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August 18, 2014

BY EMAIL & COURIER

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms Walli:

**Board File No. EB-2014-0195 – Enbridge Gas Distribution Inc.
Deferral and Variance Account Disposition
Energy Probe – Interrogatories to Applicant**

Pursuant to Procedural Order No. 1, issued August 5, 2014, attached please find the Interrogatories of Energy Probe Research Foundation (Energy Probe) to Enbridge Gas Distribution in the EB-2014-0195 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc: Andrew Mandyam, Enbridge Gas Distribution Inc. (By email)
Michael Lister, Enbridge Gas Distribution Inc. (By email)
David Stevens, Aird & Berlis LLP (By email)
Randy Aiken, Aiken & Associates (By email)
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Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by Enbridge
Gas Distribution Inc. for an order or orders approving the
clearance or disposition of amounts recorded in certain
deferral or variance accounts.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

August 18, 2014

**ENBRIDGE GAS DISTRIBUTION INC.
2013 DEFERRAL AND VARIANCE ACCOUNTS & EARNINGS SHARING
EB-2014-0195**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Interrogatory #1

**Ref: Exhibit A, Tab 2, Schedule 1 &
July 22, 2014 Letter**

In its' July 22, 2014 letter, Enbridge indicates that it is proposing a January 1, 2015 implementation date due to the current timing of this proceeding.

Please update the figures in Appendix A to reflect a forecast clearance of January 1, 2015.

Interrogatory #2

Ref: Exhibit B, Tab 3, Schedule 3

- a) Please explain the difference in the depreciation (\$47.3) and the accumulated depreciation (\$21.7).**
- b) Please confirm that the rate base has been calculated as the average of the monthly averages. If this cannot be confirmed, please indicate how the rate base figure has been calculated.**

Interrogatory #3

Ref: Exhibit B, Tab 3, Schedule 4

Please reconcile the figure of \$252,900 shown on page 1 with the calculated figure of \$246.9 in the table on page 2.

Interrogatory #4

Ref: Exhibit C, Tab 1, Schedule 1

- a) With the delay with a January 1, 2015 implementation date, will the unit rates still be applied to each customer's actual consumption over the January 1, 2013 through December 31, 2013 period?**
- b) Please confirm that the references to Exhibit C, Tab 2, Schedule 2 should be to Exhibit C, Tab 1, Schedule 2. If this cannot be confirmed, please provide Exhibit C, Tab 2, Schedule 2.**

Interrogatory #5

Ref: Exhibit C, Tab 1, Schedule 2

Please update the schedules to reflect the change in balances as a result of not clearing the balances until January 1, 2015.

Interrogatory #6

Ref: Exhibit C, Tab 1, Schedule 1

- a) Please explain why a DRR allocator was not produced.**
- b) Are both the TIACDA and PTUVA related to labour costs with O&M costs?**
- c) How was the forecast amount included in rates (\$42.8 million) for forecast pension and post-employment benefit expenses allocated to rate classes?**
- d) Please provide a table that shows, by rate class, the difference in the PTUVA amount allocated based on the proposed rate base methodology and the response to part (c) above.**
- e) What is the most comprehensive representation of the distribution of O&M costs to each rate class that is available for 2013?**
- f) Please provide a table that shows, by rate class, the difference in the TIACDA amount allocated based on the proposed rate base methodology and the response to part (e) above.**