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January 27, 2015

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-2014-0276 – Enbridge Gas Distribution Inc.
2015 Rate Adjustment Application
Energy Probe – Interrogatories to Applicant**

Pursuant to Procedural Order No. 1, issued on January 12, 2015, attached please find the Interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2014-0276 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)
Fred Cass, Aird & Berlis LLP (By email)
Randy Aiken, Aiken & Associates (By email)
Parties of Interest (By email)

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);

AND IN THE MATTER OF an Application by Enbridge
Gas Distribution Inc. for an order or orders approving or
fixing rates for the sale, distribution, transmission and
storage of gas commencing January 1, 2015.

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

January 27, 2015

**ENBRIDGE GAS DISTRIBUTION INC.
2013 DEFERRAL AND VARIANCE ACCOUNTS & EARNINGS SHARING
EB-2014-0276**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Please note that a number of the interrogatories that follow request the addition of 2014 actual data to tables. If Enbridge does not yet have actual data for 2014, please respond by including the most recent year-to-date figures for 2014 along with a forecast for the remaining month(s) of 2014.

Interrogatory #1

Ref: Exhibit B1, Tab 1, Schedule 1

What would be the impact on gas in storage if the QRAM price was updated to reflect the January 1, 2015 price?

Interrogatory #2

Ref: Exhibit B1, Tab 1, Schedule 3

- a) Other than the gas in storage and working cash allowance columns, have any of the other figures been updated in the table on page 1 as compared to that approved in EB-2012-0459?**
- b) Please provide a table similar to that on page 2 that shows the derivation of the \$11.1 million working cash allowance shown as the EB-2012-0459 place holder.**

Interrogatory #3

Ref: Exhibit C1, Tab 2, Schedule 1

- a) Please expand Table 1 to include 2013 Actual, 2013 Normalized Actual, 2014 Actual, 2014 Normalized Actual and 2015 Budget figures.**
- b) Please add a column to Table 2 to reflect 2014 Actual figures.**
- c) Please update Table 3 to reflect 2014 Actual data.**

Interrogatory #4

Ref: Exhibit C1, Tab 2, Schedule 1 & Appendix A

- a) **Please explain the difference in the residential figures shown in figure 2 and those shown in Tables 2 & 3 in Appendix A. For example, please explain the difference in the 2015 figure of 2,440 shown in Figure 2 and the figure of 2,419 shown in Tables 2 & 3 in Appendix A. It appears that Figure 2 actually shows data for 2004 through 2014 rather than 2005 through 2015. Please provide a corrected Figure 2 in response to part (b) below.**
- b) **Please update Figures 2 & 3 to reflect actual normalized average use for 2014.**

Interrogatory #5

Ref: Exhibit C1, Tab 2, Schedule 1, Appendix A

Please update Tables 1 through 4 to include actual data for 2014.

Interrogatory #6

Ref: Exhibit C1, Tab 2, Schedule 1, Appendix B

Please update Tables 1 and 3 to reflect actual data for 2014.

Interrogatory #7

Ref: Exhibit C2, Tab 1, Schedule 2

Please add a column to Table 1 that shows the Environment Canada Degree Days that were approved in EB-2012-0459 for 2014.

Interrogatory #8

Ref: Exhibit C2, Tab 1, Schedule 4

Please add two columns to the table shown on page 1, while leaving the information provided. In particular, please add a column showing the 2014 Actual data and a column showing the 2015 forecast from EB-2012-0459.

Interrogatory #9

Ref: Exhibit C3, Tab 2

Please provide versions of Schedules 2, 3 and 4 that replace the 2014 Board Approved Budget column with 2014 Actual data.

Interrogatory #10

Ref: Exhibit D2, Tab 1, Schedule 2

Please update the 2015 DSM related accounts shown on pages 21 and 22, if necessary, to reflect the Board's EB-2014-0134 Report of the Board - Demand Side Management Framework for Natural Gas Distributors (2015-2020).

Interrogatory #11

Ref: Exhibit E1, Tab 3, Schedule 1

- a) Please show the result cost of debt summary shown in Table 1 assuming that Enbridge did not issue either of the two long term debt issuances shown in Table 2.**
- b) Given that the forecasted long term debt and preferred shares total 68.67% which is well in excess of approved level of 64%, resulting in negative short-term debt of \$229.4 million, please explain why Enbridge believes it requires additional long term debt in 2015.**

Interrogatory #12

Ref: Exhibit E1, Tab 3, Schedule 1

- a) Please explain how the short-term debt rate of 1.52% shown in Table 1 has been forecast, including the timing of the forecast.**
- b) Please explain how the preferred shares rate of 2.60% shown in Table 1 has been forecast, including the timing of the forecast.**
- c) Based on the most recent information available, what would the forecast for the short-term debt rate and preferred shares debt be?**

- d) **When was the forecast of the long term debt rates shown in Table 2 done?**
- e) **Please update Table 2 to reflect the most recent forecasts available.**

Interrogatory #13

**Ref: Exhibit E1, Tab 3, Schedule 1 &
Exhibit E2, Tab 1, Schedule 2**

- a) **Please show the mapping of each of the 2 issuances shown in Table 2 of Exhibit E1, Tab 3, Schedule 1 with the corresponding amounts associated with these issuances in the table in Exhibit E2, Tab 1, Schedule 2.**
- b) **If the issuances identified in part (a) above include lines 19 through 22 in the table in Exhibit E2, Tab 1, Schedule 2, please explain the different rates for the two debt instruments with a September 15, 2025 maturity date and the different rates for the two debt instruments with a September 15, 2045 maturity date.**
- c) **Please show how the rates (coupon rates and effective rates) for the two issuances shown in Table 2 match the figures for the loans shown in the table in Exhibit E2, Tab 1, Schedule 2.**