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January 29, 2015

**Delivered by Email and Courier**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
26th Floor, Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. – 2015 Rate Adjustment  
Board File No. EB-2014-0276**

Please find enclosed APPrO's interrogatories in regards to the above noted matter.

Yours very truly,

**BORDEN LADNER GERVAIS LLP**  
Per:

*Original signed by John A.D. Vellone*

John A.D. Vellone

cc: David Butters, APPrO  
John Wolnik, Elenchus  
Andrew Mandyam, Enbridge Gas Distribution Inc.  
Fred Cass, Aird & Berlis LLP

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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.

**EB-2014-0276**

**Interrogatories From**  
**The Association of Power Producers of Ontario (APPRO)**

**January 29, 2015**

**Question: 1**

**Reference:**

- i. Exhibit C1 Tab 2 Schedule 1 Paragraph 11

**Preamble:**

Enbridge developed a probability weighted methodology for determining the likelihood of new customers coming on line. APPrO would like to better understand how this methodology is applied.

- a) Is the probability at each stage applied to the customer count or the customer volumes?
- b) Assuming that there are 3 contract customers in each of the 5 stages, please show a detailed calculation illustrating the application of the weighting and what contract customers would be included both at each stage and in the final forecast.
- c) Please compare the methodology used in EB-2012-0459 to forecast for potential new large-volume contract customers as against each Stage of Enbridge's new probability weighted approach. At what Stage, or between which Stages, did Enbridge previously include 100% of the volume of a potential new large-volume contract customer using the EB-2012-0459 methodology?

**Question: 2**

**Reference:**

- ii. Exhibit C1 Tab 2 Schedule 1 Appendix A page 5

**Preamble:**

Enbridge provides a comparison of the actual normalized consumption to Board approved normalized consumption for contract customers.

- a) Please provide the Board approved and actual normalized consumption for contract customers for 2014, if available. If the actual normalized consumption for 2014 is not currently available, please provide the data as soon as it becomes available.