Filed: 2013-11-15 EB-2012-0459

Exhibit I.A1.EGD.Staff.1 Preliminary

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BOARD STAFF INTERROGATORY #1

INTERROGATORY

ISSUE A1: Is Enbridge's proposal for a Customized IR plan for a 5 year term covering its 2014 through 2018 fiscal years appropriate?

Evidence Ref: A2/T9/S1/ Incentive Ratemaking report (CEA)

Concentric Energy Advisors, Inc. (CEA) prepared a report for Enbridge called the Incentive Ratemaking Report (Ex A2, Tab 9, Sch 1). Please provide all supporting documents (i.e., the working papers) that contain all the data and calculations undertaken by CEA to produce the following:

- a) The estimated growth in total factor productivity (TFP) and OM&A partial factor productivity (PFP) in all sample years for Enbridge, the Industry Study Group aggregate, and the Seven Company Sub-Group aggregate. The data provided should include all relevant information that enters into the TFP and PFP calculations for every gas distributor included in the Industry Study Group and/or Seven Company Sub-Group; the working papers should also display the formulas and other calculations that are used to calculate the output quantity, input quantity, and TFP indices in all sample years.
- b) The estimated industry-specific inflation factor, as well as all input price indices that were constructed in conjunction with the TFP and PFP analysis.
- c) The cost benchmarking analysis and results; these working papers will include all data used to construct the cost benchmarks for Enbridge and other distributors in the Industry Study Group and Seven Company Sub-Group, as well as all supporting analyses that were used to select the 34 distributors used as peers for Enbridge.

The "working papers" to be provided should include all relevant datasets used in the productivity, benchmarking and inflation analyses; all spreadsheet models that were used to develop CEA's empirical results; any computer code that CEA may have developed to undertake these analyses; and the output of all computer programs that CEA ran to produce, in whole or in part, its productivity, benchmarking, and inflation results.

<u>RESPONSE</u>

The attached CD contains four MS Excel files that support the productivity, benchmarking and inflation results presented in Concentric's report filed as Exhibit A2, Tab 9, Schedule 1. There are an additional five MS Excel files that also support the

Witnesses: J. Coyne - Concentric

J. Simpson – Concentric M. Bartos - Concentric

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productivity, benchmarking and inflation results presented in Concentric's report. Those files contain confidential information. A CD containing all nine relevant MS Excel files will be provided to any requesting party who signs the Board's Declaration and Undertaking,

Witnesses: J. Coyne - Concentric

J. Simpson – Concentric M. Bartos - Concentric