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 January 1, 2014.

INTERROGATORIES

OF THE

SCHOOL ENERGY COALITION

1. [A/2/1, App. A] Please provide a link to the application in EB-2013-0075, or advise when that application is expected to be filed. Please confirm that the Applicant is seeking clearance in this proceeding of the 2011 SSMVA, the 2011 DSMVA, and the 2011 LRAMVA, on an interim basis only, subject to true-up by the order set out in EB-2013-0075. If that is not the case, please advise the correct legal characterization of the order the Applicant is seeking in this proceeding with respect to those accounts.

2. [B/4/2, p. 1] Please restate this table showing, where any function has been shifted to or from line 16, Corporate Cost Allocations, the impact of that shift on each affected line.

3. [C/1/5, p. 1] Please provide a decision or settlement agreement reference for the $3 million reduction in the OHCVA threshold.

4. [C/2/1, p. 2] Please confirm that none of the pension benefits costs included in the TIACDA relate to labour costs that are capitalized for regulatory purposes. If any of those pension benefits costs are capitalized, please advise how the underlying capitalized labour costs are allocated for cost allocation purposes.

5. [D/1/1, p. 5] Please confirm that controllable expenses (Expenses less Earnings Sharing) increased over the two years from 2010 to 2012 by 9.03% (from $742 million to $809 million). Please provide a list of the material cost drivers causing this increase.

6. [D/1/1, p. 11] Please confirm that the election to use push-down accounting has no impact on the earnings sharing amount, or any of the deferral or variance account balances, in 2012. If there were any such impacts, please provide a detailed calculation of those impacts. (For greater certainty, please confirm that the earnings to be shared with ratepayers would be the same whether or not push-down accounting was being used.)

7. [D/1/1, p. 11, 29] Please confirm that when "the Company refined the methodology by which it determines discount rates" in 2012, that change had no impact on the earnings sharing amount, or any of the deferral or variance account balances, in 2012. If there were any such impacts, please provide a detailed calculation of those impacts.

8. [D/1/1, p. 18] Please provide an explanation, with calculation details, of the operating costs that are capitalized for regulatory purposes and would not be capitalized "in the absence of rate regulation".

9. [D/1/1, p. 21] Please provide details of the cost, including interest, standby fees, and other costs, of the "Commercial Paper and credit facility draws", and details of the negative cost, including interest, fees and costs paid and received, of "Short-term borrowings".

10. [D/1/1, p. 24] Please provide a table for the years 2007-2012 showing the number of Incentive Stock Options and Performance Based Stock Options outstanding at the beginning of the year, the options granted during the year, the options exercised during the year, and the number outstanding at the end of the year.

11. [D/1/2, p. 6] Please provide an evidence reference showing where the $5 million of capital gains taxes on the sale of the Amherstburg project have been grossed-up and deducted from costs for the purposes of calculating earnings sharing.

Respectfully submitted on behalf of the School Energy Coalition this 5th day of July, 2013

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Jay Shepherd