

Interrogatory Requests to Enbridge Gas Distribution From APPrO

1. New Services

References:

- EB-2007-0615, Exhibit B, Tab 1, Schedule 1 Page 18, Paragraph 43
- EB-2005-0551, Exhibit S, Tab 1, Schedule 1 Page 13, Paragraph 1.1(L)
- EB-2007-0630
- Ontario Power Authority (OPA) Clean Energy Standard Offer Program (CESOP)

Question:

Enbridge is requesting an Incentive Regulation (IR) period of 5 years.

- a. Please indicate what new services for gas fired generation Enbridge is contemplating making available during the IR period?
- b. Is Enbridge open to offering new services for generators during this IR period, and if so what process does Enbridge expect to follow to obtain input from existing and prospective generators in order to offer these services on a timely basis?
- c. Certain Non Utility Generator (NUG) contracts are likely to come due during the IR period.
 - i. Will NUGs have access to the same new services offered by Enbridge in the NGEIR proceeding?
 - ii. If not why not?
- d. Enbridge has noted that Enbridge will meet no later than March 31, 2009 with interested parties to discuss the experience with Rate 125 (and Rates 300, 315, and 316) and receive requests for further modifications of the service. Would Enbridge be open to expanding the scope of this consultation process to include other potential services for generators?
- e. The Board has initiated a process to look at certain aspects of electricity rates and other matters relating to Distributed Generation (DG). The OPA has also initiated a CESOP program for generation up to 10 MW. Some DG and CESOP initiatives will use natural gas to generate electricity at peak times of the day. These programs may require additional gas related services or features from the LDC to accommodate the new programs. Has Enbridge developed any services to accommodate these generation programs? If so please describe them, if not please indicate if Enbridge is prepared to work with generators to identify and implement new services that have similar features (such as access to high deliverability storage, pooling of nominations, and more frequent nomination windows) to the services that were implemented in the NGEIR process.

2. Impact on NGEIR Services

References:

- EB-2007-0615, Exhibit B, Tab 4, Schedule 1, Paragraph 16 - Natural Gas Fired Generation Challenges
- EB-2006-0551, Exhibit C, Tab 2, Schedule 4, Page 1, Paragraph 2 - Derivation of Rate 125 Charges – Delivery Charges
- EB-2006-0551, Exhibit C, Tab 3, Schedule 3, Rate 316
- EB-2005-0551 Enbridge Settlement Agreement

Question:

- a. Given Enbridge's proposal to implement a revenue cap for its customers, and the limited experience with Rate 125 to date, please describe how Rate 125 contract demand rate will be affected by the IR proposal over the Incentive Regulation period.
- b. Will this contract demand rate change if additional Rate 125 contracts are signed, and if so how?
- c. How will Rate 300 contract demand charges change under Enbridge's IR program?
- d. Rate 125 and Rate 300 also incorporate certain balancing fees. Please indicate how each of these fees is affected by Enbridge's IR proposal through time.
- e. Similarly please indicate how the contract demand rates may change for the cost based components of Rate 315 and the proposed Rate 316 service under Enbridge's IR proposal.
- f. On page 13 of the NGEIR Settlement Agreement, Enbridge indicates that the estimated cost of providing the additional nomination windows was between \$250,000 and \$750,000. Please indicate:
 - i. If these costs have been more accurately determined?
 - ii. How these costs might change based on Enbridge's IR plan over the term?
- g. In EB-2005-0551 Exhibit C, Tab 2 Schedule 4, paragraph 2, Enbridge notes the cost required to implement certain changes to its EnTrac system were expected to range from \$2.4 to \$4.0 million. These costs impact the Monthly Customer Charge.
 - i. Please indicate if these costs have been determined with more accuracy.
 - ii. Please indicate the impact on the Monthly Customer Charge.
 - iii. Also indicate how these costs may change as a result of the proposed IR plan.
- h. Enbridge notes in section 4 of the NGEIR Settlement Agreement that its new unbundled transportation and balancing services, Rates 300 and 315, will be limited due to having to implement a manual solution.
 - i. Please provide information as to the level of uptake for the service.
 - ii. Please indicate the overall status of conversion to an automated solution.

- iii. Please indicate Enbridge's plan to accommodate new generators or existing generators use of these services during the IR period.

3. Y Factor

Reference

- EB-2007-0615, Exhibit B, Tab 4, Schedule 1 Paragraph 1

Question:

- a. Please confirm that Enbridge's IR proposal provides sufficient access to capital to add facilities to service new generation projects, provided such projects meet Enbridge's economic tests.