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December 27, 2013

VIA RESS, EMAIL and COURIER

Ms Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, Ontario, M4P 1E4

Dear Ms Walli:

Re: Enbridge Gas Distribution Inc. ("Enbridge") 2014 – 2018 Rate Adjustment Application Ontario Energy Board ("Board") File Number EB-2012-0459

Further to the Board's Procedural Order No. 2 dated October 3, 2013, Enbridge received Intervenor evidence from John Todd and Michael Roger of Elenchus Research Associates Inc. on behalf of the Association of Power Producers of Ontario ("APPrO") on December 18, 2013.

In accordance with the procedural order Enbridge was to file interrogatories of Intervenor evidence by December 23, 2013 however due to the winter storm and power outages Enbridge was unable to file the interrogatories until today. Accordingly, attached please find Enbridge's interrogatories of APPrO's evidence.

This submission was filed through the Board's Regulatory Electronic Submission System.

Please contact the undersigned if you have any questions.

Yours truly,

[original signed by]

Lorraine Chiasson Regulatory Coordinator

Attach.

cc: Mr. F. Cass, Aird & Berlis LLP All Interested Parties in EB-2012-0459

Enbridge Gas Distribution Inc. Interrogatories of the Association of Power Producers of Ontario

Reference: Page 1

- In the introduction of the Elenchus evidence on page 1 at line 13, an estimated rate impact for Rate 125 customers stemming from Enbridge's GTA project is stated to be 23.8%. Please confirm your understanding that the basis on which the Company provided the referenced estimated rate impacts was different for bundled customers (T-service basis) versus unbundled customers (delivery basis).
- 2. Further to the evidence on page 1 at line 13, for an average APPrO customer on Rate 125, please provide the proportion or percentage that Rate 125 CD charges represent of their total delivered gas charges, that is including commodity, transportation, load balancing, and delivery to the plant. If this breakdown cannot be provided, please provide for the average APPrO customer on Rate 125 an average annual gas consumption.

Reference: Pages 14 and 15

- 3. Please provide APPrO's understanding about the level of excess capacity that existed in any relevant parts of Enbridge's distribution system at the time the Leave-to-Construct (LTC) applications for the four (4) Rate 125 customers listed in the table on page 13 were filed with the OEB.
- 4. Is it APPrO's understanding that the Company applies the feasibility test for Rate 125 customer in a manner that is different than for any other bundled or unbundled customer? If this is APPrO's understanding, please explain in detail the basis for the understanding
- 5. Is it APPrO's understanding that if the proposed projects in the table on page 13 were for customers other than Rate 125 customers that the project design and/or the feasibility test would be carried out differently for those customers versus Rate 125 customers? If this is APPrO's understanding, please explain in detail the basis for the understanding