

April 9, 2014

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: EB-2014-0039 – Enbridge Gas Distribution Inc. – QRAM Application – Interrogatories

On March 27, 2014, the Ontario Energy Board (“Board”) issued its Decision and Interim Order approving, on an interim basis, the disposition of the balance in Enbridge Gas Distribution Inc.’s (“EGD”) Purchased Gas Variance Account (“PGVA”) using the standard 12-month period. The interim decision was made pending a review of rate mitigation alternatives. The Council acknowledges that the Board has limited the scope for further review to EGD’s ability to mitigate rates, alternatives available for rate mitigation and the consequences of those alternatives. Pursuant to Procedural Order No. 1 dated April 1, 2014, the Consumers Council Canada submits the following interrogatories to EGD:

1. In its March 25, 2014, Reply Submissions, EGD set out its position that while it did not agree that it is appropriate to extend the recovery period beyond the standard 12 months, should the Board decide that smoothing is appropriate, the smoothing should be applied in a subsequent QRAM application by EGD in 2014 and not in this Application. If the Board determines that rate mitigation is appropriate please set out EGD’s specific proposal for mitigation.
2. The 2006 Electricity Distribution Rate Handbook requires electricity distributors to file mitigation plans if bill impacts are projected be 10% or more. Why should this requirement not apply to EGD? Under what circumstances would EGD propose mitigation?
3. Please explain how, from EGD’s perspective, recovery of the amounts over a longer time frame (24 months vs. 12 months) could impact the retail market.
4. Please file EGD’s budget billing plan policy. In light of this winter’s exceedingly high gas costs does EGD plan to amend that policy in any way? If so, please explain how.
5. In addition to budget billing does EGD have any other types of payment plans that would assist customers who may be faced with larger than normal bills in the upcoming heating season? If so, please explain what those policies are.
6. Please explain how EGD currently communicates with its customers regarding its demand side management programs. Does EGD have plans to increase the promotion of its programs in light of this winter’s experience? Please list all of the current programs that are available to residential consumers.
7. How does EGD currently communicate with its customers regarding gas cost increases, bill increases etc.? Does EGD intend to change this in light of the recent volatility? If not, why not? If so, please explain how.
8. Please provide a schedule setting out quarterly gas cost pricing for the past 5 years.
9. Please provide a schedule setting out an average residential bill (including all components) for each quarter for the last 5 years.

Yours truly,

Julie E. Girvan

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CC: EGD, Regulatory
All Parties
Ken Whitehurst, CCC