

January 26, 2010

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File 10606.00040

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2701
2300 Yonge Street
Toronto ON M4P 1E4

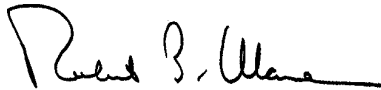
Dear Ms Walli:

Re: EB-2009-0172

We are counsel to the Consumers Council of Canada. On behalf of our client we enclose herewith its Written Interrogatories for Enbridge Gas Distribution Inc.

Yours very truly,

WeirFoulds LLP



Robert B. Warren

RBW/dh

cc: Enbridge Gas Distribution Inc.
Attention: N. Ryckman
cc: F. Cass
cc: D. Campbell
cc: C. Schuch
1999642.1

INTERROGATORIES FOR ENBRIDGE GAS DISTRIBUTION

FROM THE CONSUMERS COUNCIL OF CANADA

EB-2009-0172 – 2010 RATE PROCEEDING

1. (B/T1/S4/p. 1) Please indicate to what extent, if any the methodology for determining the customer additions forecast for 2010 differs from that used to develop the 2009 forecast. To the extent there are any changes, please explain why those changes were made.
2. (B/T1/S4/p. 1) Please explain when the forecast of customer additions was prepared. Did housing starts decline as expected in 2009? If not, please explain why the forecast of customer additions for 2010 remains appropriate.
3. (B/T1/S4/p. 7) Has EGD prepared an updated forecast of customer additions for 2010 relative to that provided on Table 2. If so, please provide.
4. (B/T1/S5/p. 11) Please explain, in detail, how the $13.7 \times 10^6 \text{m}^3$ adjustment for DSM initiatives was derived.
5. (B/T3/S1/p. 2) Please explain how the estimated annual benefit to ratepayers related to pension costs was derived. Please include all assumptions. Why is this a “benefit” to ratepayers.
6. (B/T3/S1, p. 6) The evidence states that the “meltdown” in financial markets over the past year was broad based and impacted virtually all segments of the economy. In addition, the evidence states that these events were clearly beyond the control of and could not have been reasonable foreseen by EGD’s management. How does EGD differentiate between ongoing changes that occur in the economy and the recent downturn? When economic conditions are better than expected at the time of a rate application, and load subsequently increases as a result, why shouldn’t EGD’s ratepayers get the benefit of all of that increased revenue?
7. (B/T3/S1) Please indicate when the most recent Mercer valuation will be completed.
8. (B/T3/S1/p. 6) Given the statement that the Company’s contribution requirements during 2010 may be significantly less than those which would have been required under the December 31, 2008 valuation, please provide evidence to

demonstrate that EGD has met the materiality threshold as set out in the IRM plan.

9. (B/T3/S2) Please indicate to what extent EGD's "Sewer Lateral Initiative" is being mandated by legislative or regulatory requirements. Please explain why these activities are not within the context of EGD's normal business requirements.
10. Please explain what relief EGD is seeking from in the panel with respect to the cost of capital. Please explain, how, if at all, EGD sees the Board's most recent cost of capital report impacting this application.