

IGUA INTERROGATORY #1

INTERROGATORY

[Reference: Filing Page 6] Enbridge Gas Distribution's (EGD) filing states that the cost for the proposed MDV implementation "...will be brought forward for clearing in a future proceeding, at which time interested parties will have an opportunity to examine the prudence and disposition of the account balance".

- (a) On what basis do the costs of this project qualify for pass through to ratepayers given the current IRM framework under which EGD is operating?
- (b) What is EGD's position on who should pay the costs of this project, and, as relevant, the basis upon which such costs should be allocated among proposed payors?
- (c) Please indicate, by rate class, the rate impacts of clearing the forecasted account balance if the costs are allocated to all distribution ratepayers.

RESPONSE

- a) The Board approved the re-establishment of the MDV in its EB-2008-0106 Decision as part of the generic review of Commodity Pricing, Load Balancing, and Cost Allocation Methodologies for Natural Gas Distribution. The EB-2008-0106 Decision was reached within the context of the existing IRM, recognizing that the initiatives affected by the decision are market enabling and upstream of the utilities' distribution function. The 2010 MDVMDA was subsequently created upon the Board's directive to record costs associated with the development and implementation of the MDV initiative. This approach is compatible with the Board's previous decisions on matters that are Board-initiated or market enabling, and ensure the utility and its customers are kept whole with respect to implementation costs.

Costs recorded in the 2010 MDVMDA will be brought forward for clearing in a future proceeding at which time interested parties will have an opportunity to examine the prudence and disposition of the account balance.

- b) and c) Please see the response to Board Staff Interrogatory #4 at Exhibit MDV IR24, Schedule 4.

Witnesses: I. Macpherson
B. Manwaring

IGUA INTERROGATORY #2

INTERROGATORY

[Reference: Filing page 10]

- (a) Please identify which of the line items on the Estimated Project Costs breakdown reflect external costs.
- (b) Please provide a breakdown of costs as between the functionality required to;
 - (i) calculate MDV on a weather normalized basis; and
 - (ii) re-calculate MDV during the contract term for multi-account customers.

RESPONSE

- (a) All costs detailed on page 10 reflect external costs.
- (b) (i) (ii) In the Board's Decision and Order Enbridge was directed to establish MDV on a weather normalized basis and to re-establish MDV during the contract term when necessary. Enbridge's estimate for implementation of this solution is integrated based on implementing the complete set of requirements ordered by the Board and as such no cost breakdown as requested is available.

Witnesses: I. Macpherson
B. Manwaring

IGUA INTERROGATORY #3

INTERROGATORY

[Reference: Filing page 10] The Estimated Project Costs breakdown provided at Appendix B indicates a cost of \$615,000 for "Contract Backfills for EGD Staff".

- (a) Please identify the positions to be engaged in this project which require backfilling.
- (b) Please explain why existing EGD resources are insufficient to implement this relatively modest project.
- (c) Please detail, for each position to be backfilled, the nature of the work that the individuals contracted to backfill will undertake.

RESPONSE

- a) Enbridge's plan includes backfill for the following positions during the MDV Project: Two Business System Support Analysts for the EnTRAC system, one Contract Compliance Supervisor and one Contract Relationships Supervisor. Note that not all the business resources participating in project activities will be backfilled.
- b) Enbridge operates the Direct Purchase business with a fully utilized staff to maintain system production, routine operations and customer support functions at the lowest possible cost. The MDV Project, which may appear modest compared with other larger initiatives is substantial and will require considerable effort and human resources investment to successfully implement the required changes in the Board ordered timeline. Further the employees seconded to the project, for which back filling has been designated would not be able to fulfill their current responsibilities.
- c) The resources acquired to backfill for the seconded Business Systems Support Analysts, will be performing the same responsibilities as the resources for whom they are backfilling. Their responsibilities include but are not limited to, EnTRAC user support, user system access requests and terminations, potential system defect and issue investigation and resolution, system change management and quality assurance testing, and monthly control checks such as monitoring the successful data flow between interfacing systems such as the billing system.

Witnesses: I. Macpherson
B. Manwaring

Backfilling functions for the Supervisor of Contract Relationships will be involved in but not limited to, gas vendor support, billing defect resolution, EnTRAC technical assistance request prioritization, and contract administration support.

Backfilling functions for the Compliance Supervisor will predominantly be the monthly clerical functions associated with Contract Compliance programs such as Firm Transportation Turnback verification, Firm Transportation Assignment entries (to TCPL), monthly reporting (generation and distribution), and ongoing Curtailment program administration.

Witnesses: I. Macpherson
B. Manwaring