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October 31, 2011

BY EMAIL & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2011-0277
Enbridge Gas Distribution Inc. – 2012 Rates Adjustment
Energy Probe – Interrogatories

Pursuant to Procedural Order No. 1, issued on October 13, 2011, please find the Interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2011-0277 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc: Norm Ryckman, Enbridge Gas Distribution Inc. (By email)
Fred D. Cass, Aird & Berlis LLP (By email)
Randy Aiken, Aiken & Associates (By email)
Intervenors of Record (By email)

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an Application by Enbridge Gas
Distribution Inc. for an Order or Orders approving or fixing just
and reasonable rates and other charges for the sale, distribution,
transmission and storage of gas commencing January 1, 2012.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

October 31, 2011

**ENBRIDGE GAS DISTRIBUTION INC.
2012 RATE ADJUSTMENT
EB-2011-0277**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Interrogatory #1

Ref: Exhibit B, Tab 1, Schedule 2, paragraph 7, Updated

Please confirm that the 2012 DSM operating budget of \$30.9 million has been updated to \$28.1 million as shown in the updated table shown on page 1.

Interrogatory #2

Ref: Exhibit B, Tab 1, Schedule 4, Table 2

Please show the customer additions in 2011 based on the most recent month of actual data available relative to the same month in 2010 in the same level of detail as shown in Table 2.

Interrogatory #3

Ref: Exhibit B, Tab 1, Schedule 5, Figures 1 & 2

- a) Do the 2011 estimates shown in Figures 1 & 2 include any months of actual normalized use?**
- b) Please update the 2011 estimates shown in Figures 1 & 2 to reflect as many months of normalized actual data as currently available.**
- c) For each of the 2011 estimates shown in Figures 1 & 2 please provide the most recent year-to-date normalized average use available for 2011 and for the same period in 2010.**

Interrogatory #4

Ref: Exhibit B, Tab 1, Schedule 5, Table 1

- a) How many months of actual data are included in Table 1 for 2011?**
- b) Please provide an updated version of Table 1 that reflects as many months of actual data as are currently available for 2011.**

Interrogatory #5

Ref: Exhibit B, Tab 3, Schedule 1, pages 6-8

- a) Are the allocators used for the 2012 Y factors consistent with the allocators used for 2011 and previous years? If not, please explain any differences.**
- b) Please provide a table showing the allocations of the 2012 DRR and 2011 DRR to confirm that these allocations are very similar.**
- c) Did EGD consider other allocation factors for the Z factors? If so, please explain what was considered and why they were not used.**
- d) Is the allocation of the pension funding requirement consistent with how the cost would have been allocated in 2007 if it had existed? If not, please explain the difference.**
- e) Is the allocation of the cross bore costs consistent with how the cost would have been allocated in 2007 if it had existed? If not, please explain the difference.**

Interrogatory #6

Ref: Exhibit B, Tab 2, Schedule 6, page 17

Is the cross bore safety issue a risk for which EGD would take risk mitigation steps?

Interrogatory #7

Ref: Exhibit C, Tab 1, Schedule 4, page 2

- a) Where has EGD reflected the impact of the elimination of the small business surtax claw back effective July 1, 2010 on the first \$500,000 of taxable income?**
- b) Please confirm that the reduction for the provincial small business deduction in 2012 is equal to a reduction from 11.25% to 4.5% on the first \$500,000 of taxable income, or \$33,750.**
- c) Did EGD reflect this tax reduction in the calculations for previous years? If not, why not?**

Interrogatory #8

Ref: Exhibit E, Tab 3, Schedule 1

Please provide the appendix to the exhibit based on the October 2011 Consensus Forecasts.