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**By electronic filing**

November 3, 2011

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms Walli,

**Enbridge Gas Distribution Inc.**  
**2012 Rates Application**  
**Board File No.: EB-2011-0277**  
**Our File No.: 339583-000117**

We enclose the Interrogatories of Canadian Manufacturers & Exporters ("CME") for Enbridge Gas Distribution Inc. ("EGD").

In posing these questions, we have attempted to refrain from duplicating questions already posed by Board Staff, the Vulnerable Energy Consumers Coalition ("VECC"), and the Building Owners and Managers Association of Toronto ("BOMA").

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Peter Thompson', is written over a horizontal line.

Peter C.P. Thompson, Q.C.

PCT\slc  
enclosure

c. Norm Ryckman (EGD)  
Fred Cass (Aird & Berlis LLP)  
Intervenors in EB-2011-0277  
Paul Clipsham (CME)

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**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  
CANADIAN MANUFACTURERS & EXPORTERS ("CME")  
TO ENBRIDGE GAS DISTRIBUTION INC. ("EGD")**

**FORECAST OF CUSTOMER ADDITIONS**

**Reference:** Exhibit B, Tab 1, Schedule 2, page 1  
Exhibit B, Tab 1, Schedule 4

1. Assume that each of the categories of Customer Additions used by EGD in its forecast has been underestimated by 5%. Please provide a schedule that will show the sensitivity of the 2012 delivery Revenue Requirement of \$839.99M, shown at line 18 of Exhibit B, Tab 1, Schedule 2, page 1, to this reduced level of Forecast Customer Additions.
2. To what extent, if any, would the delivery rate impacts, shown at Exhibit B, Tab 3, Schedule 1, page 3, change with the foregoing reduced level of Forecast Customer Additions.

**POWER GENERATION Y FACTOR**

**Reference:** Exhibit B, Tab 2, Schedule 1, page 1; Appendix A, pages 1 to 5

3. Is the list of Power Generation facilities described in paragraph 3 of Exhibit B, Tab 2, Schedule 1, at page 1 complete? If not, then list any other Power Generation facilities that fall within the ambit of the Y factor.
4. For each of the facilities that fall within the ambit of the Y factor, please provide details of the delivery service each facility acquires from EGD, and provide a schedule that will show the annual revenues that EGD has either received or expects to receive from each facility for each of the years 2008 to 2020 inclusive.
5. Are all of the revenues EGD receives from each of the power facilities that fall within the ambit of the Y factor included in the Revenue Requirement calculations found at Exhibit B, Tab 2, Schedule 1, Appendix A, pages 1 to 5? If not, then please provide the rationale for their exclusion.
6. What economic feasibility analysis did EGD conduct with respect to its attachment of each of these Power Generation projects? For each facility, please provide calculations showing the Profitability Index ("PI") that results from an economic feasibility analysis of the attachment of each facility. Please include therein the time horizon used to evaluate the economic feasibility of attaching each facility to EGD's distribution network.

## **2012 PENSION FUNDING Z FACTOR**

**Reference:** Exhibit B, Tab 2, Schedule 5, and Appendices

7. The evidence indicates that a regulation was introduced in June 2009 requiring plan sponsors to file an annual actuarial cost certificate. Please provide a copy of that regulation and the date that it went into effect if that date is other than June 23, 2009.
8. What is the filing deadline for the certificate that is to be prepared as of December 31, 2011?
9. If the filing deadline of the certificate triggers the need for an annual contribution, then what is the latest date on which that annual contribution can be made? For example, if the certificate filing deadline is March 31, 2012, can the required contribution amount be paid in March 2013?
10. Please list the differences between the Mercer Reports of September 29 and October 3, 2011, respectively, filed at Exhibit B, Tab 2, Schedule 5, Appendix B and explain why the second report was produced four (4) days after the first report.
11. Please identify each of the companies that participate with EGD in the pension plans described in paragraph 3 of Exhibit B, Tab 2, Schedule 5 at page 1.

## **CROSS-BORES Z FACTOR**

**Reference:** Exhibit B, Tab 2, Schedule 6

12. Please describe what action EGD expects the Technical Standards and Safety Authority (the "TSSA") to take in response to its submission of an action plan to the TSSA for inspection by October 31, 2011. More particularly, what is the anticipated outcome of that inspection?
13. Having regard to the evidence that the potential for a natural gas pipeline, during trenchless construction, to penetrate a sewer line is not new and that EGD has been managing the problem for several years, please provide, for each of the years 2007 to 2011, inclusive the frequency of calls EGD received from plumbers, homeowners and others who had a blocked sewer line beyond the walls of the building and describe the action EGD took in response to such calls.
14. What is involved in performing a sewer lateral locate prior to construction? Over the years, how frequently has EGD conducted sewer lateral locates prior to construction?