

VIA E-MAIL

April 27, 2019

Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

RE: EB-2018-0305 – Enbridge Gas 2019 Rates – FRPO.22 Request for Response

REQUEST & SUPPORT

We act on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”).

We are writing to request an answer to our inquiry FRPO.22. In that interrogatory, we were requesting information regarding the process that EGI has implemented to assess potential measurement errors at TCPL gate stations. These measurement errors could be a source of Unaccounted For Gas (“UAF”). Ratepayers have been concerned about minimizing UAF for some time resulting in an earlier settlement described below as part of the Settlement Proposal for 2018 rates¹:

(iii) Reporting on UAF

In the Settlement Proposal arising from the 2016 Earnings Sharing Mechanism proceeding (EB-2016-0142, Exhibit N1, Tab 1, Schedule 1, item 1(r)), Enbridge agreed to review potential metering issues that might be contributing to UAF, and to report on that review. Enbridge provided its reporting in this case in Exhibit D1, Tab 2, Schedule 4 and associated interrogatory responses, and indicated that its review is ongoing. Enbridge has agreed that it will maintain its commitments from the 2016 ESM Settlement Proposal in relation to UAF such that as part of its 2019 rate setting application, Enbridge will file evidence explaining the steps that have been taken to investigate and address UAF that may be associated with metering differences at gate stations. Enbridge’s evidence will address any reductions in UAF achieved to date from review of metering at gate stations, as well as plans for any future actions to address this item.

¹ EB-2017-0086 Exhibit N2 Tab 1 Schedule 1 Page 18 approved by the Board, Dec. 7, 2017.

While we respect that the cost consequences of Gas Supply will be considered and determined in a separate upcoming proceeding that will establish the cost of UAF, this original issue and inquiry goes to the volume differences which contribute to UAF. Further as outlined by the company in the current proceeding²:

Note that for customer billing purposes the unit rates developed to recover the cost of contracted storage and unaccounted for gas (i.e. distribution commodity) costs are added to the delivery rates and recovered through the delivery charges on customers' bills.

We trust that the above supporting references and clarification will assist the company in recognizing that the requested interrogatory is the subject of this proceeding. We request provision of the requested information by end of day April 30th to allow any clarification at the Technical Conference scheduled to start May 1st. We will respectfully submit our requested approach would reduce the risk of this matter requiring the time of a Board panel later in the proceeding.

Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. EGDRegulatoryProceedings - Enbridge Gas
M. Kitchen - EGI
Interested Parties -EB-2018-0305

² Exhibit B, Tab 1, Schedule 1, page 8, lines 3-5