

**IN THE MATTER** of the *Ontario Energy Board Act 1998*, Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an Order or Orders approving just and reasonable rates and other service charges for the sale, distribution, transmission and storage of natural gas, effective on October 1, 2012.

**INTERROGATORIES**  
**OF THE**  
**SCHOOL ENERGY COALITION**

1. [B/1/3, p. 1] Please confirm that the depreciation rates used to calculate line 9 are unchanged between 2007 Board approved and 2011 actual. If there are any changes, please provide details.
2. [B/1/4, p. 3] Please provide details of the revenues and costs associated with the ABC program. Please confirm (and disaggregate) the gross revenues of \$5.9 million and the total costs of \$1.8 million and the resulting profit before tax of \$4.1 million.
3. [B/1/5, App. 1, p. 11] Please confirm that costs for replacement assets with enhancements are allocated to unregulated on an incremental cost basis. Please provide the total dollar amounts (gross and unregulated allocation) allocated in this way in each of the last four years, and the cumulative total assets allocated this way as of 2011. Please provide a reference for the Board decision or other basis on which incremental costing is used for this allocation.
4. [B/1/5, App. 1, p. 12] Please confirm that the overhead percentage and calculation method used to allocate to the unregulated business is identical in all respects to a) the allocation of overheads within the Applicant's regulated business, and b) the allocation of overheads between Enbridge Inc. and its affiliates. If there are differences in the methods or percentages please provide details.
5. [B/1/5, App. 1, p. 14] Please provide side by side profit and loss statements for the regulated and unregulated storage businesses for 2011.

Respectfully submitted on behalf of the School Energy Coalition this 13<sup>th</sup> day of July, 2012

---

Jay Shepherd