



PUBLIC INTEREST ADVOCACY CENTRE

LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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February 26, 2010

VIA E-MAIL/RESS

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

Dear Ms. Walli

**Re: EB-2010-0029 Enbridge Gas Distribution Inc. DSM Accounting Order
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed interrogatories on EGDIs Pre-filed Evidence.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC
Encl.

ONTARIO ENERGY BOARD
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 accounting order or orders
establishing certain Demand Side Management Deferral
Accounts for the years 2010-2014

Interrogatories on Behalf of the Vulnerable Energy Consumers Coalition (VECC)

VECC IR #1

Reference Exhibit A Tab 1 Schedule 3 Page 3 para. 7

Preamble:” In September of 2009 Enbridge submitted a proposal for a pilot project to field test and evaluate different solar thermal collector types and storage technologies in different configurations. In January of 2010, NRCan announced that Enbridge was one of 19 successful proponents from a field of 178 applicants”

- a) Provide a copy of the Application to NRCan, or alternatively a complete description of the project and multi year budget/financial proposal.

VECC IR #2

Reference Exhibit A Tab 1 Schedule 3 Page 4 para. 11

Preamble: The Solar Space Heating initiative is a pilot technology evaluation [emphasis added] to test a variety of solar thermal collectors and combined thermal storage alternatives. The pilot will involve the design and development of systems for a number of sites within the Enbridge franchise area. Following installation, the sites will be monitored for three years and the project results made publicly available.

- a) Position/discuss the Pilot Project and assets relative to the Boards Guidelines
“Regulatory and Accounting Treatments for Natural Gas Utility-Owned Qualifying

Facilities or Assets” and Specifically Facilities of Type c) in the Ministers Directive and Section 3.1 of the Guidelines.

- b) Discuss how this project differs from the SHSC Solar Water Heating Initiative EB-2009-0154 Phase II which the Board rejected.
- c) Will SHSC be one of the potential sites for the Multi-Residential demonstration project?

VECC IR #3

Reference: Exhibit A Tab 1 Schedule 3 Page 8 Paras 22 and 31

Preamble: “The project has similarities to the Industrial Sector Pilot Program approved by the Board in the 2010 DSM Plan (EB-2009-0154). Like the Industrial Pilot Program, the budget for the Solar Thermal Space Heating Pilot is proposed to be incremental to the DSM budget for 2010 as determined by the formulaic budget escalator detailed in EB-2006-0021, but still included in rates. Additionally, neither project will impact the formulaic DSM target, or contribute TRC results for the purposes of SSM calculation.”

- a) Confirm that the Solar Pilot costs /accts will be separated from the base DSM program for 2010-2012 and will not access the DSMVA or LRAMVA or SSMVA
- b) Will interest be charged on the account balance?

VECC IR #4

Reference Exhibit A Tab 1 Schedule 3 Page 9 para 25 and 26

Preamble: “The maximum anticipated budget is \$8.5 million over the five year duration of the pilot. As illustrated in the table below, most costs are incurred in Phase 2, Implementation, as the systems are purchased and installed.”

- a) If not already provided in the response to VECC IR #1 provide a budget breakdown by year (similar to para 26) that shows inter alia EGDs estimated gross and net Capital and O&M costs.

VECC IR #5

Reference: Exhibit A Tab 1 Schedule 3 Page 9 para 29 and 33

Preamble: “It is anticipated that, where appropriate, the Company will seek approval for the clearance of amounts recorded in a specific year’s deferral account at the same time that the Company applies for approval for clearance of the same year’s other DSM deferral and variance accounts”.

- a) Provide the Name(s) of the Account(s) for which approval is sought.
- b) Provide details of the Accounting Entries.

- c) Provide details of how the account(s) will be audited and provided to ratepayers as part of EGDs plan to recover the (net) balance in the Account (if approved):
 - i. During the IRM period
 - ii. Upon Rebasing
 - iii. Other recovery/timing
- d) How does EGD plan to allocate the costs to customers/classes assuming the board finds this appropriate? Provide details of the principles that will apply.
- e) Based on the preliminary estimate of costs and the sectoral project plan, provide an *illustrative* schedule that shows the potential allocation of the (net) costs to ratepayers.

VECC IR #6

Reference: Exhibit A Tab 1 Schedule 3 Page 12 para 34

Preamble: The Company welcomes any suggestions that members of the DSM Consultative may have at a future DSM Consultative meeting. Unfortunately, given the NRCan requirement that a Contribution Agreement be executed before March 31, 2010, and to provide sufficient time to allow for the processing of this Application it was not possible for the Company to seek input from the DSM Consultative prior to the filing of this Application.

- a) Provide a Copy of the Minutes/Notes on this topic from the February 17, 2010 DSM Consultative Meeting.