

VIA E-MAIL & RESS

July 20, 2013

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Attn: Kirsten Walli, Board Secretary

RE: EB-2013-0046 Enbridge 2012 Deferral and Variance Accounts- FRPO Submissions

We are writing in response to Enbridge's Interrogatory Responses filed July 19th. Given the tight time line between these responses and the impending Settlement Conference with no opportunity for a Technical Conference to seek better understanding, we are submitting the following questions for a more fulsome response. Our hope is that Enbridge will answer these questions prior to the start of our settlement discussions to allow the two days afforded to focus on negotiating a settlement as opposed to seeking a better answers to our questions.

REF: EB-2013-0046, Exhibit I, Tab 7, Schedule 5 and 7

FRPO is quite aware that EGD's evidence has stated that EGD does not do "capacity releases" in the winter as EGD has used its response to FRPO from the last year's cases to demonstrate this point throughout its IRR's. However, EGD's evidence states in Ex. C, T1, S6, p. 6, para. 11:

"Once satisfied that the demands of EGD's customers will be met, the Gas Control group authorizes the Gas Supply group to use any remaining temporarily surplus transportation and/or storage assets to generate transactional service revenue."

It is to this release of assets from the Gas Control group to the Gas Supply group that we were referring. Please answer the IR's at Schedules 5 and 7 using the assets that were authorized to be "released" as temporarily surplus from the Gas Control group to the Gas Supply group for use in generating transactional service revenue.

REF: EB-2013-0046, Exhibit I, Tab 7, Schedule 15

In this interrogatory, FRPO requested that EGD provide, as one of the options, the ratepayer impact of using the Board approved methodology from EB-2012-0055. While we understand that approach is not what EGD is proposing, we see it as a reasonable alternative to the options presented. Please provide the calculation as requested.

REF: EB-2013-0046, Exhibit I, Tab 7, Schedule 14

This interrogatory requested the provision of Appendix D which was omitted from the evidence. In receiving the Appendix D in the IR response, not only was it hard to follow without the provision of formulae but it was saved in a different format that precluded its copying into a spreadsheet for analysis. In addition, because it was omitted, we have been precluded from asking clarifying questions about the derivation and assumptions. To expedite our understanding, please provide the Excel copy of the table with working formulae. If unwilling to comply with our request, please substantiate EGD's reason for limiting inquiry in this area.

REF: EB-2013-0046, Exhibit I, Tab 7, Schedule 16

This interrogatory requested a "much more significant explanation regarding how the allocation of this cost is developed". EGD's response provided a description of where to find the amounts and a reference to the principle from a 2006 decision. Asked better, please show the calculation that leads to the allocation of costs to the Rate 6 rate class. Please provide all references and assumptions that support the calculation.

We trust our expedited review of the company's response provides preparation time to reduce any impact on the work that the Board has ordered us to do in the Settlement Conference. Should you need any clarification of our request prior to Wednesday, please email or call me so that understanding can be established.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. Interested Parties - EB-2013-0046
V. Brescia