



**PUBLIC INTEREST ADVOCACY CENTRE**

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July 13, 2012

**VIA E-MAIL/RESS**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor; 2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Re: EB-2012-0055 Enbridge Gas Distribution Inc.**  
**Application for Approval of 2011 ESM and Deferral Account Disposition**  
**Interrogatories on behalf of the**  
**Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed VECC's interrogatories to the Applicant regarding the above Application.

Yours truly,

*Original signed*

Michael Buonaguro  
Counsel for VECC

Encl.

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

**AND IN THE MATTER OF** an Application by Enbridge Gas  
Distribution Inc. for an Order or Orders approving the  
clearance or disposition of amounts recorded in certain  
deferral or variance accounts..

**EGDI Earnings Sharing for 2011  
Deferral Account Disposition**

**Information Requests of the  
Vulnerable Energy Consumers Coalition (VECC)**

**General**

**VECC IR #1**

Reference: Exhibit B, Tab1, Schedule 3, line 15 and footnote 1

- a) Please provide the calculation of the ROE established for the 2011 ESM.
- b) Please provide the reference(s) for the approved ROE for use in 2011 ESM.

**VECC IR #2**

Reference: Exhibit D, Tab 1 and 2 - Reference Material

- a) Please also file the Annual Information Form for Enbridge Gas Distribution Inc. for the year ended December 31, 2011.

**2011 ESM**

**VECC IR #3**

Reference: Exhibit B, Tab 4, line 16

- a) Provide the CAM amounts for 2007-2011 and forecast 2012-2013,
- b) Confirm the agreed 2011 amount between EGDI and Enbridge Inc was \$43.44 million,
- c) Provide a variance explanation for the increase in CAM amounts 2010-2011,
- d) Provide the actual and estimates for SBC costs for 2011, 2012 and 2013.

#### **VECC IR #4**

References: Exhibit B, Tab 1, Schedule 3, Page 2, Paragraph b)  
Exhibit B, Tab 3, Schedule 5, line 1.3  
Exhibit B, Tab 2, Schedule 2, Page 1, Line 8

- a) Provide actual LPP revenue for 2007-2011,
- b) Provide an explanation for the 2011 LPP variance, including any changes in policy,
- c) Provide an explanation of the change in customer security deposits 2010-2011,
- d) Discuss changes to customer service rules and the potential impact on LPP revenue and Security Deposits 2012-2013.

#### **VECC IR #5**

References: Exhibit B, Tab 1, Schedule 5, Page 4 Para 12: Exhibit B, Tab 1, Schedules 1&2

Preamble:

Enbridge has looked at the 2011 O&M cost sharing that would have resulted had it been using this revised methodology. The resulting allocated amount would have been about \$1.6 million or about 15 percent higher than the \$1.4 million that had been allocated using the current methodology.

- a) Does EGD I agree that by accepting the 2011 ESM adjustment to Storage O&M of \$1.6 million, intervenors do not necessarily accept the changes to storage cost allocation recommended by B&V on a going forward basis for 2012/13 and beyond?
- b) Does EGD I agree that a full examination of the matter should occur in the 2013 Rebasement and Rate Application?
- c) Point to the adjustments made to Exhibit B, Tab 1, Schedules 1&2.

#### **VECC IR #6**

References: Exhibit B, Tab 1, Schedule 5, Plus Appendices -Storage Activities:  
Exhibit B, Tab 1, Schedule 5, Appendix II -Allocation of Storage O&M Costs  
Exhibit D2, Tab 5, Schedule 1.

- a) In the second reference, provide an explanation of the 2011 increase in regulated storage from 98.0 to 98.4 Bcf.
- b) Provide an explanation for the reduction in Direct unregulated storage allocated costs given the 4.7 Bcf increase in Capacity.

## **VECC IR #7**

Reference: Exhibit B, Tab 4, Schedule 2, Page 1

- a) Provide (more) explanations for the following material changes
  - i. Provision for Uncollectables (line 5)
  - ii. Human Resources (line 11)
  - iii. Public and Government Affairs (line 14)
  - iv. Corporate Allocations (line 16)

For each variance indicate the 2012 estimate and indicate whether the 2012 level of expense is continued in 2013.

- b) Show the following for 2007-2011:
  - i. CAM amounts
  - ii. RCAM amounts
  - iii. RCAM Amount Recovered from Ratepayers(Residual after Eliminations)

## **Deferral Account Balances and Disposition**

## **VECC IR #8**

Reference: Exhibit A, Tab 2, Schedule 1, Appendix

- a) Please provide a schedule that lists the accounts and associated balances that have already been approved for clearance. Include reference to Board Order(s).
- b) For those DVAs approved ,but not cleared, please provide a schedule that shows the carrying costs from the date of approval to the date of (actual or proposed) clearance.
- c) Provide explanatory Notes.

## **VECC IR #9**

References: Exhibit A,Tab2,Schedule 1, Appendix Line 6: Exhibit C, Tab1, Schedule 2

- a) Please provide a schedule that shows all of the activities and costs recorded in the 2011 GDARCD A
- b) Explain the calculation of the amount of \$2,758.1 million scheduled for clearance in the first reference to the 2011 closing balance of (\$2,904.4million ) shown in the second reference
- c) Update the status of the amendments to the Customer Service Rules for residential and residential low income customers.
- d) What were the costs incurred for these latter amendments and indicate if these are included in the schedule in the response to part a).

### **VECC IR # 10**

Reference: Exhibit A, Tab 2, Schedule 1, Appendix, line 22

- a) What is EGDI's Plan for review of the details of the transactions and revenue related to the 2011 TSDA?
- a) Provide the composition of the TS and TSDA amounts and the basis for the adjustment to utility revenue.
- b) Compare/contrast to 2010.

### **VECC IR # 11**

Reference: Exhibit A, Tab 2, Schedule 1, Appendix, line 23

- a) What is EGDI's plan for review of the details related to the 2011 UAFVA?
- b) Provide the composition of the UAFVA amounts.

### **VECC IR # 12**

Reference: Exhibit C, Tab 1 Schedule 4 Page 4 plus Appendix A

- a) Provide details of the 2011 Weather and the impact on average use for Rates 1 and 6.
- b) Provide version of Tables 4 and 5 that compares the actual normalized volumes for Rate 1 and Rate 6 to Budget/forecast.
- c) Reconcile to 2011 Rate 1 and rate 6 AUTVA calculation schedule.