

PETER C.P. THOMPSON, Q.C.
T 613.787.3528
pthompson@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com



By electronic filing

August 20, 2014

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

Enbridge Gas Distribution Inc. ("EGD")
2013 Deferral Accounts
Board File No.: EB-2014-0195
Our File No.: 339583-000182

Please find attached the Interrogatories of our client, Canadian Manufacturers & Exporters ("CME"), pursuant to Procedural Order No. 1 dated August 5, 2014.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Peter Thompson', is written over a horizontal line.

Peter C.P. Thompson

PCT\slc
enclosure

c. Andrew Mandyam (EGD)
David Stevens (Aird & Berlis)
Intervenors EB-2014-0195
Paul Clipsham and Ian Shaw (CME)
Vince DeRose and Emma Blanchard (BLG)

OTT01: 6493687: v1

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

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 and variance accounts.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS ("CME")
TO ENBRIDGE GAS DISTRIBUTION INC. ("EGD")**

Manufactured Gas and Customer Care CIS Rates Smoothing

CME #1

Reference: Exhibit A, Tab 2, Schedule 1, page 4, lines 12 and 13
Exhibit B, Tab 1, Schedule 1, page 1, para.1

EGD proposes to carry forward the debit balances in these deferral accounts to a future proceeding. In connection with this proposal, please provide the following information:

- (a) Please advise of the extent to which the debit balances in each of these accounts are likely to increase from their current levels between October 1, 2014 and the date on which EGD proposes to clear the accounts.

Unaccounted For Gas ("UFG")

CME #2

Reference: Exhibit A, Tab 2, Schedule 1, page 4, line 4
Exhibit B, Tab 2, Schedule 2, page 3, para.7

The evidence indicates that there were two (2) significant third party damages incidents that occurred in 2013 on high pressure lines – one in Ottawa and one in Markham. With respect to this evidence, please provide the following further information:

- (a) Please provide details of each of the significant third party damages incidents in Ottawa and Markham.
- (b) Identify the parties responsible for causing the damages.
- (c) What claims, if any, did EGD make against the parties causing the damages.

- (d) What insurance coverage, if any, did EGD have to respond to the damages caused in each incident?
- (e) In each of the 2 major third party damages incidents, for what period of time was gas being lost from the system before the appropriate valves were closed?
- (f) Provide EGD's estimates of the gas volume lost as a result of each incident.
- (g) Please explain why losses arising from third party damages incidents fall within the ambit of the deferral account. In particular, please explain why EGD's shareholder should not be at risk for the failure of EGD to recover from the responsible third parties all of the damages which they have caused, including the value of the gas which was lost as a result of the incidents.

2013 Actual Average Use True-Up

CME #3

**Reference: Exhibit A, Tab 2, Schedule 1, page 4, line 9
Exhibit B, Tab 3, Schedule 2, page 1, para.3**

EGD seeks to recover a debit amount of about \$5.6M for a short-fall in average uses which, according to EGD, is primarily attributable to a slower than expected economic recovery. EGD is seeking to recover this debit balance following actual 2013 consumption by ratepayers significantly greater than normal because of the extremely cold weather in the last quarter of 2013. This cold weather also led to very significant gas cost increases which the Board has already approved for recovery from ratepayers. In connection with the foregoing, please provide the following information:

- (a) To what extent were volumes consumed by Rates 1 and 6 customers in 2013 greater because of colder than normal weather, particularly in the last quarter of the year?
- (b) How much incremental margin did EGD realize from Rates 1 and 6 customers in 2013 as a result of actual use exceeding normal use because of the colder than normal weather?
- (c) Why should EGD be entitled to recover any amounts attributable to a slower than expected economic recovery when the customers against whom such relief is sought have already been hard hit with the cost consequences of an extremely cold winter, including significant gas cost increases attributable to the colder than normal weather in 2013?

Ontario Hearing Cost Variance Account

CME #4

Reference: Exhibit A, Tab 2, Schedule 1, page 4, line 8
Exhibit B, Tab 3, Schedule 4, page 2

Column 2 in the second reference above is headed "Actual Regulatory Costs Incurred as at 30-Apr-14". In connection with the amounts shown in lines 1 to 8 of that Exhibit and in Notes 1 and 2, please provide the following information:

- (a) Do any of the amounts shown in lines 1 to 8 and Notes 1 and 2 relate to services provided after December 31, 2013? If so, then please provide details of the amounts which pertain to services provided in 2014?