

VIA E-MAIL & RESS

May 28, 2010

Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

Attn: Kirsten Walli, Board Secretary

**RE: EB-2008-0106 Enbridge Gas Distribution MDV Proposal - FRPO Interrogatories**

Please find attached the interrogatories of the Federation of Rental-housing Providers of Ontario (FRPO) to Enbridge Gas Distribution in their MDV Proposal.

Respectfully Submitted on Behalf of FRPO,



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Principal  
DR QUINN & ASSOCIATES LTD.

**Enbridge Gas Distribution (EGD) MDV Proposal**

**Interrogatories of the Federation of Rental-housing Providers of Ontario (FRPO)**

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The periodic re-establishment of MDV would be applicable to all Pool types including both customers and agents, and would be an automatic process that cannot be deselected or opted out of. The MDV calculation and re-establishment process would occur monthly.

**Preface: We understand that the MDV re-establishment process will assist individual DPA's manage changes to Pool composition. At the same time, the more frequent adjustments to deliveries has the potential to leave pipeline capacity empty.**

1. What is EGD's plan to deal with unutilized long-haul pipe capacity generated from the sum of the changes?

- a) If the gas is not needed by the system gas pool, would EGD be considering allowing the pipe to go empty; attracting UDC costs? If so, how would those costs be allocated?
- b) If the gas is not needed by the system gas pool, would EGD be considering filling the pipe and selling the gas in the east? If so, would the incremental margin from re-sale go directly into the deferral account to reduce load balancing costs?
- c) How would any other incremental costs or benefits generated by MDV changes be allocated?

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In the absence of a Pool composition change, a variation in a consumer's actual consumption versus its original forecasted consumption, would not trigger the Pool MDV re-establishment process.

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Load balancing functionality for suspension requests will be limited to a maximum length of one month, but cannot cross over a month end. Each suspension request will be validated against the effective MDV of the respective month. The system will allow

for the editing of suspension/make-up requests up until two business days prior to the effective date. Makeup functionality is otherwise unaffected.

**REF: EB-2008-0106 Exhibit IR 10, Schedule 2, page 1 of 5 (IR Response to FRPO)**

As explained at the Technical Conference (Tr. p. 146 to 149) there is a crossfunctional team that meets on a regular basis to review near term projections of supply and demand, make decisions to adjust the levels of seasonal supply if necessary. This team reviews the BGA positions to determine if there is a need for suspensions and/or makeups. The team, after looking at the near term projections of supply and demand, determines whether we can offer suspensions and/or makeups without affecting storage targets and meeting customers' demands and establishes a level of suspensions and/or makeup that will be made available on a go forward basis which is then allocated to the DP customers on a first come first served basis.

**Preface: We understand the MDV proposal includes provision for MDV re-establishment when there is a change in Pool composition. For circumstances when actual volumes differ substantially from forecast and there is no change in Pool composition, EGD provides suspension or make-ups. With addition of algorithms to provide weather normalized forecasting, EGD will have enhanced data for determinations of the position of a Direct Purchase Account (DPA) relative to forecast.**

2. How will EGD use the additional data from the systems developed in this proposal in the determination of available room for suspensions or need for makeup on a total system basis?
3. Will the relative amount of difference between forecast and actual for an individual Direct Purchase Account provide increased priority for customers in greater need of adjustment (i.e., if a DPA is projected to be long by 40%, would that DPA have priority access to suspensions versus a DPA that is projected to be 10% long)?
4. Will EGD allow for allow for suspensions or makeups for individual DPA's if that DPA is projected to be out of tolerance even if the entire system is projected to be in tolerance with the gas supply plan? If so, is the threshold for approval a projection of +/- 5.5% difference or another number to justify adjustments to an individual DPA?