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February 26, 2014

VIA RESS, EMAIL and COURIER

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

**Re: EB-2012-0459 - Enbridge Gas Distribution Inc. ("Enbridge")
2014 – 2018 Rate Application
Undertaking Responses**

Further to Enbridge Gas Distribution's filing of February 25, 2014, enclosed please find the following undertaking responses:

Exhibit J2.1 and J2.3;
Exhibit J4.7 and J4.8.

This submission was filed through the Board's RESS and is available on the Company's website at www.enbridgegas.com/ratecase.

Yours truly,

(original signed)

Lorraine Chiasson
Regulatory Coordinator

cc: Mr. F. Cass, Aird & Berlis
EB-2012-0459 Intervenors

UNDERTAKING J2.1

UNDERTAKING

TR 67

To provide a table setting out EGD's Deferral and Variance Accounts.

RESPONSE

Please see table on page 2.

Witness: K. Culbert

EGD's Proposed/Approved Deferral and Variance Accounts

Line No.	Account Name	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008
				EB-2012-0459			EB-2011-0354	EB-2011-0277	EB-2010-0146	EB-2009-0172	EB-2008-0219	EB-2007-0615
1	Purchased Gas Variance Account	1	1	1	1	1	1	1	1	1	1	1
2	Unabsorbed Demand Cost Deferral Account	-	-	-	-	1	-	-	-	-	-	-
3	Design Day/Criteria Transportation Deferral Account	-	-	-	-	1	1	-	-	-	-	-
4	Transactional Services Deferral Account	1	1	1	1	1	1	1	1	1	1	1
5	Unaccounted for Gas Variance Account	1	1	1	1	1	1	1	1	1	1	1
6	Storage and Transportation Deferral Account	1	1	1	1	1	1	1	1	1	1	1
7	Deferred Rebate Account	1	1	1	1	1	1	1	1	1	1	1
8	Customer Care Services Procurement Deferral Account	1	1	1	1	1	-	-	-	-	-	-
9	Customer Care CIS Rate Smoothing Deferral Account	1	1	1	1	1	1	1	-	-	-	-
10	Average Use True Up Variance Account	1	1	1	1	1	1	1	1	1	1	1
11	Greenhouse Gas Emissions Impact Deferral Account	1	1	1	1	1	-	-	-	-	-	-
12	Carbon Dioxide Offset Credits Deferral Account	-	-	-	-	-	1	1	1	1	1	1
13	Earnings Sharing Mechanism Deferral Account	1	1	1	1	1	-	1	1	1	1	1
14	Manufactured Gas Plant Deferral Account	1	1	1	1	1	1	1	1	1	1	1
15	Gas Distribution Access Rule Impact Deferral Account	1	1	1	1	1	-	-	-	-	-	-
16	Gas Distribution Access Rule Costs Deferral Account	-	-	-	-	-	1	1	1	1	1	1
17	Ontario Hearing Costs Variance Account	1	1	1	1	1	1	1	1	1	1	1
18	Electric Program Earnings Sharing Deferral Account	1	1	1	1	1	1	1	1	1	1	1
19	Open Bill Revenue Variance Account	1	1	1	1	1	1	1	1	1	1	-
20	Ex-Franchise Third Party Billing Services Deferral Account	1	1	1	1	1	1	1	1	1	1	-
21	Post-Retirement True-Up Variance Account	1	1	1	1	1	1	-	-	-	-	-
22	Constant Dollar Net Salvage Adjustment Deferral Account	1	1	1	1	1	1	-	-	-	-	-
23	Transition Impact of Accounting Changes Deferral Account	1	1	1	1	1	1	1	1	1	1	1
24	Demand-Side Management Variance Account	1	1	1	1	1	1	1	1	1	1	1
25	Lost Revenue Adjustment Mechanism Variance Account	1	1	1	1	1	1	1	1	1	1	1
26	Demand Side Management Incentive Deferral Account	-	-	-	-	-	1	1	-	-	-	-
27	Shared Savings Mechanism Variance Account	-	-	-	-	-	-	-	1	1	1	1
28	Greater Toronto Area Project Variance Account	1	1	1	1	-	-	-	-	-	-	-
29	Relocation Mains Variance Account	1	1	1	-	-	-	-	-	-	-	-
30	Replacement Mains Variance Account	1	1	-	-	-	-	-	-	-	-	-
31	Class Action Suit Deferral Account	-	-	-	-	-	-	1	1	1	1	1
32	Mean Daily Volume Mechanism Deferral Account	-	-	-	-	-	-	1	1	1	1	1
33	Municipal Permit Fees Deferral Account	-	-	-	-	-	-	1	1	1	1	1
34	Open Bill Access Variance Account	-	-	-	-	-	-	1	1	1	1	1
35	Open Bill Service Deferral Account	-	-	-	-	-	-	1	1	1	1	1
36	Unbundled Rate Implementation Cost Deferral Account	-	-	-	-	-	-	1	1	1	1	1
37	Unbundled Rates Customer Migration Variance Account	-	-	-	-	-	-	1	1	1	1	1
38	Tax Rate and Rule Change Variance Account	-	-	-	-	-	-	1	1	1	1	1
39	International Financial Reporting Standards Deferral Account	-	-	-	-	-	-	-	1	1	1	-
40	Change in Purchased Gas Variance Disposition Methodology DA	-	-	-	-	-	-	-	-	1	1	-
41	Total Deferral and Variance Accounts	25	25	23	23	24	20	26	26	27	27	22

Witness: K. Culbert

UNDERTAKING J2.3

UNDERTAKING

TR 85

To provide an indication of whether Deferral and Variance Account balances, exclusive of the PGVA gas cost related deferral and variance account, was a debit or credit to ratepayers during the last IRM term.

RESPONSE

Please see table on page 2.

Deferral and Variance Account Amounts Approved For Clearance

<u>Line No.</u>	<u>Clearance Proceeding</u>	Total Principal		Total Principal	
		Balance Approved For Clearance	Excluding PGVA Related Amounts	Balance Approved For Clearance	Excluding PGVA & ESMIDA Related Amounts
		(\$000's)		(\$000's)	
1.	EB-2009-0055	2008 ESM and Deferral/Variance Clearance Review	1,824.2	7,424.2	
2.	EB-2010-0042	2009 ESM and Deferral/Variance Clearance Review	2,683.8	21,983.8	
3.	EB-2011-0008	2010 ESM and Deferral/Variance Clearance Review	(3,797.3)	13,552.7	
4.	EB-2012-0055	2011 ESM and Deferral/Variance Clearance Review	(7,458.0)	6,842.0	
5.	EB-2013-0046	2012 ESM and Deferral/Variance Clearance Review	(18,042.5)	(10,650.5)	
6.	Total		(24,789.8)	39,152.2	

Witness: K. Culbert

UNDERTAKING J4.7

UNDERTAKING

TR 185

To provide percentage of each category of capitalized overheads allocated to the "System Integrity" line in each year.

RESPONSE

The following table shows the percentage of total Departmental Labour Cost, total Capitalized Administrative and General, and total Interest During Construction that would be allocated to the System Integrity and Reliability line of Table 13 (p. 45 of Capital Overview Exhibit B2, Tab 1, Schedule 1).

		<u>Percentage of allocations applied to System Integrity and Reliability</u>				
		Col 1	Col 2	Col 3	Col 4	Col 5
		Board Approved				
		Budget	Actual	Forecast	Forecast	Forecast
Line Item		2013	2013	2014	2015	2016
1	Percentage of Total Departmental Labour Costs (DLC)	49%	47%	56%	51%	50%
2	Percentage of Total Capitalized Administrative and General (AG)	42%	35%	43%	42%	44%
3	Percentage of Total Interest During Construction (IDC)	39%	30%	43%	35%	43%
4	Percentage of total DLC/AG/IDC applied to System Integrity and Reliability	47%	42%	51%	47%	48%

Witness: P. Squires

UNDERTAKING J4.8

UNDERTAKING

TR 187

To provide actual 2013 customer additions.

RESPONSE

The actual customer additions for 2013 were 34,644. This represents a variance of 3,935 or 10% below the 2013 budget of 38,579.

The Customer Growth capital (as shown in Exhibit B2, Tab 1, Schedule 1, p. 45) was \$14.8 million or 15% over budget in 2013, for reasons related to growing cost pressures impacting customer-related capital and a shifting of the customer mix and type of work required to attach customers.

Witness: P. Squires