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November 13, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
27th Floor
Toronto, Ontario
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Dear Ms. Walli:

RE: Enbridge Gas Distribution Inc.
Application for 2014-2018 Rates
Ontario Energy Board File Number: EB-2012-0459

Interrogatories of the Ontario Association of Physical Plant Administrators

Please find attached the interrogatories from the Ontario Association of Physical Plant Administrators to Enbridge Gas Distribution in the above-noted proceeding.

Yours truly,

[*Original signed by*]

Valerie Young
Director, Research and Analysis

cc. Andrew Mandyam, Enbridge Gas Distribution (e-mail)
Fred Cass, Aird & Berlis LLP (e-mail)
Hugh Briggs, OAPPA / Lakehead University (e-mail)
EB-2012-0459 Intervenors (e-mail)

ENBRIDGE GAS DISTRIBUTION INC.
2014-2018 Rates Application

EB-2012-0459

INTERROGATORIES FROM THE
ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

A. Enbridge's Customized IR Plan

Issue 8 – Is the methodology within Enbridge's Customized IR plan for setting final rates for 2015 through 2018 through annual Rate Adjustment proceedings, including cost allocation and rate design, appropriate?

1. Please describe how Enbridge proposes to address cost allocation in the annual Rate Adjustment proceedings for the years in the IR term beyond 2014, and explain how this proposed approach compares to the way cost allocation was handled during the 2008-2012 IR term.

Issue 13 - Is the proposal to permit Enbridge to apply for changes in rate design and new energy and non-energy services during the IR term appropriate?

2. *(Reference: Exhibit A2, Tab 3, Schedule 1, p. 16, para. 29)* - Please provide examples of the types of rate-related changes for energy services that Enbridge would consider: (a) minor in nature and with customer impacts that are minimal and (b) significant in nature and requiring a longer review period.

3. *(Reference: Exhibit A2, Tab 3, Schedule 1, p.16, para. 30)* - Enbridge indicates that should it need to change or introduce new miscellaneous or non-energy services during the IR term, it will seek approval for the changes and provide supporting evidence. Please indicate if any such filing would be part of the annual Rate Adjustment proceeding or a separate application.

Issue 16 – Are the overall levels of allowed revenue, rates and bill impacts for each of the years of the IR plan reasonable given the impact on consumers?

4. *(Reference: Exhibit H3, Tab1, Schedule 1, Appendix C and Exhibit H3, Tab 1, Schedule 2, Appendix C)* - With respect to the two schedules indicated in the reference, please provide estimates of the T-service bill impacts for typical customers in the Rate 115, Rate 145 and Rate 170 rate classes.

C. 2014 Rates

Issue 30 - Is Enbridge's utility Cost Allocation Study, including the methodologies and judgments used and the proposed application of that study with respect to 2014 Fiscal Year rates, appropriate?

5. *(Reference: Exhibit G2, Tab 2, Schedule 2)* - For each of the contract rate classes where the revenue to cost ratio in line 6 differs from that on line 7, please explain the rationale for the difference.

E. Other

Issue 42 - Are the proposed changes to Rate 100 and Rate 110 appropriate?

6. *(Reference: Exhibit H1, Tab 2, Schedule 2)*

   (a) Please provide a Rate 6 versus Rate 100 annual bill comparison, on a T-service basis, for a customer that is currently on Rate 6 and could choose service under the new Rate 100 with the proposed applicability provision and rate design in place. Please show the comparison for a customer at the low end of the maximum daily volume range and also at the high end.

   (b) Enbridge indicates that if the proposal for Rate 100 is approved, then it will contact the general service customers that could switch to the new Rate 100 to discuss the new option. Should a customer opt to switch, what would be the timing for making the change?

   (c) If all 33 of the current general service customers who could choose the new Rate 100 option were to do so, what would be the estimated annual bill impact, on a T-service basis, for the average customer remaining in Rate 6?

7. *(Reference: Exhibit H1, Tab 2, Schedule 3)*

   (a) How does lowering the minimum load factor requirement for Rate 110 from 50% to 40% address the feedback that Enbridge received that for some Rate 6 customers, the bill savings resulting from a switch to a contract class are not large enough to warrant the additional obligations and responsibilities of a contract rate?

   (b) Please provide a Rate 6 versus Rate 110 annual bill comparison, on a T-service basis, for a typical customer that is currently on Rate 6 and could choose service under Rate 110 with the proposed applicability provision in place.

   (c) Enbridge indicates that if the proposal for Rate 110 is approved, then it will contact the general service customers that could switch to Rate 110 to discuss the new option. Should a customer opt to switch, what would be the timing for making the change?

   (d) What would be the estimated annual bill impact, on a T-service basis, for the average customer remaining in Rate 6 if say one-third of the approximately 300 current general service customers who could switch to Rate 110 with the proposed applicability provision in place were to do so?

Issue 43 – Are the proposed changes to the Rate Handbook appropriate?

8. *(Reference: Exhibit H1, Tab 2, Schedule 1)* - For the Rate 6 customers who will be obligated to provide information under the proposed Section P, what will Enbridge use as the source for determining the customer's peak demand?

9. *(Reference: Exhibit H2, Tab 6, Schedule 1)*

   (a) Rider H (Balancing Service Rider) sets out a Bundled Service Charge for Enhanced Title Transfer Service that is defined in terms of the difference between TransCanada PipeLines Firm Transportation tolls for the Eastern Zone and the Southwest Zone. Given that TransCanada's toll zones have been eliminated as of July 1, 2013, how is this charge now defined?

   (b) Are there any other sections of the Rate Handbook requiring revision as a result of the implementation of TransCanada's new tolls?