

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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April 9, 2014

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

VIA E-Mail

Dear Ms. Walli:

Re:

EB 2014-0039 - Enbridge Gas - QRAM Application

Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

On behalf of Vulnerable Energy Consumers Coalition (VECC), we have enclosed their interrogatories with respect to the above-noted proceeding.

Thank you.

Yours truly,

Michael Janigan Counsel for VECC

cc: EGDI - Director - Andrew Mandyam - Andrew.mandyam@enbridge.com

EGDI - Counsel - Fred Cass - fcass@airdberlis.com

EGDI - Counsel - Tania Persad - Tania.persad@enbridge.com

All interested parties - EB 2012-0459 - via email

Enbridge Gas Distribution Inc.("EGD") April 1, 2014 QRAM Application EB-2014-0039

VECC INTERROGATORIES

VECC-1

Reference: EGD IR Responses, Cover Letter

Preamble: On page 2, EGD states

"... the Company's gas supply plan forecasts a 1 in 5 winter, yet the actual conditions have been 1 in 25 as of the end of February and are projected to be the coldest on record (since 1954) as of the end of March."

- a) Please confirm that "1 in 25" means that 96% of the time EGD would expect less extreme weather. If unable to so confirm, please explain.
- b) Given the actual conditions in March, would EGD now characterize the 2013-2014 winter as 1 in 25 or would it be more like 1 in 50?
- c) Please confirm that the basis for characterizing the 2013-2014 winter as "1 in 25" is based on historical data. If unable to so confirm, please explain.
- d) If the actual conditions in the winter of 2014-2015 replicate those experienced in 2013-2014, would it also be characterized as "1 in 25" or would the historical 2013-2014 experience lead EGD to conclude that such an experience was "1 In X" where X is less than 25?
- e) Will the actual experience in the 2013-2014 winter affect EGD's gas supply planning going forward?

VECC-2

Reference: Ibid

Preamble: EGD adds that

"Enbridge submits that an expanded process for comprehensive examination of the subject gas costs is inconsistent with, and not contemplated by, the Board's established QRAM process ... the prescribed QRAM process is meant

to be mechanistic and summary."

- a) Are there <u>any</u> scenarios under which EGD would support rate mitigation or smoothing in conjunction with a QRAM application due to extreme and unforeseen conditions that have significant bill impacts on sales customers? If so, please describe any such scenarios; if not, please explain why not.
- b) Of all the options either proposed or implied on the record by parties to this proceeding, what would be EGD's preferred mitigation option if the Board does approve rate mitigation in implementing the subject QRAM application?