

# AIRD & BERLIS LLP

Barristers and Solicitors

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December 10, 2014

## VIA COURIER, EMAIL AND RESS

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Natural Resource Gas  
Board File No. EB-2014-0274**

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We are counsel to Integrated Grain Processors Co-operative Inc. ("IGPC").

Pursuant to Procedural Order No. 3 dated December 3, 2014, please find attached the Interrogatories of IGPC for NRG.

If there are any questions, please contact the undersigned.

Yours very truly,

**AIRD & BERLIS LLP**



Scott Stoll

SAS/bm

cc: Applicant and Applicant's Counsel (*via email*)  
Case Manager, Khalil Viraney (*via email*)  
Board Counsel, Michael Miller (*via email*)

Attach

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**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Natural  
Resource Gas Limited for an Order or Orders approving or  
fixing just and reasonable rates and other charges for the  
sale, distribution, transmission and storage of gas effective  
October 1, 2014.

**INTERROGATORIES OF  
IGPC FOR NRG**

**Question #1**

Reference: Manager's Summary, Page 13 of 18, Foregone Distribution Revenue

Preamble: IGPC understands that NRG is seeking recovery for the delay in implementation of the new rates and wishes to understand the basis of this request.

Questions:

- (a) Please confirm rates were originally to be implemented on October 1, 2014?
- (b) Please confirm that NRG had been scheduled to file for a cost of service application prior to seeking and receiving permission from the Board to proceed with this IRM application.
- (c) Please confirm that NRG first notified the Board of its request to change filings on August 25, 2014, less than 6 weeks before implementation of rates was scheduled.
- (d) When did NRG decide it would not file a cost of service rate application?
- (e) How long does NRG expect a cost of service rate application require to prepare for filing?
- (f) Given the timing of events in Procedural Order No. 3, is NRG seeking any amendments to the Foregone Distribution Revenue and its recovery (3 months of revenue)? If so, please detail the changes, including amounts, and the assumptions supporting those changes.
- (g) If the Board does not approve recovery of any amount of the Foregone Revenue Requirement, what impact would that have on the services provided to ratepayers?
- (h) What is the basis for the allocation of the Foregone Revenue Requirement?

**Question #2**

Reference: Manager's Summary, Page 9 and 10, Stretch Factor

Preamble: IGPC wants to understand the basis for reduction in the stretch factor from 0.5% to 0.4%.

- (a) Please provide the stretch factors for each range of electricity distributors.
- (b) Please provide NRG's view of the purpose of a stretch factor.
- (c) Please detail NRG's OM&A costs for each year since its last cost of service application.
- (d) What efficiencies has NRG realized in its operations that warrant it decreasing its stretch factor?
- (e) Does the Settlement Agreement specify what occurs to the stretch factor when the mid-range electricity distributor stretch factor is amended?
- (f) Please provide the amount of regulatory cost associated with EB-2010-0018 recovered annually by NRG through the current rates.

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