

**INTERROGATORIES FOR ENBRIDGE GAS DISTRIBUTION
FROM THE CONSUMERS COUNCIL OF CANADA
EB-2011-0277 - 2012 RATE ADJUSTMENT**

1. Please indicate if EGD has changed in any way the way in which it forecasts customer additions and average use relative to the last rate adjustment proceeding. If there have been changes please explain what they are, and the rationale for the changes.
2. (B/T2/S5/p. 3) Please explain, in detail, how EGD's ratepayers have benefited from the current pension reporting requirements.
3. (B/T2/S5/p. 4) Pension costs are a cost of operating the distribution business. Please explain why EGD's management has not been able to "control" this cost. Please explain why EGD has not been able to "manage a growing pension obligation due to employee services rendered."
4. (B/T2/S5/p. 8) Please provide on an annual basis for the years 2007-2011 the extent to which EGD's long term and short-term debt costs (embedded in rates) have varied from its actual debt costs.
5. (B/T2/S6) Please provide any correspondence between EGD and Union Gas regarding Cross Bores/Sewer laterals. Specifically, please provide any correspondence between the two companies regarding Z-factor treatment of these costs.
6. (B/T2/S6/p. 5) What has been the cost to EGD of repairing the 44 sewer laterals? What has been the number of these repairs in each year since 2007?
7. (B/T2/S6) For 2011 was the projected cost set out in EGD's 2011 rate adjustment application and what are the actual costs to date?
8. (B/T2/6/p. 13) Please provide a detailed explanation as to how the \$2.377 million in was calculated. Please provide all assumptions.
9. (B/T2/S6) What is the projected annual cost to deal with the Cross Bore/Sewer Lateral issue for the next 5 years?