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Toronto, May 27, 2011

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

Dear Ms. Walli:

**RE: Enbridge Gas Distribution Inc. (“Enbridge”)
2010 Earnings Sharing Mechanism and Other Deferral and Variance Accounts
Clearance Review (EB-2011-0008)
Interrogatories of Association of Power Producers of Ontario (“APPrO”)**

Please find attached the information requests of APPrO to Enbridge in the above-noted proceeding.

Yours very truly,

“Signed”

John Beauchamp

JB/mm

Encls.

cc: All parties to proceeding
David Butters (*APPrO*)

ASSOCIATION OF POWER PRODUCERS OF ONTARIO**INTERROGATORIES TO EGD**

1. Reference: Exh A, T2, S1, App A – Re: Unbundled Rate Implementation Cost D/A (2010 URICDA)

- (a) Please confirm that EGD first requested approval for the establishment of the URICDA in the Board's NGEIR proceeding. If not, please indicate when approval for the establishment of the URICDA was first sought.
- (b) Please provide a copy of the OEB approval of the establishment of the URICDA along with any documentation associated with it (including the Decision with Reasons in EB-2005-0551 dated November 7, 2006, with Appendices).

2. Reference: Exh C, T2, S2, Page 8, Footnote **:

We note that there is the following description in the footnote on pg. 8 of Sch 2. “** The Company incurred \$78.9 k in additional staffing costs in 2010 associated with the additional upstream (such as FT-SN) nomination windows for unbundled customers. As specified in the NGEIR Settlement Agreement (EB-2005-0551 Ex S T1 S1 p13), the costs are to be recovered from the parties who availed of the service. Three customers on Rate 125 utilized the additional nomination windows in 2010 and the costs were allocated equally among the three customers.”

- (a) Please provide the reference to any other information included in the application that is intended to explain the URICDA.
- (b) Please provide a detailed description of the nature of the “additional staffing costs” referred to above. In particular:
 - (i) Are these costs associated with incremental staff hired to perform this function?
 - (ii) Please provide in detail the functions associated with the “additional staffing costs” & explain how they are incremental to the staffing costs included in EGD's overall rates.
 - (iii) Enbridge is also a significant FT-SN shipper on TCPL and the capacity is used for this system supply, and also makes additional nominations in order to effectively utilize the capacity. Please detail how the proportion of the additional costs incurred is related to and has been allocated to system supply.
 - (iv) What is the basis to pass on these additional costs incurred in the context of the IRM?

3. Reference: Exh C, T2, S2, Page 4

- (a) Please provide the details behind the \$145,500 cost shown in Item No. 7.
- (b) Please explain how the amounts in column 9 are allocated to Rate 125.

4. Reference: Exh C, T2, S2, Pages 7 & 8

- (a) Please provide the details of the derivation of the rates for Rate 125 on each schedule.
- (b) Footnote * on each page states that the “Unit Rates are derived based on 2010 actual volumes.”
 - (i) Are the unit rates on these pages demand charges or commodity charges for Rate 125?
 - (ii) Please provide the total contract demand volumes and total throughput volumes for the Rate 125 customers.