

July 2, 2015

BY COURIER (2 COPIES) AND RESS

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0049 Enbridge Gas Distribution Inc. (“Enbridge”)
EB-2015-0029 Union Gas Limited (“Union”)
2015-2020 Demand Side Management (“DSM”) Plans**

I am writing on behalf of Environmental Defence pursuant to *Procedural Order #2* to indicate our intended areas of questioning for the technical conference.

Environmental Defence intends to ask questions in relation to topic 3, DSM budgets. In the hope of expediting the process, we are providing a number of written questions below. We hope that Enbridge and Union can simply indicate that the below written questions will be answered by way of undertaking.

Written Questions for Enbridge

1. Re Exhibit I.T3.EGDI.ED.3: This interrogatory requested the following: “Please re-calculate the rate allocation of the Large C/I Resource Acquisition Program’s for each year from 2016 to 2020 inclusive assuming that the Program’s expenditures are rate based and amortized over the expected lives of their lifetime cubic metre savings.” Enbridge indicated that it was unable to provide a response. However, Union was able to make appropriate assumptions and provide a response (see Exhibit B.T3.Union.ED.5). Environmental Defence asks that Enbridge provide a similar analysis as did Union.
2. Re Exhibit I.T3.EGDI.ED.6: This interrogatory requested the following: “Please re-calculate the rate allocation of the Small C/I Resource Acquisition Program’s for each year from 2016 to 2020 inclusive assuming that the Program’s expenditures are rate based and amortized over the expected lives of their lifetime cubic metre savings.” Enbridge indicated that it was unable to provide a response. However, Union was able to make appropriate assumptions and provide a response (see Exhibit B.T3.Union.ED.5). Environmental Defence asks that Enbridge provide a similar analysis as did Union.

3. Re Exhibit I.T3.EGDI.ED.7 (a): The CCM increases indicated in the interrogatory response are dramatically lower than the budget increases. Does Enbridge have any evidence and/or analysis to support this pessimistic scenario? If yes, please provide the evidence and analysis.
4. Re Exhibit I.T3.EGDI.ED.7 (b): Please provide the requested rate basing analysis using an analysis similar to the one used by Union in Exhibit B.T3.Union.ED.5.
5. Re Exhibit I.T3.EGDI.ED.8 (a) : The CCM increases indicated in the interrogatory response are dramatically lower than the budget increases. Does Enbridge have any evidence and/or analysis to support this pessimistic scenario? If yes, please provide.
6. Re Exhibit I.T3.EGDI.ED.8 (b): Please provide the requested rate basing analysis using an analysis similar to the one used by Union in Exhibit B.T3.Union.ED.5.
7. Re Exhibit I.T3.EGDI.ED.9: This interrogatory requested “Enbridge’s best estimate of its 2016 distribution revenue requirement and throughput volumes by rate class.” Enbridge indicated that this information will be available in its rate adjustment application in September. However, we requested Enbridge’s “best estimate” and it was not provided. Environmental Defence requests (a) Enbridge’s best estimate for 2016 and (b) the 2015 distribution revenue requirement and throughput volumes by rate class (actuals and board-approved).
8. Re Exhibit I.T3.EGDI.ED.10: Please provide a response to this interrogatory on a “best estimate” basis.

Written Questions for Union

1. Re Exhibit B.T3.Union.ED.8: Please provide Union’s best estimate of T2 gas commodity cost in 2016 or best estimate of gas commodity cost for a large volume customer in 2016.

In addition to the below, we will also have a number of questions to pose orally, including for Enbridge in relation to exhibits I.T3.EGDI.ED.12 to I.T3.EGDI.ED.16 and for Union in relation to exhibits B.T3.Union.ED.11, B.T3.Union.ED.12, B.T3.Union.ED.14, and B.T3.Union.ED.15.

Yours truly,



Kent Elson

cc: Applicants, Intervenors, and Board Staff for this Proceeding