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April 5, 2019

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**Sent By Electronic Mail and Overnight Courier and Filed Electronically on RESS**

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Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27th Floor, P.O. Box 2319  
Toronto, ON M4P 1E4 ([boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca))

Vancouver

New York

Dear Ms. Walli:

**Re: Interrogatories of EPCOR Natural Gas Limited Partnership**

**Re: EB-2018-0305: Application by Enbridge Gas Inc. for 2019 natural gas rates and other charges effective January 1, 2019**

Further to Procedural Order No. 2 dated April 1, 2019, please find enclosed the interrogatories of EPCOR Natural Gas Limited Partnership in the above proceeding.

Please do not hesitate to contact me if you have any questions.

Yours very truly,



Patrick G. Welsh

c (email only): Richard King, *Osler, Hoskin & Harcourt LLP*  
Bruce Brandell/Dana Bissoondatt, *EPCOR*  
Service List in EB-2018-0305

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, as amended (the “**Act**”);

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for 2019 natural gas rates and other charges effective January 1, 2019.

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**INTERROGATORIES OF  
EPCOR NATURAL GAS LIMITED PARTNERSHIP**

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**April 5, 2019**

**A-ENGLP-1**

**Ref:** Exhibit B1, Tab 1, Schedule 1, p. 40 and Appendix H

**Preamble:** Appendix H is filed in response to a commitment by Enbridge (in its 2017 ESM Proceeding (EB-2018-0131) to file evidence about the refined feasibility analysis approach for residential infill customers (p. 40).

Appendix H: (a) is said to apply to the “EGD Rate Zone”; (b) purports to address “key elements of the Company policy under the Community Expansion framework as approved by the Board in E-2016-0004 ...”; and (c) sets out Enbridge’s procedures and policies to comply with EBO 188.

Further, paragraph 10 on page 3 of 8 of Appendix H states that “Where the use of a proposed facility is dominated by a single large volume customer, it is conserved a dedicated facility for CIAC purposes.”

**Questions:**

- (a) Please advise whether this policy applies to the Union Rate Zone as well.
- (b) Please advise whether this policy would apply to customers connecting to transmission (as opposed to distribution) assets.
- (c) Could paragraph 10 noted in the preamble above apply to a “facility” connecting to a transmission (as opposed to a distribution) asset? Please provide a definition of “dominant customer”.