

07 September 2012

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Attn: Ms Kirsten Walli
Board Secretary

By electronic filing and e-mail

Dear Ms Walli:

Re: EB-2011-0354 EGDI Rates – GEC IRs on Open Bill

Pursuant to Procedural Order No. 4 GEC submits the attached interrogatories on Open Bill issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David Poch", with a stylized flourish at the end.

David Poch

Cc: Enbridge

Before the Ontario Energy Board

Enbridge Gas Rates Commencing January 1, 2013

GEC Interrogatories

Issue: Open Bill Issue D11 – Evidence Ref. D1/Tab 9/Sched.1:

1. What goods or services are currently eligible or ineligible and/or proposed for open bill?
2. Are there energy efficiency constraints on open bill eligible goods and services at present or proposed?
3. Please provide a breakdown of the nature of goods and services billed via open bill in the most recent year for which such data is available. Please include any information on the energy efficiency of products compared to code, and/or compared to current market average efficiency.
4. When does EGD's contractual obligation to Direct Energy to offer billing services end?
5. Please estimate the impacts if open bill were limited such that new items being billed (or a significant component of same) must offer significant energy efficiency improvement (or be ancillary to such improvements)? In answering this, assume that existing accounts (i.e. for products already sold) could continue to be collected whether they meet that criterion or not.
6. Would EGD agree that limiting Open Bill to bundles of services and products that include significant energy efficiency improvements would encourage Billers to promote such products? Does the company agree that it would give such products a marketing advantage? Does the company expect that it could obtain financing for such customers at a rate that would give such products a cost advantage?
7. Does EGD agree that on-bill financing of energy efficiency improvements would be a cost-effective way to encourage more efficiency, to assist customers with modest capital availability, and to do so with little or no cost to other ratepayers?