included fully allocated costs for the 6.5 full time equivalents (FTEs) that comprised the Carbon Strategy team at that time, plus one additional FTE.²⁹

18. Actual salaries and wages costs incurred in 2023 were \$1.40 million for the 7.5 FTEs comprising the Carbon Strategy team throughout 2023. Actual staffing and wages costs were \$0.05 million lower than forecast due to variances between actual individual FTE wages and the average FTE wage used to estimate the forecasted staffing costs.

Consulting and External Legal Support

19. In its 2023 Application, Enbridge Gas forecast consulting and external legal support costs of \$0.34 million for 2023.³⁰ Actual consulting and external legal support costs incurred in 2023 were less than \$3,000. Consulting and external legal support costs were lower than forecast due to Enbridge Gas leveraging internal FTE resources where applicable, rather than engaging external consulting resources, and utilizing

²⁸ EB-2022-0194, Exhibit C, pp.10-11.

²⁹ EB-2022-0194, Exhibit C, pp.11-12.

³⁰ EB-2022-0194, Exhibit C, p.12.

the credit procurement work completed in 2021 for credit transactions completed in 2023.

GHG Reporting and Verification

20. In its 2023 Application, Enbridge Gas forecast costs of \$0.05 million for GHG reporting and verification of its 2022 EPS emissions, completed in 2023.³¹ Actual GHG reporting and verification costs incurred in 2023 were \$0.02 million, all of which were related to the verification of its 2022 EPS report by a third-party auditor as required under the EPS Regulations. GHG reporting and verification costs were lower than forecast due to the removal of Ontario from the federal OBPS, resulting in streamlined verification. Additionally, Enbridge Gas changed its third-party auditor in 2023 which resulted in a reduction to the verification costs.

Bad Debt

21. In its 2023 FCPP Application, Enbridge Gas forecast bad debt costs to be \$5.16 million in 2023.³² Actual bad debt costs incurred in 2023 were \$5.26 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 \$5.26 million represents total 2023 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

³¹ EB-2022-0194, Exhibit C, pp.12-13.

³² EB-2022-0194, Exhibit C, p.13.

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 2023 GGEADAs.

Other Miscellaneous Costs

24. In its 2023 Application, Enbridge Gas forecast 2023 other miscellaneous costs of \$0.14 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.³³ Actual other miscellaneous costs incurred in 2023 were \$0.03 million. Costs related to activities such as travel and conferences were lower due to many internal and external events proceeding virtually, 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 2023 costs related to customer communications.

3.2 2023 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 CCCVAs for each of the EGD rate zone and the Union rate zones. Enbridge Gas's customer-related obligation for January 1, 2023 to December 31, 2023 was \$1,777.61 million.

26. In Enbridge Gas's 2024 Application, the Company proposed to defer disposition of the balances within the 2022 CCCVAs due to the inability to generate a unit rate

³³ EB-2022-0194, Exhibit C, p.13.

from the minor balances.³⁴ The cumulative balance of the 2022 and 2023 CCCVAs, including interest, results in a total balance of (\$0.03 million); (\$26,878) for the EGD rate zone and (\$3,356) 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 2023, 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.³⁵
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 2023. Additionally, as hydrogen is only being distributed through the LCEP pilot project to a limited amount of customers, the hydrogen volumes eligible for exemption are small.

³⁴ EB-2023-0196, Exhibit C, pp. 9-10.

³⁵ EB-2020-0066, Decision and Order, September 24, 2020, pp.16-17.

30. The cumulative balance within the CCCVAs for 2022 and 2023 remain minor and, therefore, 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 will assess the cumulative balances within the CCCVAs next year and, if the balances are significant enough to generate a unit rate, Enbridge Gas will seek approval to dispose of the CCCVAs through the 2026 FCPP Application.

3.3 2023 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, 2023 to December 31, 2023. Enbridge Gas's 2023 facility-related obligation was \$3.99 million (\$1.78 million related to Company Use Volumes and \$2.21 million related to EPS Volumes), of which \$3.74 million is attributable to Enbridge Gas's regulated utility operations.

32. Enbridge Gas has recorded a 2023 facility-related variance of (\$5.41 million) in the FCCVAs, including (\$0.16 million) for the EGD rate zone and (\$5.26 million) for the Union rate zones.³⁶ 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. The FCCVAs variance includes \$0.03 million in cost savings related to the procurement of EPUs in November 2023, for use towards Enbridge Gas's 2022 EPS compliance obligation, as the 2022 FCCVAs balances were already finalized by the time the EPU transaction was completed.³⁷ Table 2 shows the variance related to the difference

³⁶ This variance reflects consideration of: (i) applying the Federal Carbon Charge Rate for Marketable Natural Gas of 9.79 ¢/m³ from January 1, 2023 – March 31, 2023 and 12.39 ¢/m³ from April 1, 2023 to December 31, 2023 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, 2023 to December 31, 2023; (ii) Enbridge Gas's 2023 EPS obligation of \$1.96 million related to regulated utility operations for the January 1, 2023 to December 31, 2023 period; (iii) actual billed amounts for the January 1, 2023 to December 31, 2023 period; (iv) \$0.03 million in cost savings related to EPU procurement for 2022 EPS obligation; and (v) interest of approximately \$(0.59) million.

³⁷ EB-2023-0196, Exhibit I.STAFF.2.

between 2023 forecast regulated facility-related volumes and actual regulated facility-related volumes for 2023.

Table 2³⁸
2023 Regulated Facility-Related Volumes/Emissions and Costs

	Updated 2023 Forecasted Volumes & Emissions	Updated 2023 Forecasted Costs (\$millions)	2023 Actual Volumes & Emissions	2023 Actual Costs (\$millions)	Variance (\$millions)
Company Use	18,673 10 ³ m ³	2.09	16,020 10 ³ m ³	1.77	(0.32)
EPS	78,805 tCO ₂ e ³⁹	5.12	30,221 tCO ₂ e ⁴⁰	1.96	(3.16)
Total	-	7.21	-	3.74	(3.48)

33. The main driver of the (\$3.48 million) variance is related to the difference between 2023 forecast regulated EPS emissions and actual regulated EPS emissions. EPS compressor fuel volumes and associated emissions were lower than forecast due to a mild winter and a modification in contracted transportation, which changed the activity along the Dawn to Parkway system, resulting in lower compressor fuel consumption. Additionally, the 2023 emissions intensity (tCO₂e/MWh) related to transmission and storage operations was lower than anticipated, resulting in lower EPS emissions and, therefore, a lower compliance obligation.

4. Forecast 2025 Administration Costs

34. In Enbridge Gas's 2024 Phase 1 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.⁴¹

³⁸ Only volumes/emissions and associated costs related to regulated utility operations are included.

³⁹ Represents regulated portion of Enbridge Gas's forecasted 2023 EPS compliance obligation.

⁴⁰ Represents regulated portion of Enbridge Gas's actual 2023 EPS compliance obligation.

⁴¹ EB-2022-0200, Exhibit 9, Tab 1, Schedule 2, p.25.

35. In the Settlement Proposal to Enbridge Gas's 2024 Phase 1 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.⁴² The OEB approved these account modifications, effective January 1, 2024, in its Decision on the Settlement Proposal.⁴³

36. Enbridge Gas has provided a forecast for the 2025 bad debt costs for informational purposes only and will seek recovery of its actual 2025 bad debt costs in a future proceeding.

Table 3
Forecast 2025 Bad Debt Costs

Cost Element	2025 Total Forecast Costs (\$millions)
Bad Debt	13.05

37. Enbridge Gas estimates that it will incur approximately \$13.05 million in incremental bad debt expenses in 2025 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 2025 forecast bad debt costs in Table 3, only actual bad debt related to the GGPPA and EPS Regulation will be recorded in the CCBDDA.

⁴² EB-2022-0200, Partial Settlement Proposal, June 28, 2023, Exhibit O1, Tab 1, Schedule 1, pp.53-55.

⁴³ EB-2022-0200, Decision on Settlement Proposal, August 17, 2023, p.1.

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, 2025, and to address the proposed allocation and disposition of Enbridge Gas's 2023 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 as early as April 1, 2025; and (ii) the allocation and disposition of the 2023 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, 2025.¹

2. This exhibit of evidence is organized as follows:
 1. 2025 FCPP-Related Unit Rates
 - 1.1 2025 Federal Carbon Charge
 - 1.2 2025 Facility Carbon Charge
 - 1.3 2025 Administration Costs
 - 1.4 Bill Impacts of Carbon Charges
 2. 2023 Deferral and Variance Account Balances
 - 2.1 2023 CCCVA
 - 2.2 2023 FCCVA
 - 2.3 2023 GGEADA
 - 2.4 Proposed Disposition of Deferral and Variance Account Balances
 - 2.5 Bill Impacts of Deferral and Variance Account Disposition

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

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

1. 2025 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.

1.1 2025 Federal Carbon Charge

5. Effective April 1, 2025, Enbridge Gas proposes to increase the Federal Carbon Charge from 15.2500 ¢/m³ (or \$80/tCO_{2e}) to 18.1100 ¢/m³ (or \$95/tCO_{2e}), as outlined in the GGPPA and set out at Exhibit A, Tab 2, Schedule 1, Table 1.²
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, in accordance with Part 1 of the GGPPA, 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.

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

7. Enbridge Gas will track the difference between the Federal Carbon Charge amount collected through rates and the actual costs incurred in the CCCVA.
8. The Federal Carbon Charge customer-related forecast volumes and costs by rate class for the April 1, 2025 to March 31, 2026 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 2025 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, 2025 to March 31, 2026 time period is \$8.94 million: \$1.58 million for the EGD rate zone and \$7.36 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 OEB in its Decision and Order for the Company's 2023 Application³, for implementation with Enbridge Gas's

³ EB-2022-0194 Decision and Order, February 9, 2023, pp.7- 8.

January 1, 2024 QRAM. Effective as early as April 1, 2025, Enbridge Gas is proposing to increase the common Facility Carbon Charge from 0.0143 ¢/m³ to 0.0172 ¢/m³. When expressed in \$/GJ, the Facility Carbon Charge remains unchanged at \$0.004/GJ. The derivation of the 2025 Facility Carbon Charge is detailed at Exhibit D, Tab 2, Schedule 1, page 2 and Exhibit D, Tab 3, Schedule 1, page 2.

12. Enbridge Gas will track the difference between the Facility Carbon Charge amount collected through rates and the actual costs incurred in the FCCVA.

1.3 2025 Administration Costs

13. Administration costs incurred in 2025 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 2025 carbon charges for a typical residential customer with an annual consumption of 2,400 m³ are \$435.05 per year, which is an increase of \$68.71 per year over 2024. Exhibit D, Tab 2, Schedule 2 details bill impacts for typical customers in the EGD rate zone.

15. For the Union rate zones, the 2025 carbon charges for a typical residential customer with an annual consumption of 2,200 m³ are \$398.80 per year, which is an increase of \$62.98 per year over 2024. Exhibit D, Tab 3, Schedule 2 details bill impacts for typical customers in the Union rate zones.

2. 2023 Deferral and Variance Account Balances

16. Enbridge Gas is requesting approval of the allocation and disposition of the 2023 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 of these accounts until the balances are larger. A description of 2023 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 2023 CCCVA

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

2.2 2023 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, 2023 to December 31, 2023. Unit rates for disposition are derived using actual volumes for the January 1, 2023 to December 31, 2023 time period. The methodology to derive the allocation and disposition unit rates is the same for the EGD and Union rate zones.

2.3 2023 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 2022 FCPP-related deferral and variance account balance.⁴ Unit rates for disposition are derived using actual volumes for the January 1, 2023 to December 31, 2023 time period. The methodology to derive the disposition unit rates is the same for the EGD and Union rate zones.

⁴ EB-2023-0196.

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 2023 FCPP-related deferral and variance account balances with the first QRAM application following the OEB's approval, as early as April 1, 2025. 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 m³ is \$2.13. Exhibit D, Tab 2, Schedule 5 details the customer bill impacts for typical customers in 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 m³ is \$1.12 for customers in the Union North rate zone and \$0.85 for customers in the Union South rate zone. Exhibit D, Tab 3, Schedule 5 details customer bill impacts for typical customers in the Union rate zones.

ENBRIDGE GAS INC.
EGD Rate Zone
2025 Customer-Related Volumes and Derivation of Federal Carbon Charge Unit Rate
Effective April 1, 2025

Line No.	Particulars	Forecast Volumes (10 ³ m ³) (1) (a)	Less: Transportation Volumes (10 ³ m ³) (b)	Customer-Related Forecast Volumes (10 ³ m ³) (2) (c) = (a - b)	EPS Participant & Other Exempt Volumes (10 ³ m ³) (3) (d)	Net Volumes (10 ³ m ³) (e) = (c - d)	Federal Carbon Charge (\$/m ³) (4) (f)	Federal Carbon Cost (\$) (g) = (e * f * 1000)	Federal Carbon Charge Unit Rate (cents/m ³) (h) = (g/(e*1000))*100
1	Rate 1	5,055,608	-	5,055,608	1,043	5,054,565	0.1811	915,381,787	
2	Rate 6	4,658,867	-	4,658,867	106,475	4,552,392	0.1811	824,438,156	
3	Rate 100	53,972	-	53,972	19,714	34,258	0.1811	6,204,144	
4	Rate 110	1,267,962	-	1,267,962	527,192	740,770	0.1811	134,153,444	
5	Rate 115	365,873	-	365,873	363,834	2,038	0.1811	369,147	
6	Rate 125	1,042,065	-	1,042,065	1,042,065	-	0.1811	-	
7	Rate 135	62,123	-	62,123	4,445	57,678	0.1811	10,445,519	
8	Rate 145	26,147	-	26,147	15,084	11,063	0.1811	2,003,511	
9	Rate 170	251,363	-	251,363	215,084	36,279	0.1811	6,570,145	
10	Rate 200	188,372	-	188,372	188,372	-	0.1811	-	
11	Rate 300	-	-	-	-	-	0.1811	-	
12	Rate 332	2,254,826	2,254,826	-	-	-	0.1811	-	
13	Total EGD Rate Zone	<u>15,227,180</u>	<u>2,254,826</u>	<u>12,972,354</u>	<u>2,483,310</u>	<u>10,489,044</u>		<u>1,899,565,854</u>	<u>18.1100</u>

Notes:

- (1) Exhibit B, Tab 2, Schedule 2, Col. 1 + Rate 332 forecast volume.
(2) Exhibit B, Tab 2, Schedule 2, Col. 1.
(3) Exhibit B, Tab 2, Schedule 2, Col. 2.
(4) Exhibit B, Tab 2, Schedule 6, Line 2.

ENBRIDGE GAS INC.
 EGD Rate Zone
 Derivation of 2025 Facility Carbon Charge
Effective April 1, 2025

Line No.	Particulars	Enbridge Gas Combined (a)
1	Total Facility Carbon Cost (\$000's) (1)	8,942
2	2024 Forecast Volumes (10 ³ m ³) (2)	51,856,157
3	Facility Carbon Charge (cents / m ³) (line 1 / line 2 * 100)	0.0172
4	Facility Carbon Charge (\$/GJ) (line 3 / Heat Value * 10) (3)	0.004

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 (a), Line 13 + Exhibit D, Tab 3, Schedule 1, Column (a), Line 24.
- (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 39.09 GJ/10³m³.

ENBRIDGE GAS INC.
EGD Rate Zone
2025 Carbon Charge Unit Rate Summary
Effective April 1, 2025

Line No.	Particulars	Unit Rate (cents/m ³) (a)
1	Federal Carbon Charge (1)	18.1100
2	Facility Carbon Charge (2)	0.0172
3	Total (line 1 + line 2)	<u>18.1272</u>

Notes:

- (1) Exhibit D, Tab 2, Schedule 1, p. 1, line 13, column (h).
(2) Exhibit D, Tab 2, Schedule 1, p. 2, line 3, column (a).

ENBRIDGE GAS INC.
EGD Rate Zone
Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed		Total Bill Change (\$) (e) = (c - a)	Bill Impact Including Federal Carbon Charge (%) (f) = (e / a)
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)		
		(a)	(b)	(c)	(d)		
Rate 1 - Small Customer		Annual Volume 2,400m ³					
1	Monthly Customer Charge (2)	309	\$ 25.72	309	\$ 25.72	-	0.0%
2	Delivery Charges (3)	255	10.6324	255	10.6353	0.07	0.0%
3	Gas Supply Transportation	117	4.8806	117	4.8806	-	0.0%
4	Gas Supply Commodity	252	10.4826	252	10.4826	-	0.0%
5	Federal Carbon Charge	366	15.2500	435	18.1100	68.64	18.8%
6	Total Bill - Sales Service	1,299	54.1056	1,367	56.9685	68.71	5.3%
7	Bundled Direct Purchase Impact WTS	1,047	43.6230	1,116	46.4859	68.71	6.6%
8	Bundled Direct Purchase Impact DTS	952	39.6824	1,021	42.5453	68.71	7.2%
Rate 1 - Large Customer		Annual Volume 5,048m ³					
9	Monthly Customer Charge (2)	309	\$ 25.72	309	\$ 25.72	-	0.0%
10	Delivery Charges (3)	525	10.3938	525	10.3967	0.15	0.0%
11	Gas Supply Transportation	246	4.8806	246	4.8806	-	0.0%
12	Gas Supply Commodity	529	10.4826	529	10.4826	-	0.0%
13	Federal Carbon Charge	770	15.2500	914	18.1100	144.37	18.8%
14	Total Bill - Sales Service	2,379	47.1211	2,523	49.9840	144.52	6.1%
15	Bundled Direct Purchase Impact WTS	1,850	36.6385	1,994	39.5014	144.52	7.8%
16	Bundled Direct Purchase Impact DTS	1,651	32.6979	1,795	35.5608	144.52	8.8%
Rate 6 - Small Customer		Annual Volume 5,048m ³					
17	Monthly Customer Charge (2)	956	\$ 79.64	956	\$ 79.64	-	0.0%
18	Delivery Charges (3)	580	11.4960	580	11.4969	0.15	0.0%
19	Gas Supply Transportation	246	4.8806	246	4.8806	-	0.0%
20	Gas Supply Commodity	530	10.5065	530	10.5065	-	0.0%
21	Federal Carbon Charge	770	15.2500	914	18.1100	144.37	18.8%
22	Total Bill - Sales Service	3,083	61.0649	3,227	63.9278	0.15	0.0%
23	Bundled Direct Purchase Impact WTS	2,552	50.5584	2,697	53.4213	144.52	5.7%
24	Bundled Direct Purchase Impact DTS	2,353	46.6178	2,498	49.4807	144.52	6.1%
Rate 6 - Average Customer		Annual Volume 22,606m ³					
25	Monthly Customer Charge (2)	956	\$ 79.64	956	\$ 79.64	-	0.0%
26	Delivery Charges (3)	2,102	9.3000	2,103	9.3029	1	0.0%
27	Gas Supply Transportation	1,103	4.8806	1,103	4.8806	-	0.0%
28	Gas Supply Commodity	2,375	10.5065	2,375	10.5065	-	0.0%
29	Federal Carbon Charge	3,447	15.2500	4,094	18.1100	647	18.8%
30	Total Bill - Sales Service	9,984	44.1646	10,631	47.0275	1	0.0%
31	Bundled Direct Purchase Impact WTS	7,609	33.6581	8,256	36.5210	647	8.5%
32	Bundled Direct Purchase Impact DTS	6,718	29.7175	7,365	32.5804	647	9.6%
Rate 6 - Large Customer		Annual Volume 339,124m ³					
33	Monthly Customer Charge (2)	956	\$ 79.64	956	\$ 79.64	-	0.0%
34	Delivery Charges (3)	22,850	6.7380	22,860	6.7409	10	0.0%
35	Gas Supply Transportation	16,551	4.8806	16,551	4.8806	-	0.0%
36	Gas Supply Commodity	35,630	10.5065	35,630	10.5065	-	0.0%
37	Federal Carbon Charge	51,716	15.2500	61,415	18.1100	9,699	18.8%
38	Total Bill - Sales Service	127,704	37.6569	137,412	40.5198	10	0.0%
39	Bundled Direct Purchase Impact WTS	92,073	27.1504	101,782	30.0133	9,709	10.5%
40	Bundled Direct Purchase Impact DTS	78,710	23.2098	88,419	26.0727	9,709	12.3%
Rate 100 - Small Customer		Annual Volume 339,188m ³					
41	Monthly Customer Charge (2)	1,657	\$ 138.07	1,657	\$ 138.07	-	0.0%
42	Delivery Charges (3)	23,933	7.0560	23,943	7.0589	10	0.0%
43	Gas Supply Transportation	16,554	4.8806	16,554	4.8806	-	0.0%
44	Gas Supply Commodity	35,637	10.5065	35,637	10.5065	-	0.0%
45	Federal Carbon Charge	51,726	15.2500	61,427	18.1100	9,701	18.8%
46	Total Bill - Sales Service	129,507	38.1816	139,218	41.0445	10	0.0%
47	Bundled Direct Purchase Impact WTS	93,871	27.6751	103,581	30.5380	9,711	10.3%
48	Bundled Direct Purchase Impact DTS	80,505	23.7345	90,215	26.5974	9,711	12.1%
Rate 100 - Large Customer		Annual Volume 1,500,000m ³					
49	Monthly Customer Charge (2)	1,657	\$ 138.07	1,657	\$ 138.07	-	0.0%
50	Delivery Charges (3)	187,678	12.5119	187,721	12.5148	44	0.0%
51	Gas Supply Transportation	73,209	4.8806	73,209	4.8806	-	0.0%
52	Gas Supply Commodity	157,598	10.5065	157,598	10.5065	-	0.0%
53	Federal Carbon Charge	228,750	15.2500	271,650	18.1100	42,900	18.8%
54	Total Bill - Sales Service	648,891	43.2594	691,835	46.1223	44	0.0%
55	Bundled Direct Purchase Impact WTS	491,294	32.7529	534,237	35.6158	42,944	8.7%
56	Bundled Direct Purchase Impact DTS	432,185	28.8123	475,128	31.6752	42,944	9.9%
Rate 100 - Average Customer		Annual Volume 598,567m ³					
57	Monthly Customer Charge (2)	1,657	\$ 138.07	1,657	\$ 138.07	-	0.0%
58	Delivery Charges (3)	89,677	14.9819	89,694	14.9848	17	0.0%
59	Gas Supply Transportation	29,214	4.8806	29,214	4.8806	-	0.0%
60	Gas Supply Commodity	62,888	10.5065	62,888	10.5065	-	0.0%
61	Federal Carbon Charge	91,281	15.2500	108,400	18.1100	17,119	18.8%
62	Total Bill - Sales Service	274,717	45.8958	291,854	48.7587	17	0.0%
63	Bundled Direct Purchase Impact WTS	211,829	35.3893	228,965	38.2522	17,136	8.1%
64	Bundled Direct Purchase Impact DTS	188,242	31.4487	205,378	34.3116	17,136	9.1%

ENBRIDGE GAS INC.
EGD Rate Zone
Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed		Total Bill Change (\$)	Bill Impact Including Federal Carbon Charge (%)
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)		
		(a)	(b)	(c)	(d)		
	Rate 110 - Small Customer	Annual Volume 598,568m ³					
65	Monthly Customer Charge (2)	7,930	\$ 660.87	7,930	\$ 660.87	-	0.0%
66	Delivery Charges (3)	17,921	2.9939	17,938	2.9968	17	0.1%
67	Gas Supply Transportation	29,214	4.8806	29,214	4.8806	-	0.0%
68	Gas Supply Commodity	62,511	10.4435	62,511	10.4435	-	0.0%
69	Federal Carbon Charge	91,282	15.2500	108,401	18.1100	17,119	18.8%
70	Total Bill - Sales Service	208,858	34.8929	225,994	37.7558	17	0.0%
71	Bundled Direct Purchase Impact WTS	146,346	24.4494	163,483	27.3123	17,136	11.7%
72	Bundled Direct Purchase Impact DTS	122,759	20.5088	139,896	23.3717	17,136	14.0%
	Rate 110 - Average Customer	Annual Volume 9,976,120m ³					
73	Monthly Customer Charge (2)	7,930	\$ 660.87	7,930	\$ 660.87	-	0.0%
74	Delivery Charges (3)	240,928	2.4151	241,218	2.4180	289	0.1%
75	Gas Supply Transportation	486,895	4.8806	486,895	4.8806	-	0.0%
76	Gas Supply Commodity	1,041,856	10.4435	1,041,856	10.4435	-	0.0%
77	Federal Carbon Charge	1,521,358	15.2500	1,806,675	18.1100	285,317	18.8%
78	Total Bill - Sales Service	3,298,968	33.0686	3,584,574	35.9315	289	0.0%
79	Bundled Direct Purchase Impact WTS	2,257,112	22.6251	2,542,718	25.4880	285,606	12.7%
80	Bundled Direct Purchase Impact DTS	1,863,993	18.6845	2,149,599	21.5474	285,606	15.3%
	Rate 110 - Large Customer	Annual Volume 9,976,121m ³					
81	Monthly Customer Charge (2)	7,930	\$ 660.87	7,930	\$ 660.87	-	0.0%
82	Delivery Charges (3)	294,369	2.9507	294,658	2.9536	289	0.1%
83	Gas Supply Transportation	486,895	4.8806	486,895	4.8806	-	0.0%
84	Gas Supply Commodity	1,041,856	10.4435	1,041,856	10.4435	-	0.0%
85	Federal Carbon Charge	1,521,358	15.2500	1,806,676	18.1100	285,317	18.8%
86	Total Bill - Sales Service	3,352,409	33.6043	3,638,015	36.4672	289	0.0%
87	Bundled Direct Purchase Impact WTS	2,310,552	23.1608	2,596,159	26.0237	285,606	12.4%
88	Bundled Direct Purchase Impact DTS	1,917,433	19.2202	2,203,040	22.0831	285,606	14.9%
	Rate 115 - Small Customer	Annual Volume 4,471,609m ³					
92	Monthly Customer Charge (2)	8,406	\$ 700.47	8,406	\$ 700.47	-	0.0%
93	Delivery Charges (3)	78,196	1.7487	78,326	1.7516	130	0.2%
94	Gas Supply Transportation	218,241	4.8806	218,241	4.8806	-	0.0%
95	Gas Supply Commodity	466,992	10.4435	466,992	10.4435	-	0.0%
96	Federal Carbon Charge	681,920	15.2500	809,808	18.1100	127,888	18.8%
97	Total Bill - Sales Service	1,453,756	32.5108	1,581,774	35.3737	130	0.0%
98	Bundled Direct Purchase Impact WTS	986,764	22.0673	1,114,781	24.9302	128,018	13.0%
99	Bundled Direct Purchase Impact DTS	810,555	18.1267	938,573	20.9896	128,018	15.8%
	Rate 115 - Large Customer	Annual Volume 69,832,850m ³					
100	Monthly Customer Charge (2)	8,406	\$ 700.47	8,406	\$ 700.47	-	0.0%
101	Delivery Charges (3)	1,160,309	1.6616	1,162,335	1.6645	2,025	0.2%
102	Gas Supply Transportation	3,408,262	4.8806	3,408,262	4.8806	-	0.0%
103	Gas Supply Commodity	7,292,994	10.4435	7,292,994	10.4435	-	0.0%
104	Federal Carbon Charge	10,649,510	15.2500	12,646,729	18.1100	1,997,220	18.8%
105	Total Bill - Sales Service	22,519,480	32.2477	24,518,725	35.1106	2,025	0.0%
106	Bundled Direct Purchase Impact WTS	15,226,487	21.8042	17,225,731	24.6671	1,999,245	13.1%
107	Bundled Direct Purchase Impact DTS	12,474,653	17.8636	14,473,898	20.7265	1,999,245	16.0%
	Rate 125 - Average Customer	Annual Volume 206,000,000m ³					
108	Monthly Customer Charge (2)	6,753	\$ 562.72	6,753	\$ 562.72	-	0.0%
109	Delivery Charges (3)	3,236,022	1.5709	3,241,996	1.5738	5,974	0.2%
110	Gas Supply Commodity	21,513,610	10.4435	21,513,610	10.4435	-	0.0%
111	Federal Carbon Charge	31,415,000	15.2500	37,306,600	18.1100	5,891,600	18.8%
112	Total Bill - Sales Service	56,164,632	27.2644	62,062,206	30.1273	5,974	0.0%
113	Bundled Direct Purchase	34,651,022	16.8209	40,548,596	19.6838	5,897,574	17.0%
	Rate 135 - Average Customer	Annual Volume 598,567m ³					
114	Monthly Customer Charge (2)	1,563	\$ 130.29	1,563	\$ 130.29	-	0.0%
115	Delivery Charges (3)	21,096	3.5245	21,114	3.5274	17	0.1%
116	Gas Supply Transportation (4)	24,163	4.0368	24,163	4.0368	-	0.0%
117	Gas Supply Commodity	62,535	10.4475	62,535	10.4475	-	0.0%
118	Federal Carbon Charge	91,281	15.2500	108,400	18.1100	17,119	18.8%
119	Total Bill - Sales Service	200,639	33.5199	217,776	36.3828	17	0.0%
120	Bundled Direct Purchase Impact WTS	138,104	23.0724	155,240	25.9353	17,136	12.4%
121	Bundled Direct Purchase Impact DTS	114,517	19.1318	131,653	21.9947	17,136	15.0%
	Rate 145 - Small Customer	Annual Volume 339,188m ³					
122	Monthly Customer Charge (2)	1,675	\$ 139.56	1,675	\$ 139.56	-	0.0%
123	Delivery Charges (3)	13,601	4.0100	13,611	4.0129	10	0.1%
124	Gas Supply Transportation (4)	14,696	4.3327	14,696	4.3327	-	0.0%
125	Gas Supply Commodity	35,437	10.4475	35,437	10.4475	-	0.0%
126	Federal Carbon Charge	51,726	15.2500	61,427	18.1100	9,701	18.8%
127	Total Bill - Sales Service	117,135	34.5339	126,846	37.3968	10	0.0%
128	Bundled Direct Purchase Impact WTS	81,698	24.0864	91,409	26.9493	9,711	11.9%
129	Bundled Direct Purchase Impact DTS	68,332	20.1458	78,043	23.0087	9,711	14.2%

ENBRIDGE GAS INC.
EGD Rate Zone
Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed		Total Bill Change (\$)	Bill Impact Including Federal Carbon Charge (%)
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)		
		(a)	(b)	(c)	(d)		
	Rate 145 - Large Customer	Annual Volume 598,567m ³					
130	Monthly Customer Charge (2)	1,675	\$ 139.56	1,675	\$ 139.56	-	0.0%
131	Delivery Charges (3)	23,118	3.8623	23,136	3.8652	17	0.1%
132	Gas Supply Transportation (4)	25,934	4.3327	25,934	4.3327	-	0.0%
133	Gas Supply Commodity	62,535	10.4475	62,535	10.4475	-	0.0%
134	Federal Carbon Charge	91,281	15.2500	109,400	18.1100	17,119	18.8%
135	Total Bill - Sales Service	204,544	34.1722	221,680	37.0351	17	0.0%
136	Bundled Direct Purchase Impact WTS	142,008	23.7247	159,145	26.5876	17,136	12.1%
137	Bundled Direct Purchase Impact DTS	118,421	19.7841	135,558	22.6470	17,136	14.5%
	Rate 170 - Small Customer	Annual Volume 9,976,120m ³					
138	Monthly Customer Charge (2)	3,777	\$ 314.79	3,777	\$ 314.79	-	0.0%
139	Delivery Charges (3)	85,432	0.8564	85,722	0.8593	289	0.3%
140	Gas Supply Transportation (4)	366,634	3.6751	366,634	3.6751	-	0.0%
141	Gas Supply Commodity	1,041,856	10.4435	1,041,856	10.4435	-	0.0%
142	Federal Carbon Charge	1,521,358	15.2500	1,806,675	18.1100	285,317	18.8%
143	Total Bill - Sales Service	3,019,059	30.2629	3,304,665	33.1258	289	0.0%
144	Bundled Direct Purchase Impact WTS	1,977,203	19.8194	2,262,809	22.6823	285,606	14.4%
145	Bundled Direct Purchase Impact DTS	1,584,084	15.8788	1,869,690	18.7417	285,606	18.0%
	Rate 170 - Average Customer	Annual Volume 9,976,121m ³					
146	Monthly Customer Charge (2)	3,777	\$ 314.79	3,777	\$ 314.79	-	0.0%
147	Delivery Charges (3)	95,102	0.9533	95,391	0.9562	289	0.3%
148	Gas Supply Transportation (4)	366,634	3.6751	366,634	3.6751	-	0.0%
149	Gas Supply Commodity	1,041,856	10.4435	1,041,856	10.4435	-	0.0%
150	Federal Carbon Charge	1,521,358	15.2500	1,806,676	18.1100	285,317	18.8%
151	Total Bill - Sales Service	3,028,729	30.3598	3,314,335	33.2227	289	0.0%
152	Bundled Direct Purchase Impact WTS	1,986,872	19.9163	2,272,479	22.7792	285,606	14.4%
153	Bundled Direct Purchase Impact DTS	1,593,753	15.9757	1,879,360	18.8386	285,606	17.9%
	Rate 170 - Large Customer	Annual Volume 69,832,850m ³					
154	Monthly Customer Charge (2)	3,777	\$ 314.79	3,777	\$ 314.79	-	0.0%
155	Delivery Charges (3)	598,136	0.8565	600,161	0.8594	2,025	0.3%
156	Gas Supply Transportation (4)	2,566,441	3.6751	2,566,441	3.6751	-	0.0%
157	Gas Supply Commodity	7,292,994	10.4435	7,292,994	10.4435	-	0.0%
158	Federal Carbon Charge	10,649,510	15.2500	12,646,729	18.1100	1,997,220	18.8%
159	Total Bill - Sales Service	21,110,858	30.2306	23,110,103	33.0935	2,025	0.0%
160	Bundled Direct Purchase Impact WTS	13,817,865	19.7871	15,817,109	22.6500	1,999,245	14.5%
161	Bundled Direct Purchase Impact DTS	11,066,031	15.8465	13,065,276	18.7094	1,999,245	18.1%
	Rate 200 - Average Customer (5)	Annual Volume 140,305,600m ³					
162	Monthly Customer Charge (2)	24,000	\$ 2,000.00	24,000	\$ 2,000.00	-	0.0%
163	Delivery Charges (3)	6,325,521	4.5084	6,329,590	4.5113	4,069	0.1%
164	Gas Supply Transportation (4)	6,587,243	4.6949	6,587,243	4.6949	-	0.0%
165	Gas Supply Commodity	14,652,675	10.4434	14,652,675	10.4434	-	0.0%
166	Federal Carbon Charge	-	0.0000	-	0.0000	-	0.0%
167	Total Bill - Sales Service	27,589,439	19.6638	27,593,507	19.6667	4,069	0.0%
168	Bundled Direct Purchase Impact WTS	12,936,763	9.2204	12,940,832	9.2233	4,069	0.0%
169	Bundled Direct Purchase Impact DTS	7,407,881	5.2798	7,411,950	5.2827	4,069	0.1%

Notes:
 (1) EB-2024-0166, Exhibit F, Tab 1, Schedule 1, Appendix D.
 (2) Unit rate is equal to monthly dollar amount.
 (3) Includes load balancing rate.
 (4) Includes curtailment credits.
 (5) Rate 200 customers are not charged the Federal Carbon Charge.

Filed: 2024-09-26

EB-2024-0251

Exhibit D

Tab 2

Schedule 3

Page 1 of 2

ENBRIDGE GAS INC.

EGD Rate Zone

Summary of 2023 Federal Carbon Deferral and Variance Accounts

Line No.	Particulars (\$000's)	Customer Carbon Charge	Facility Carbon Charge	Greenhouse Gas	Total
		- Variance Account 179-502 (a)	- Variance Account 179-503 (b)	Emissions Administration Deferral Account 179-501 (c)	
1	Balance	-	(110)	4,152	4,042
2	Interest	-	(48)	390	342
3	Total (1)	-	(157)	4,541	4,384

Notes:

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

ENBRIDGE GAS INC.
EGD Rate Zone
Allocation of 2023 Federal Carbon Deferral and Variance Accounts

Line No.	Particulars (\$000's)	Allocators		Account Balances			Total (f) = (c+d+e)
		Jan - Dec 2023 Total Volumes 10 ³ m ³ (a)	2023 Number of Customers (b)	Customer Carbon Charge - Variance Account 19-657 (c)	Facility Carbon Charge - Variance Account 19-676 (1) (d)	Greenhouse Gas Emissions Administration Deferral Account 19-678 (2) (e)	
	<u>In-franchise</u>						
1	Rate 1	4,677,347	2,152,304	-	(52)	4,206	4,153
2	Rate 6	4,450,159	171,210	-	(50)	335	285
4	Rate 100	50,015	19	-	(1)	0	(1)
5	Rate 110	1,254,228	466	-	(14)	1	(13)
6	Rate 115	355,028	18	-	(4)	0	(4)
7	Rate 125	1,106,860	4	-	(12)	0	(12)
8	Rate 135	66,869	43	-	(1)	0	(1)
9	Rate 145	49,883	17	-	(1)	0	(1)
10	Rate 170	243,960	20	-	(3)	0	(3)
11	Rate 200	188,441	1	-	(2)	0	(2)
12	Rate 300	-	1	-	-	0	0
13	Rate 315	-	-	-	-	-	-
14	Total In-franchise	<u>12,442,790</u>	<u>2,324,103</u>	<u>-</u>	<u>(139)</u>	<u>4,541</u>	<u>4,402</u>
	<u>Ex-franchise</u>						
15	Rate 332	1,633,881	1	-	(18)	0	(18)
16	Total Ex-franchise	<u>1,633,881</u>	<u>1</u>	<u>-</u>	<u>(18)</u>	<u>0</u>	<u>(18)</u>
17	Total In-franchise & Ex-franchise	<u>14,076,671</u>	<u>2,324,104</u>	<u>-</u>	<u>(157)</u>	<u>4,541</u>	<u>4,384</u>

Notes:

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

Filed: 2024-09-26
 EB-2024-0251
 Exhibit D
 Tab 2
 Schedule 4
 Page 1 of 1

ENBRIDGE GAS INC.
 EGD Rate Zone
 Unit Rates for One-Time Adjustment
2023 Federal Carbon Deferral and Variance Account Disposition

Line No.	Particulars	Deferral Balance for Disposition (\$000's) (1) (a)	Volume (10 ³ m ³) (b)	Unit Rate (cents/m ³) (c) = (a / b)*100
	<u>In-franchise</u>			
1	Rate 1	4,153	4,677,347	0.0888
2	Rate 6	285	4,450,159	0.0064
3	Rate 100	(1)	50,015	(0.0010)
4	Rate 110	(13)	1,254,228	(0.0010)
5	Rate 115	(4)	355,028	(0.0011)
6	Rate 125	(12)	1,106,860	(0.0011)
7	Rate 135	(1)	66,869	(0.0010)
8	Rate 145	(1)	49,883	(0.0011)
9	Rate 170	(3)	243,960	(0.0011)
10	Rate 200	(2)	188,441	(0.0011)
11	Rate 300 (2)	0	15,600	0.0125
12	Rate 315	-	-	-
13	Total In-franchise	<u>4,402</u>		
	<u>Ex-franchise</u>			
14	Rate 332	<u>(18)</u>	1,633,881	(0.0011)
15	Total Ex-franchise	<u>(18)</u>		

Notes:

- (1) Exhibit D, Tab 2, Schedule 3, page 2, column (f).
 (2) Rate 300 unit rate based on contracted demand (m³/d).

ENBRIDGE GAS INC.
 EGD Rate Zone
 Typical Bill Impacts
 2023 Federal Carbon Deferral and Variance Account Disposition

Line No.		Annual Bill Impact for Non-EPS						Annual Bill Impact for EPS				
		Annual Volume (m ³) (a)	Unit Rate (1) (cents/m ³) (b)	Total Adjustment (\$) (c) = (a x b) / 100	July 2024 Bill (2) (\$) (d)	July 2024 Bill Including Total Adjustment (\$) (e) = (d + c)	Bill Impact (%) (f) = (c / d)	Unit Rate (1) (cents/m ³) (g)	Total Adjustment (\$) (h) = (a x g) / 100	July 2024 Bill (2) (\$) (i)	July 2024 Bill Including Total Adjustment (\$) (j) = (i + h)	Bill Impact (%) (k) = (h / i)
1	Rate 1 - Small	2,400	0.0888	2.13	1,299	1,301	0.2%	0.0888	2.13	933	935	0.2%
2	Rate 6 - Average	22,606	0.0064	1.45	9,984	9,985	0.0%	0.0064	1.45	6,536	6,538	0.0%
3	Rate 6 - Large	339,124	0.0064	21.70	127,704	127,725	0.0%	0.0064	21.70	75,987	76,009	0.0%
4	Rate 100 - Small	339,188	(0.0010)	(3.54)	129,507	129,504	(0.0%)	(0.0010)	(3.54)	77,781	77,778	(0.0%)
5	Rate 100 - Large	1,500,000	(0.0010)	(15.67)	648,891	648,876	(0.0%)	(0.0010)	(15.67)	420,141	420,126	(0.0%)
6	Rate 110 - Small	598,568	(0.0010)	(6.26)	208,858	208,852	(0.0%)	(0.0010)	(6.26)	117,576	117,570	(0.0%)
7	Rate 110 - Large	9,976,121	(0.0010)	(104.37)	3,352,409	3,352,304	(0.0%)	(0.0010)	(104.37)	1,831,050	1,830,946	(0.0%)
8	Rate 115 - Small	4,471,609	(0.0011)	(49.58)	1,453,756	1,453,707	(0.0%)	(0.0011)	(49.58)	771,836	771,786	(0.0%)
9	Rate 115 - Large	69,832,850	(0.0011)	(774.35)	22,519,480	22,518,706	(0.0%)	(0.0011)	(774.35)	11,869,971	11,869,196	(0.0%)
10	Rate 125 - Average	206,000,000	(0.0010)	(2,045.82)	56,164,632	56,162,586	(0.0%)	(0.0010)	(2,045.82)	24,749,632	24,747,586	(0.0%)
11	Rate 135 - Average	598,567	(0.0010)	(5.94)	200,639	200,633	(0.0%)	(0.0010)	(5.94)	109,358	109,352	(0.0%)
12	Rate 145 - Small	339,188	(0.0011)	(3.57)	117,135	117,131	(0.0%)	(0.0011)	(3.57)	65,409	65,405	(0.0%)
13	Rate 145 - Large	598,567	(0.0011)	(6.30)	204,544	204,537	(0.0%)	(0.0011)	(6.30)	113,262	113,256	(0.0%)
14	Rate 170 - Small	9,976,121	(0.0011)	(110.01)	3,019,059	3,018,949	(0.0%)	(0.0011)	(110.01)	1,497,700	1,497,590	(0.0%)
15	Rate 170 - Large	69,832,850	(0.0011)	(770.08)	21,110,858	21,110,088	(0.0%)	(0.0011)	(770.08)	10,461,349	10,460,579	(0.0%)
16	Rate 200 - Average	140,305,600	(0.0011)					(0.0011)	(1,547.23)	27,589,439	27,587,891	(0.0%)

Notes:

- (1) Unit rates calculated at Exhibit D, Tab 2, Schedule 4.
- (2) Typical annual bill for a sales service customer at approved July 2024 QRAM rates (EB-2024-0166).

ENBRIDGE GAS INC.

Union Rate Zones

2025 Customer-Related Volumes and Derivation of Federal Carbon Charge Unit Rate

Effective April 1, 2025

Line No.	Particulars	Forecast Volumes (10 ³ m ³) (1) (a)	Less: Transportation Volumes (10 ³ m ³) (b)	Customer-Related Forecast Volumes (10 ³ m ³) (2) (c) = (a - b)	EPS Participant & Other Exempt Volumes (10 ³ m ³) (3) (d)	Net Volumes (10 ³ m ³) (e) = (c - d)	Federal Carbon Charge (\$/m ³) (4) (f)	Federal Carbon Cost (\$) (g) = (e * f * 1000)	Federal Carbon Charge Unit Rate (cents/m ³) (h) = (g/(e*1000))*100
<u>Union North In-franchise</u>									
1	Rate 01	1,013,413	-	1,013,413	269	1,013,143	0.1811	183,480,256	
2	Rate 10	318,344	-	318,344	9,212	309,132	0.1811	55,983,741	
3	Rate 20	991,428	-	991,428	893,817	97,610	0.1811	17,677,238	
4	Rate 25	190,423	-	190,423	178,399	12,024	0.1811	2,177,592	
5	Rate 100	927,064	-	927,064	927,064	-	0.1811	-	
6	Total Union North In-franchise	3,440,672	-	3,440,672	2,008,762	1,431,910		259,318,827	
<u>Union South In-franchise</u>									
7	Rate M1	3,220,995	-	3,220,995	2,156	3,218,839	0.1811	582,931,747	
8	Rate M2	1,232,396	-	1,232,396	94,918	1,137,477	0.1811	205,997,114	
9	Rate M4	585,465	-	585,465	247,538	337,928	0.1811	61,198,745	
10	Rate M5	58,417	-	58,417	12,743	45,674	0.1811	8,271,625	
11	Rate M7	810,074	-	810,074	636,246	173,828	0.1811	31,480,251	
12	Rate M9	98,223	-	98,223	98,223	-	0.1811	-	
13	Rate T1	407,282	-	407,282	329,596	77,686	0.1811	14,068,941	
14	Rate T2	5,118,431	-	5,118,431	5,049,146	69,285	0.1811	12,547,459	
15	Rate T3	255,661	-	255,661	255,661	-	0.1811	-	
16	Total Union South In-franchise	11,786,945	-	11,786,945	6,726,228	5,060,717		916,495,882	
17	Total In-franchise	15,227,617	-	15,227,617	8,734,990	6,492,627		1,175,814,709	
<u>Ex-franchise</u>									
18	Rate M12 - Firm Transportation	11,038,523	11,038,523	-	-	-	0.1811	-	
19	Rate M13	176,682	176,682	-	-	-	0.1811	-	
20	Rate M16	278,551	278,551	-	-	-	0.1811	-	
21	Rate M17	28,907	28,907	-	-	-	0.1811	-	
22	Rate C1 - Firm Transportation	9,878,697	9,878,697	-	-	-	0.1811	-	
23	Total Ex-franchise	21,401,360	21,401,360	-	-	-		-	
24	Total In-franchise & Ex-franchise	36,628,977	21,401,360	15,227,617	8,734,990	6,492,627		1,175,814,709	18.1100

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 2025 Facility Carbon Charge
 Effective April 1, 2025

Line No.	Particulars	Enbridge Gas Combined (a)
1	Total Facility Carbon Cost (\$000's) (1)	8,942
2	2024 Forecast Volumes (10^3m^3) (2)	51,856,157
3	Facility Carbon Charge (cents/ m^3) (line 1 / line 2 * 100)	0.0172
4	Facility Carbon Charge (\$/GJ) (line 3 / Heat Value * 10) (3)	0.004

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 24.
- (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 $39.09\text{ GJ}/10^3\text{m}^3$.

ENBRIDGE GAS INC.
 Union Rate Zones
 2025 Carbon Charge Unit Rate Summary
Effective April 1, 2025

Line No.	Particulars	Unit Rate (cents/m ³) (a)
1	Federal Carbon Charge (1)	18.1100
2	Facility Carbon Charge (2)	0.0172
3	Total (line 1 + line 2)	<u>18.1272</u>

Notes:

- (1) Exhibit D, Tab 3, Schedule 1, p. 1, line 24, column (h).
 (2) Exhibit D, Tab 3, Schedule 1, p. 2, line 3, column (a).

ENBRIDGE GAS INC.
 Union North Rate Zone
 Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed			Bill Impact
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill Change (\$)	Including Federal Carbon Charge (%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)
Rate 01 - Small Customer							
1	Monthly Customer Charge (2)	322	\$ 26.85	322	\$ 26.85	-	0.0%
2	Delivery Charges	233	10.6128	234	10.6157	0.06	0.0%
3	Gas Supply Transportation	173	7.8681	173	7.8681	-	0.0%
4	Gas Supply Commodity (3)	314	14.2865	314	14.2865	-	0.0%
5	Federal Carbon Charge	336	15.2500	398	18.1100	62.92	18.8%
6	Total Bill - Sales Service	1,379	62.6628	1,442	65.5257	62.98	4.6%
7	Bundled Direct Purchase Impact	1,064	48.3763	1,127	51.2392	62.98	5.9%
Rate 01 - Large Customer							
8	Monthly Customer Charge (2)	322	\$ 26.85	322	\$ 26.85	-	0.0%
9	Delivery Charges	3,837	9.5936	3,839	9.5965	1	0.0%
10	Gas Supply Transportation	3,147	7.8681	3,147	7.8681	-	0.0%
11	Gas Supply Commodity (3)	5,715	14.2865	5,715	14.2865	-	0.0%
12	Federal Carbon Charge	6,100	15.2500	7,244	18.1100	1,144	18.8%
13	Total Bill - Sales Service	19,121	47.8037	20,267	50.6666	1,145	6.0%
14	Bundled Direct Purchase Impact	13,407	33.5172	14,552	36.3801	1,145	8.5%
Rate 10 - Small Customer							
15	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
16	Delivery Charges	4,921	8.2014	4,923	8.2043	2	0.0%
17	Gas Supply Transportation	3,726	6.2100	3,726	6.2100	-	0.0%
18	Gas Supply Commodity (3)	8,572	14.2865	8,572	14.2865	-	0.0%
19	Federal Carbon Charge	9,150	15.2500	10,866	18.1100	1,716	18.8%
20	Total Bill - Sales Service	27,325	45.5409	29,042	48.4038	1,718	6.3%
21	Bundled Direct Purchase Impact	18,753	31.2544	20,470	34.1173	1,718	9.2%
Rate 10 - Large Customer							
22	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
23	Delivery Charges	18,306	7.3222	18,313	7.3251	7	0.0%
24	Gas Supply Transportation	15,525	6.2100	15,525	6.2100	-	0.0%
25	Gas Supply Commodity (3)	35,716	14.2865	35,716	14.2865	-	0.0%
26	Federal Carbon Charge	38,125	15.2500	45,275	18.1100	7,150	18.8%
27	Total Bill - Sales Service	108,628	43.4511	115,785	46.3140	7,157	6.6%
28	Bundled Direct Purchase Impact	72,911	29.1646	80,069	32.0275	7,157	9.8%
Rate 10 - Average Customer							
29	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
30	Delivery Charges	7,386	7.9423	7,389	7.9452	3	0.0%
31	Gas Supply Transportation	5,775	6.2100	5,775	6.2100	-	0.0%
32	Gas Supply Commodity (3)	13,286	14.2865	13,286	14.2865	-	0.0%
33	Federal Carbon Charge	14,183	15.2500	16,842	18.1100	2,660	18.8%
34	Total Bill - Sales Service	41,586	44.7166	44,249	47.5795	2,662	6.4%
35	Bundled Direct Purchase Impact	28,300	30.4301	30,962	33.2930	2,662	9.4%
Rate 20 - Small Customer							
36	Monthly Customer Charge (2)	13,454	\$ 1,121.17	13,454	\$ 1,121.17	-	0.0%
37	Delivery Charges	81,219	2.7073	81,306	2.7102	87	0.1%
38	Gas Supply Transportation	67,878	2.2626	67,878	2.2626	-	0.0%
39	Gas Supply Commodity (3)	415,635	13.8545	415,635	13.8545	-	0.0%
40	Federal Carbon Charge	457,500	15.2500	543,300	18.1100	85,800	18.8%
41	Total Bill - Sales Service	1,035,685	34.5228	1,121,572	37.3857	85,887	8.3%
42	Bundled Direct Purchase Impact	620,050	20.6683	705,937	23.5312	85,887	13.9%
Rate 20 - Large Customer							
43	Monthly Customer Charge (2)	13,454	\$ 1,121.17	13,454	\$ 1,121.17	-	0.0%
44	Delivery Charges	354,140	2.3609	354,575	2.3638	435	0.1%
45	Gas Supply Transportation	290,904	1.9394	290,904	1.9394	-	0.0%
46	Gas Supply Commodity (3)	2,078,175	13.8545	2,078,175	13.8545	-	0.0%
47	Federal Carbon Charge	2,287,500	15.2500	2,716,500	18.1100	429,000	18.8%
48	Total Bill - Sales Service	5,024,174	33.4945	5,453,609	36.3574	429,435	8.5%
49	Bundled Direct Purchase Impact	2,945,999	19.6400	3,375,434	22.5029	429,435	14.6%
Rate 25 - Average Customer							
50	Monthly Customer Charge (2)	4,542	\$ 378.50	4,542	\$ 378.50	-	0.0%
51	Delivery Charges	76,166	3.3480	76,232	3.3509	66	0.1%
52	Gas Supply Transportation	26,344	1.1580	26,344	1.1580	-	0.0%
53	Gas Supply Commodity (3)	315,190	13.8545	315,190	13.8545	-	0.0%
54	Federal Carbon Charge	346,938	15.2500	412,003	18.1100	65,065	18.8%
55	Total Bill - Sales Service	769,180	33.8101	834,311	36.6730	65,131	8.5%
56	Bundled Direct Purchase Impact	453,990	19.9556	519,121	22.8185	65,131	14.3%
Rate 100 - Small Customer							
57	Monthly Customer Charge (2)	19,987	\$ 1,665.57	19,987	\$ 1,665.57	-	0.0%
58	Delivery Charges	319,490	1.1833	320,273	1.1862	783	0.2%
59	Gas Supply Transportation	1,115,631	4.1320	1,115,631	4.1320	-	0.0%
60	Gas Supply Commodity (3)	3,740,715	13.8545	3,740,715	13.8545	-	0.0%
61	Federal Carbon Charge	4,117,500	15.2500	4,889,700	18.1100	772,200	18.8%
62	Total Bill - Sales Service	9,313,324	34.4938	10,086,307	37.3567	772,983	8.3%
63	Unbundled Direct Purchase Impact	4,456,977	16.5073	5,229,960	19.3702	772,983	18.7%
Rate 100 - Large Customer							
64	Monthly Customer Charge (2)	19,987	\$ 1,665.57	19,987	\$ 1,665.57	-	0.0%
65	Delivery Charges	2,747,147	1.1446	2,754,107	1.1475	6,960	0.3%
66	Gas Supply Transportation	9,482,867	3.9512	9,482,867	3.9512	-	0.0%
67	Gas Supply Commodity (3)	33,250,800	13.8545	33,250,800	13.8545	-	0.0%
68	Federal Carbon Charge	36,600,000	15.2500	43,464,000	18.1100	6,864,000	18.8%
69	Total Bill - Sales Service	82,100,801	34.2087	88,971,761	37.0716	6,870,960	8.4%
70	Unbundled Direct Purchase Impact	39,367,134	16.4030	46,238,094	19.2659	6,870,960	17.5%

Notes:

- (1) EB-2024-0166, Exhibit F, Tab 1, Schedule 1, Appendix D.
 (2) Unit rate is equal to monthly dollar amount.
 (3) Gas Supply charges based on Union North East Zone.

ENBRIDGE GAS INC.
 Union South Rate Zone
 Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed			Bill Impact
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill Change (\$)	Including Federal Carbon Charge (%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)
<u>Rate M1 - Small Customer</u>							
1	Monthly Customer Charge (2)	322	\$ 26.85	322	\$ 26.85	-	0.0%
2	Delivery Charges	143	6.4998	143	6.5027	0.06	0.0%
3	Gas Supply Charges	308	13.9965	308	13.9965	-	0.0%
4	Federal Carbon Charge	336	15.2500	398	18.1100	62.92	18.8%
5	Total Bill - Sales Service	1,109	50.3917	1,172	53.2546	62.98	5.7%
6	Bundled Direct Purchase Impact	801	36.3952	864	39.2581	62.98	7.9%
<u>Rate M1 - Large Customer</u>							
7	Monthly Customer Charge (2)	322	\$ 26.85	322	\$ 26.85	-	0.0%
8	Delivery Charges	2,348	5.8704	2,349	5.8733	1	0.0%
9	Gas Supply Charges	5,599	13.9965	5,599	13.9965	-	0.0%
10	Federal Carbon Charge	6,100	15.2500	7,244	18.1100	1,144	18.8%
11	Total Bill - Sales Service	14,369	35.9224	15,514	38.7853	1,145	8.0%
12	Bundled Direct Purchase Impact	8,770	21.9259	9,916	24.7888	1,145	13.1%
<u>Rate M2 - Small Customer</u>							
13	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
14	Delivery Charges	3,989	6.6486	3,991	6.6515	2	0.0%
15	Gas Supply Charges	8,398	13.9965	8,398	13.9965	-	0.0%
16	Federal Carbon Charge	9,150	15.2500	10,866	18.1100	1,716	18.8%
17	Total Bill - Sales Service	22,493	37.4881	24,211	40.3510	2	0.0%
18	Bundled Direct Purchase Impact	14,095	23.4916	15,813	26.3545	1,718	12.2%
<u>Rate M2 - Large Customer</u>							
19	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
20	Delivery Charges	15,818	6.3272	15,825	6.3301	7	0.0%
21	Gas Supply Charges	34,991	13.9965	34,991	13.9965	-	0.0%
22	Federal Carbon Charge	38,125	15.2500	45,275	18.1100	7,150	18.8%
23	Total Bill - Sales Service	89,890	35.9560	97,047	38.8189	7,157	8.0%
24	Bundled Direct Purchase Impact	54,899	21.9595	62,056	24.8224	7,157	13.0%
<u>Rate M2 - Average Customer</u>							
25	Monthly Customer Charge (2)	956	\$ 79.65	956	\$ 79.65	-	0.0%
26	Delivery Charges	4,829	6.6153	4,831	6.6182	2	0.0%
27	Gas Supply Charges	10,217	13.9965	10,217	13.9965	-	0.0%
28	Federal Carbon Charge	11,133	15.2500	13,220	18.1100	2,088	18.8%
29	Total Bill - Sales Service	27,135	37.1712	29,225	40.0341	2,090	7.7%
30	Bundled Direct Purchase Impact	16,917	23.1747	19,007	26.0376	2,090	12.4%
<u>Rate M4 - Small Customer</u>							
31	Delivery Charges	58,954	6.7376	58,979	6.7405	25	0.0%
32	Gas Supply Charges	122,469	13.9965	122,469	13.9965	-	0.0%
33	Federal Carbon Charge	133,438	15.2500	158,463	18.1100	25,025	18.8%
34	Total Bill - Sales Service	314,861	35.9841	339,911	38.8470	25,050	8.0%
35	Bundled Direct Purchase Impact	192,391	21.9876	217,442	24.8505	25,050	13.0%
<u>Rate M4 - Large Customer</u>							
36	Delivery Charges	472,901	3.9408	473,249	3.9437	348	0.1%
37	Gas Supply Charges	1,679,580	13.9965	1,679,580	13.9965	-	0.0%
38	Federal Carbon Charge	1,830,000	15.2500	2,173,200	18.1100	343,200	18.8%
39	Total Bill - Sales Service	3,982,481	33.1873	4,326,029	36.0502	343,548	8.6%
40	Bundled Direct Purchase Impact	2,302,901	19.1908	2,646,449	22.0537	343,548	14.9%
<u>Rate M5 - Small Customer</u>							
41	Monthly Customer Charge (2)	9,327	\$ 777.26	9,327	\$ 9,327.12	-	0.0%
42	Delivery Charges	29,603	3.5882	29,627	3.5911	24	0.1%
43	Gas Supply Charges	115,471	13.9965	115,471	13.9965	-	0.0%
44	Federal Carbon Charge	125,813	15.2500	149,408	18.1100	23,595	18.8%
45	Total Bill - Sales Service	280,213	33.9653	303,832	36.8282	23,619	8.4%
46	Bundled Direct Purchase Impact	164,742	19.9688	188,361	22.8317	23,619	14.3%
<u>Rate M5 - Large Customer</u>							
47	Monthly Customer Charge (2)	9,327	\$ 777.26	9,327	\$ 777.26	-	0.0%
48	Delivery Charges	217,237	3.3421	217,425	3.3450	189	0.1%
49	Gas Supply Charges	909,773	13.9965	909,773	13.9965	-	0.0%
50	Federal Carbon Charge	991,250	15.2500	1,177,150	18.1100	185,900	18.8%
51	Total Bill - Sales Service	2,127,586	32.7321	2,313,675	35.5950	186,089	8.7%
52	Bundled Direct Purchase Impact	1,217,814	18.7356	1,403,902	21.5985	186,089	15.3%
<u>Rate M7 - Small Customer</u>							
53	Delivery Charges	871,721	2.4214	872,765	2.4243	1,044	0.1%
54	Gas Supply Charges	5,038,740	13.9965	5,038,740	13.9965	-	0.0%
55	Federal Carbon Charge	5,490,000	15.2500	6,519,600	18.1100	1,029,600	18.8%
56	Total Bill - Sales Service	11,400,461	31.6679	12,431,105	34.5308	1,044	0.0%
57	Bundled Direct Purchase Impact	871,721	2.4214	872,765	2.4243	1,044	0.1%
<u>Rate M7 - Large Customer</u>							
58	Delivery Charges	3,396,434	6.5316	3,397,942	6.5345	1,508	0.0%
59	Gas Supply Charges	7,278,180	13.9965	7,278,180	13.9965	-	0.0%
60	Federal Carbon Charge	7,930,000	15.2500	9,417,200	18.1100	1,487,200	18.8%
61	Total Bill - Sales Service	18,604,614	35.7781	20,093,322	38.6410	1,508	0.0%
62	Bundled Direct Purchase Impact	3,396,434	6.5316	3,397,942	6.5345	1,508	0.0%

ENBRIDGE GAS INC.
 Union South Rate Zone
 Calculation of Bill Impacts for Typical Customers

Line No.	Particulars	EB-2024-0166 - Current Approved (1)		EB-2024-0251 - Proposed			Bill Impact
		Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill (\$)	Unit Rate (cents/m ³)	Total Bill Change (\$)	Including Federal Carbon Charge (%)
		(a)	(b)	(c)	(d)	(e) = (c - a)	(f) = (e / a)
	<u>Rate M9 - Small Customer (3)</u>						
63	Delivery Charges	209,336	3.0120	209,538	3.0149	202	0.1%
64	Gas Supply Charges	972,757	13.9965	972,757	13.9965	-	0.0%
65	Federal Carbon Charge	-	0.0000	-	0.0000	-	0.0%
66	Total Bill - Sales Service	1,182,093	17.0085	1,182,294	17.0114	202	0.0%
67	Bundled Direct Purchase Impact	209,336	3.0120	209,538	3.0149	202	0.1%
	<u>Rate M9 - Large Customer (3)</u>						
68	Delivery Charges	621,999	3.0826	622,584	3.0855	585	0.1%
69	Gas Supply Charges	2,824,214	13.9965	2,824,214	13.9965	-	0.0%
70	Federal Carbon Charge	-	0.0000	-	0.0000	-	0.0%
71	Total Bill - Sales Service	3,446,212	17.0791	3,446,798	17.0820	585	0.0%
72	Bundled Direct Purchase Impact	621,999	3.0826	622,584	3.0855	585	0.1%
	<u>Rate T1 - Small Customer</u>						
73	Monthly Customer Charge (2)	26,577	\$ 2,214.74	26,577	\$ 2,214.74	-	0.0%
74	Delivery Charges	145,630	1.9322	145,849	1.9351	219	0.2%
75	Gas Supply Charges	1,054,916	13.9965	1,054,916	13.9965	-	0.0%
76	Federal Carbon Charge	1,149,393	15.2500	1,364,951	18.1100	215,558	18.8%
77	Total Bill - Sales Service	2,376,516	31.5313	2,592,292	34.3942	219	0.0%
78	Bundled Direct Purchase Impact	1,321,599	17.5348	1,537,376	20.3977	215,777	16.3%
	<u>Rate T1 - Average Customer</u>						
79	Monthly Customer Charge (2)	26,577	\$ 2,214.74	26,577	\$ 2,214.74	-	0.0%
80	Delivery Charges	240,612	2.0803	240,947	2.0832	335	0.1%
81	Gas Supply Charges	1,618,827	13.9965	1,618,827	13.9965	-	0.0%
82	Federal Carbon Charge	1,763,806	15.2500	2,094,591	18.1100	330,786	18.8%
83	Total Bill - Sales Service	3,649,821	31.5566	3,980,942	34.4195	335	0.0%
84	Bundled Direct Purchase Impact	2,030,994	17.5601	2,362,115	20.4230	331,121	16.3%
	<u>Rate T1 - Large Customer</u>						
85	Monthly Customer Charge (2)	26,577	\$ 2,214.74	26,577	\$ 2,214.74	-	0.0%
86	Delivery Charges	574,367	2.2415	575,110	2.2444	743	0.1%
87	Gas Supply Charges	3,586,474	13.9965	3,586,474	13.9965	-	0.0%
88	Federal Carbon Charge	3,907,672	15.2500	4,640,521	18.1100	732,849	18.8%
89	Total Bill - Sales Service	8,095,090	31.5917	8,828,682	34.4546	743	0.0%
90	Bundled Direct Purchase Impact	4,508,616	17.5952	5,242,208	20.4581	733,592	16.3%
	<u>Rate T2 - Small Customer</u>						
91	Monthly Customer Charge (2)	83,859	\$ 6,988.28	83,859	\$ 6,988.28	-	0.0%
92	Delivery Charges	704,094	1.1882	705,813	1.1911	1,718	0.2%
93	Gas Supply Charges	8,293,766	13.9965	8,293,766	13.9965	-	0.0%
94	Federal Carbon Charge	9,036,540	15.2500	10,731,262	18.1100	1,694,722	18.8%
95	Total Bill - Sales Service	18,118,260	30.5762	19,814,700	33.4391	1,718	0.0%
96	Bundled Direct Purchase Impact	9,824,494	16.5797	11,520,934	19.4426	1,696,440	17.3%
	<u>Rate T2 - Average Customer</u>						
97	Monthly Customer Charge (2)	83,859	\$ 6,988.28	83,859	\$ 6,988.28	-	0.0%
98	Delivery Charges	1,849,034	0.9348	1,854,770	0.9377	5,736	0.3%
99	Gas Supply Charges	27,683,656	13.9965	27,683,656	13.9965	-	0.0%
100	Federal Carbon Charge	30,162,952	15.2500	35,819,742	18.1100	5,656,790	18.8%
101	Total Bill - Sales Service	59,779,502	30.2237	65,442,028	33.0866	5,736	0.0%
102	Bundled Direct Purchase Impact	32,095,846	16.2272	37,758,371	19.0901	5,662,526	17.6%
	<u>Rate T2 - Large Customer</u>						
103	Monthly Customer Charge (2)	83,859	\$ 6,988.28	83,859	\$ 6,988.28	-	0.0%
104	Delivery Charges	3,128,493	0.8453	3,139,225	0.8482	10,733	0.3%
105	Gas Supply Charges	51,799,507	13.9965	51,799,507	13.9965	-	0.0%
106	Federal Carbon Charge	56,438,573	15.2500	67,023,118	18.1100	10,584,545	18.8%
107	Total Bill - Sales Service	111,450,431	30.1145	122,045,709	32.9774	10,733	0.0%
108	Bundled Direct Purchase Impact	59,650,924	16.1180	70,246,202	18.9809	10,595,278	17.8%
	<u>Rate T3 - Large Customer (3)</u>						
109	Monthly Customer Charge (2)	279,791	\$ 23,315.94	279,791	\$ 23,315.94	-	0.0%
110	Delivery Charges	6,359,934	2.3321	6,367,842	2.3350	7,909	0.1%
111	Gas Supply Charges	38,170,135	13.9965	38,170,135	13.9965	-	0.0%
112	Federal Carbon Charge	-	0.0000	-	0.0000	-	0.0%
113	Total Bill - Sales Service	44,809,860	16.4312	44,817,769	16.4341	7,909	0.0%
114	Bundled Direct Purchase Impact	6,639,725	2.4347	6,647,634	2.4376	7,909	0.1%

Notes:

- (1) EB-2024-0166, Exhibit F, Tab 1, Schedule 1, Appendix D.
 (2) Unit rate is equal to monthly dollar amount.
 (3) Rate M9 and Rate T3 customers are not charged the Federal Carbon Charge.

ENBRIDGE GAS INC.
 Union Rate Zones
Summary of 2023 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	-	(4,717)	2,615	(2,102)
2	Interest	-	(538)	241	(297)
3	Total (1)	<u>-</u>	<u>(5,255)</u>	<u>2,856</u>	<u>(2,399)</u>

Notes:

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

ENBRIDGE GAS INC.
Union Rate Zones
Allocation of 2023 Federal Carbon Deferral and Variance Accounts

Line No.	Particulars (\$000's)	Allocators		Account Balances			Total (f) = (c+d+e)
		Jan - Dec 2023 Total Volumes 10 ³ m ³ (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 North In-franchise</u>							
1	Rate 01	931,782	31,817	-	(100)	573	473
2	Rate 10	305,249	2,759	-	(33)	50	17
3	Rate 20	1,074,225	2,373	-	(115)	43	(72)
4	Rate 25	255,665	2,089	-	(27)	38	10
5	Rate 100	942,952	953	-	(101)	17	(84)
6	Total North In-franchise	3,509,873	39,992	-	(376)	720	344
<u>Union South In-franchise</u>							
7	Rate M1	2,925,618	80,159	-	(313)	1,443	1,130
8	Rate M2	1,151,051	7,539	-	(123)	136	12
9	Rate M4	564,595	2,801	-	(60)	50	(10)
10	Rate M5	58,966	3,131	-	(6)	56	50
11	Rate M7	769,537	787	-	(82)	14	(68)
12	Rate M9	97,880	108	-	(10)	2	(9)
13	Rate T1	397,887	2,036	-	(43)	37	(6)
14	Rate T2	5,069,101	5,624	-	(543)	101	(442)
15	Rate T3	255,245	627	-	(27)	11	(16)
16	Total South In-franchise	11,289,881	102,812	-	(1,209)	1,851	642
<u>Ex-franchise</u>							
17	Rate M12	20,690,666	14,918	-	(2,216)	269	(1,947)
18	Rate M13	47,278	0	-	(5)	0	(5)
19	Rate M16	273,664	21	-	(29)	0	(29)
20	Rate M17	28,586		-	(3)	-	(3)
21	Rate C1	13,233,295	323	-	(1,417)	6	(1,411)
22	Excess Utility Storage Space	-	597	-	-	11	11
23	Total Ex-franchise	34,273,489	15,859	-	(3,670)	285	(3,385)
24	Total In-franchise & Ex-franchise	49,073,243	158,663	-	(5,255)	2,856	(2,399)

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
2023 Federal Carbon Deferral and Variance Account Disposition

Line No.	Particulars	Deferral Balance for Disposition (\$000's) (1)	Volume (10 ³ m ³) (b)	Unit Rate (cents/m ³) (c) = (a / b)*100
<u>Union North In-franchise</u>				
1	Rate 01	473	931,782	0.0508
2	Rate 10	17	305,249	0.0056
3	Rate 20	(72)	1,074,225	(0.0067)
4	Rate 25	10	255,665	0.0040
5	Rate 100	(84)	942,952	(0.0089)
6	Total North In-franchise	<u>344</u>		
<u>Union South In-franchise</u>				
7	Rate M1	1,130	2,925,618	0.0386
8	Rate M2	12	1,151,051	0.0011
9	Rate M4	(10)	564,595	(0.0018)
10	Rate M5	50	58,966	0.0849
11	Rate M7	(68)	769,537	(0.0089)
12	Rate M9	(9)	97,880	(0.0087)
13	Rate T1	(6)	397,887	(0.0015)
14	Rate T2	(442)	5,069,101	(0.0087)
15	Rate T3	(16)	255,245	(0.0063)
16	Total South In-franchise	<u>642</u>		
<u>Ex-franchise (2)</u>				
17	Rate M12	(1,947)		
18	Rate M13	(5)		
19	Rate M16	(29)		
20	Rate M17	(3)		
21	Rate C1	(1,411)		
22	Total Ex-franchise	<u>(3,396)</u>		

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
2023 Federal Carbon Deferral and Variance Account Disposition

Line No.	Annual Volume (m ³) (a)	Annual Bill Impact for Non-EPS					Annual Bill Impact for EPS					
		Unit Rate (1) (cents/m ³) (b)	Total Adjustment (\$) (c) = (a x b) / 100	July 2024 Bill (2) (\$) (d)	July 2024 Bill Including Total Adjustment (\$) (e) = (d + c)	Bill Impact (%) (f) = (c / d)	Unit Rate (1) (cents/m ³) (g)	Total Adjustment (\$) (h) = (a x g) / 100	July 2024 Bill (2) (\$) (i)	July 2024 Bill Including Total Adjustment (\$) (j) = (i + h)	Bill Impact (%) (k) = (h / i)	
		<u>Union North In-franchise</u>										
1	Rate 01 - Small	2,200	0.0508	1.12	1,379	1,380	0.1%	0.0508	1.12	1,043	1,044	0.1%
2	Rate 10 - Small	60,000	0.0056	3.34	27,325	27,328	0.0%	0.0056	3.34	18,175	18,178	0.0%
3	Rate 10 - Large	250,000	0.0056	13.90	108,628	108,642	0.0%	0.0056	13.90	70,503	70,517	0.0%
4	Rate 20 - Small	3,000,000	(0.0067)	(202)	1,035,685	1,035,483	(0.0%)	(0.0067)	(202)	578,185	577,983	(0.0%)
5	Rate 20 - Large	15,000,000	(0.0067)	(1,010)	5,024,174	5,023,164	(0.0%)	(0.0067)	(1,010)	2,736,674	2,735,664	(0.0%)
6	Rate 25 - Average	2,275,000	0.0040	91	769,180	769,271	0.0%	0.0040	91	422,242	422,333	0.0%
7	Rate 100 - Small	27,000,000	(0.0089)	(2,400)	9,313,324	9,310,923	(0.0%)	(0.0089)	(2,400)	5,195,824	5,193,423	(0.0%)
8	Rate 100 - Large	240,000,000	(0.0089)	(21,334)	82,100,801	82,079,466	(0.0%)	(0.0089)	(21,334)	45,500,801	45,479,466	(0.0%)
<u>Union South In-franchise</u>												
9	Rate M1 - Small	2,200	0.0386	0.85	1,109	1,109	0.1%	0.0386	0.85	773	774	0.1%
10	Rate M2 - Small	60,000	0.0011	0.65	22,493	22,493	0.0%	0.0011	0.65	13,343	13,343	0.0%
11	Rate M2 - Large	250,000	0.0011	2.70	89,890	89,893	0.0%	0.0011	2.70	51,765	51,768	0.0%
12	Rate M4 - Small	875,000	(0.0018)	(16)	314,861	314,845	(0.0%)	(0.0018)	(16)	181,423	181,407	(0.0%)
13	Rate M4 - Large	12,000,000	(0.0018)	(213)	3,982,481	3,982,267	(0.0%)	(0.0018)	(213)	2,152,481	2,152,267	(0.0%)
14	Rate M5 - Small	825,000	0.0849	700	280,213	280,914	0.2%	0.0849	700	154,401	155,101	0.5%
15	Rate M5 - Large	6,500,000	0.0849	5,516	2,127,586	2,133,102	0.3%	0.0849	5,516	1,136,336	1,141,852	0.5%
16	Rate M7 - Small	36,000,000	(0.0089)	(3,192)	11,400,461	11,397,268	(0.0%)	(0.0089)	(3,192)	5,910,461	5,907,268	(0.1%)
17	Rate M7 - Large	52,000,000	(0.0089)	(4,611)	18,604,614	18,600,003	(0.0%)	(0.0089)	(4,611)	10,674,614	10,670,003	(0.0%)
18	Rate M9 - Small	6,950,000	(0.0087)	(606)				(0.0087)	(606)	1,182,093	1,181,487	(0.1%)
19	Rate M9 - Large	20,178,000	(0.0087)	(1,760)				(0.0087)	(1,760)	3,446,212	3,444,452	(0.1%)
20	Rate T1 - Small	7,537,000	(0.0015)	(113)	2,376,516	2,376,403	(0.0%)	(0.0015)	(113)	1,227,123	1,227,010	(0.0%)
21	Rate T1 - Average	11,565,938	(0.0015)	(173)	3,649,821	3,649,647	(0.0%)	(0.0015)	(173)	1,886,015	1,885,842	(0.0%)
22	Rate T1 - Large	25,624,080	(0.0015)	(384)	8,095,090	8,094,706	(0.0%)	(0.0015)	(384)	4,187,418	4,187,034	(0.0%)
23	Rate T2 - Small	59,256,000	(0.0087)	(5,162)	18,118,260	18,113,097	(0.0%)	(0.0087)	(5,162)	9,081,720	9,076,557	(0.1%)
24	Rate T2 - Average	197,789,850	(0.0087)	(17,231)	59,779,502	59,762,271	(0.0%)	(0.0087)	(17,231)	29,616,550	29,599,319	(0.1%)
25	Rate T2 - Large	370,089,000	(0.0087)	(32,241)	111,450,431	111,418,190	(0.0%)	(0.0087)	(32,241)	55,011,859	54,979,617	(0.1%)
26	Rate T3 - Large	272,712,000	(0.0063)	(17,152)				(0.0063)	(17,152)	44,809,860	44,792,708	(0.0%)

Notes:

- (1) Exhibit D, Tab 3, Schedule 4, column (c).
- (2) Typical annual bill for a sales service customer at approved July 2024 QRAM rates (EB-2024-0166).

**Enbridge Gas Inc. has applied to increase its
natural gas distribution rates**

Enbridge Gas Inc. has applied to increase its natural gas rates effective April 1, 2025, to recover costs associated with meeting its obligations under the *Greenhouse Gas Pollution Pricing Act* and the regulations under the *Ontario Emissions Performance Standards*, as well as to recover other related account balances.

If the application is approved as filed, a typical residential customer of Enbridge Gas Inc. would see the following total annual increase:

EGD Rate Zone (2,400 m3)	\$70.84
Union South Rate Zone (2,200 m3)	\$63.83
Union North Rate Zone (2,200 m3)	\$64.10

For a typical residential customer, these increases include an annual bill increase arising from the 2025 carbon charges of \$68.71 (EGD) and \$62.98 (Union South and Union North); plus, a one-time charge of \$2.13 (EGD), \$0.85 (Union South) and \$1.12 (Union North) to recover the balances in the related deferral and variance accounts.

Other customers, including businesses, will also be affected. It's important to review the application carefully to determine whether you may be affected by the proposed changes.

The federal government's *Greenhouse Gas Pollution Pricing Act* establishes a carbon pricing program under which a natural gas utility in Ontario, such as Enbridge Gas Inc., is required to pay a carbon charge to the federal government on the volume of natural gas that it delivers to its customers, and on the volume of natural gas used in the operation of Enbridge Gas Inc.'s natural gas distribution system. The federal carbon charge came into effect on April 1, 2019, has increased annually on April 1st between 2020 and 2024 and will increase again on April 1, 2025.

The *Ontario Emissions Performance Standards* program is the Ontario government's carbon pricing system for industrial emitters that came into effect on January 1, 2022, and replaced the federal government's Output-Based Pricing System in Ontario.

YOU SHOULD KNOW

There are three types of OEB hearings: oral, electronic and written. The applicant has applied for, and the OEB intends to proceed with, a written hearing. If you think a different hearing type is needed, you can write to us to explain why.

This hearing will be held under section 78 of the **Ontario Energy Board Act, 1998**.

Ce document est aussi disponible en français.

During this hearing, we will hear questions and arguments from participants about this case. We will also hear questions and arguments from participants that have registered as Intervenors. After the hearing, we will decide whether to approve the application.

HAVE YOUR SAY

You have the right to information about this application and to participate in the process.

Visit www.oeb.ca/notice and use file number **EB-2024-0251** to:

- Review the application
- File a letter with your comments
- Apply to become an intervenor

IMPORTANT DATES

You must engage with the OEB on or before **November 12th, 2024** to:

- Provide input on the hearing type (oral, electronic or written)
- Apply to be an intervenor

If you do not, the hearing will move forward without you, and you will not receive any further notice of the proceeding.

PRIVACY

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. If you are a business or if you apply to become an intervenor, all the information you file will be on the OEB website.

LEARN MORE**Ontario Energy Board**

☎ /TTY: 1 877-632-2727

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Enbridge Gas Inc.

☎ 1 877-362-7434

🕒 Monday - Friday: 8:30 AM - 5:00 PM

🌐 <https://www.enbridgegas.com/en/about-enbridge-gas/regulatory>



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Fax: 905-953-5100

October 15, 2024

Sent to: illumination@cpbf-fbpc.org

Dear Sylvia Harnarain:

RE: Proclamation and Lighting Request – Canadian Premature Babies Foundation and World Premature Day Illumination Campaign – November 17, 2024

I am writing to advise that your proclamation request has been approved in accordance with the Council-approved [Proclamation, Lighting Request and Community Flag Raising Policy](#), and the Town of Newmarket will proclaim November 17, 2024 as World Premature Day. Approved proclamations, lighting requests, and community flag raisings will be listed on the Town's website. Approved lighting and community flag raisings will also be communicated to the public through the Town's social media.

In addition, the Fred A. Lundy Bridge located on Water Street will be illuminated in purple on November 17, 2024 to recognize the World Premature Day Illumination Campaign. Please note that the lighting will occur from sunset until 11:00 PM.

If you have any questions regarding the above, please feel free to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Simon Granat", written over a horizontal line.

Simon Granat

Legislative Coordinator



October 15, 2024

Sent to: illumination@cpbf-fbpc.org

Dear Sylvia Harnarain:

RE: Proclamation and Lighting Request – Canadian Premature Babies Foundation and World Premature Day Illumination Campaign – November 17, 2024

On behalf of the Town of Newmarket Council I am pleased to recognize November 17, 2024 as World Premature Day.

In addition, the Fred A. Lundy Bridge located on Water Street will be illuminated in purple on November 17, 2024 from sunset until 11:00 PM.

Thank you for submitting your request and for your contributions to the community.

Yours sincerely,

A handwritten signature in black ink that reads "John Taylor".

John Taylor
Mayor