

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, c. 15 (Schedule 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.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

July 4, 2013

**ENBRIDGE GAS DISTRIBUTION INC.
2012 DEFERRAL AND VARIANCE ACCOUNTS & EARNINGS SHARING
EB-2013-0046**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Interrogatory #1

Ref: Exhibit A, Tab 2, Schedule 1, paragraph 6

The evidence states that the earliest feasible opportunity for clearance of the 2012 ESMDA and other deferral and variance accounts is at the time of the January 1, 2014 QRAM filing.

- a) Does EGD propose to include interest carrying costs through to the end of 2013?**
- b) What is the impact on the amount to be recovered/refunded to ratepayers of this proposal as compared to the amount that would be recovered/refunded if clearance of the accounts would have been possible at the time of the October 1, 2013 QRAM filing?**

Interrogatory #2

Ref: Exhibit B, Tab 1, Schedule 1

- a) Please confirm that the escalation factor approved in EB-2011-0277 for 2012 was 0.77% based on a GDP IPI FDD of 1.72% and an inflation coefficient (allowed % of GDP IPI FDD) of 45%.**
- b) What level would the escalation factor have had to be in 2012 to reduce the normalized return on equity from 9.570% to the benchmark ROE of 7.52%?**

Interrogatory #3

Ref: Exhibit B, Tab 1, Schedule 1

Has EGD made any changes to the way that the earnings sharing amount has been calculated for 2012 from the methodology used for 2011 in EB-2012-0055? If yes, please describe the change(s) and why the change(s) was (were) made.

Interrogatory #4

Ref: Exhibit B, Tab 1, Schedule 3

Please show the calculation of the 7.52% based on the Board approved formula using the October 2011 consensus forecast.

Interrogatory #5

Ref: Exhibit B, Tab 4, Schedule 1, page 7

- a) Please confirm that the opening CCA balances shown in column 2 are the actual final ending 2011 utility UCC balances from the 2011 tax return, adjusted to take account of non-utility related adjustments.**
- b) Please explain the differences between the opening CCA balances shown for 2012 with the UCC Carry Forward figures for 2011 shown in Exhibit B, Tab 4, Schedule 1, page 7 of EB-2012-0055. For example, please explain why the opening balance in CC Class 50 is shown as \$7,943,625 for 2012, when the UCC Carry Forward at the end of 2011 was \$12,646,065.**

Interrogatory #6

Ref: Exhibit C, Tab 1, Schedule 2

- a) Please explain and show the calculation and assumptions used to arrive at the reduction in gas sales of \$915.6.**
- b) What was the amount recovered by EGD in EB-2012-0055 related to the partial GDARCD A revenue requirement?**

Interrogatory #7

Ref: Exhibit C, Tab 1, Schedule 6

- a) Please provide a break out of the transactional services revenues for each of 2009 through 2012 into the types discussed at pages 10 through 18.**
- b) Please explain the difference in base exchange revenues of \$3.82 shown in Table 4 and the exchange revenue of \$20.8 shown in Appendix B.**

- c) For each of the types of transactional services discussed, please indicate what assets are used to generate the service, such as upstream transportation contracts, EGD pipeline assets, etc. For each asset used, please explain how the costs of these assets are recovered from ratepayers and which ratepayers pay for them (for example, all ratepayers through delivery rates, or gas supply customers only through the commodity cost of gas).
- d) What would be the impact on the amount to be credited to ratepayers if EGD applied the EB-2012-0055 Decision to the revenues generated in 2012? Please show all calculations and assumptions.
- e) What is the impact on EGD's shareholder if EGD were to apply the EB-2012-0055 Decision to the revenues generated in 2013? Please show all calculations and assumptions.

Interrogatory #8

Ref: Exhibit C, Tab 2, Schedule 1

Did EGD consider any other allocation methodology for the TIACDA balance? If so, please explain what it was and why it was rejected in favour of the DRR.

Interrogatory #9

Ref: Exhibit C, Tab 2, Schedule 2

Has EGD made any changes to the allocation of the various deferral and variance accounts to the rate classes from what has been approved by the Board in the past, other than the proposal related to the TIACDA account? If yes, please explain the difference and the reason for the change.