



***PUBLIC INTEREST ADVOCACY CENTRE***  
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March 9, 2009

**VIA MAIL**

Ms. Kirsten Walli  
Board Secretary  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**EB-2008-0219**  
**Enbridge Gas Distribution Inc. 2009 Rates**

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC

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

**AND IN THE MATTER OF** an Application by Enbridge Gas  
Distribution Inc. for an Order or Orders approving or fixing  
rates for the sale, distribution, transmission and storage of gas.

**Phase 2**  
**Interrogatories of the Vulnerable Energy Consumers Coalition**

**Question #1**

**References: Exhibit C Tab1 Schedule 1 Pages1-6: Exhibit B Tab 6 Schedule 1**

- a) Please Update the Exhibits to indicate the actual December 31, 2008 Balances -both principle and interest and amounts to be cleared July 1, 2009.
- b) Provide details of the interest calculations shown in Ex B Tab 6 S1 as updated
- c) Confirm which Accounts are/are not proposed to be cleared July 1, 2009 and provide a schedule showing the details of the amounts to be cleared to each rate class and the associated rate riders
- d) If the DSM- related accounts for 2008 are not to be cleared indicate the best estimate of the timing for clearance of these.

**Question #2**

**References: Exhibit C Tab1 Schedule 2 Pages1-2 (IFRSCCDA)**

- a) Provide a copy of the Application for an Accounting Order for the IFRSCCDA
- b) What is the status of the Board's disposition of EGDs request?
- c) Provide references/copies of Board correspondence/direction on IFRS.

**Question #3**

**References: Exhibit C Tab1 Schedule 3 Pages1-2**

- a) Provide a summary of the range of labor rates (based on qualifications) resulting from the RFP for field operations. Compare this to the current (up to Dec 2008) contract(s).

- b) Did EGD conduct a review of other rates, such as those paid by Union Gas for similar services? If so provide the comparisons( based on the qualifications required by the contractors personnel (gas fitter etc))
- c) Given the current economic situation does EGD plan to reopen the negotiation of the hourly rates and charges for field services?
- d) Provide the detailed calculations of the current and proposed service charges based on the costs to provide each of the services (transportation, technician time/cost and EGD in house costs etc.)
- e) Is any of the Field Services providers a related party of EGDI, or are they fully independent of EGD? If the former please provide details of the relationship
- f) Why are base costs for services not reducing as a result of implementation of Envision? Please Discuss.
- g) Provide a Schedule of Historic (2003-2008) and forecast 2009 Revenues from Specific Service Charges.
- h) Why should the Board approve an increase in SCC and Other Revenue during the IRM period? Discuss the regulatory approach and precedents.

#### **Question #4**

**References: Exhibit C Tab1 Schedule 4 paras 7 and 8**

- a) Provide the detailed wording both in the Handbook and on customer bills in blackline format
- b) Compare the proposed changed wording to the similar wording used by Union Gas Limited and Natural Resource Gas (NRG)
- c) Provide a similar blackline version of the proposed changes in Ex B Tab 3 S 2 Part III Terms and Conditions Applicable to all services, Section F.
- d) Has EGD considered the submissions in EB-2008-0150 regarding the effective dates from which LPP charges are levied? If so provide the Company's position on this issue (if different from its final submission in EB-2008-0150)

#### **Question #5**

**References: Exhibit C Tab1 Schedule 5 Tables 1 and 2**

- a) Provide an update to Table 1 to reflect 2008 actuals and, if appropriate revisions to 2009-2014 forecasts
- b) Update Table 2 to show 2008 actuals and variances
- c) Add notes on 2008 Cost Variances to Budget

#### **Question #6**

**References: Exhibit C Tab1 Schedule 6 para 7 and 8 and Attachment 1**

- a) Provide the status of the CIS replacement and new go live date
- b) If the CIS “go live date” is changed how does this affect the forecast of IVA transactions for 2009? Provide the impact delay of a month up to a July 1, 2009 go live date in terms of # transactions and costs recovered.
- c) Recalculate the 30c fee for 2009 based on July 1, 2009 CIS go live date and revise Attachment 1 to show costs recovered with the revised fee.

### **Question #7**

#### **Reference: Exhibit C, Tab 1, Schedule 11**

- a) Discuss the advantages/disadvantages of a the procedure for the 2010 rates case that separates the filings for the IRM rate adjustment formula evidence and for non-rate related changes, similar to the Phase 1 and 2 issues in this proceeding? In particular discuss how to address the changes to other revenue resulting from various service and transaction fees.
- b) What is the earliest date at which Deferral and Variance accounts can be cleared based on actual year end balances