



PUBLIC INTEREST ADVOCACY CENTRE
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June 10, 2015

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0122 – Enbridge Gas Distribution Inc.
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

In accordance with Procedural Order No.1 in the above noted proceeding please find attached the interrogatories of VECC. We have also forward copies to the applicant and their counsel as well as all intervenors via e-mail.

Yours truly,

Michael Janigan
Counsel for VECC

Cc: EGDI - Andrew Mandyam - EGDRegulatoryProceedings@enbridge.com
EGDI – Counsel – Lorraine Chiasson - EGDRegulatoryProceedings@enbridge.com
EGDI – Counsel – David Stevens – dstevens@airdberlis.com
Intervenors

REQUESTOR NAME	VECC
INFORMATION REQUEST NO:	# 1
TO:	Enbridge Gas Distribution Inc. (EGD)
DATE:	July 10, 2015
CASE NO:	EB-2015-0122
APPLICATION NAME	2014 ESM and DVA Disposition

VECC - 1

Reference: D/T4/S1/ Gas Supply Plan Memorandum/pg. 18 (PDF pg.318)

- a) Please confirm that EGD is seeking to close both the DDCTDA and UDCDA 2014 accounts and replace it with a single UDCDA account.
- b) If this is confirmed please explain what the original intent was of having separate accounts and why this is no longer deemed necessary.

VECC - 2

Reference: D/T4/S1/ Gas Supply Plan Memorandum/pg. 19 (PDF pg.319)

- a) EGD has stated that it assumed 200,000 GJ/day of Niagara Falls to Enbridge Parkway capacity on TCPL. Was there any restriction on acquiring more than the 200,000 GJ of Supply/Transportation from Niagara? If not, why was this amount chosen?

VECC - 3

Reference: C/T1/S2/pg.5 (PDF pg. 109)

- a) EGD explains that the cost of unutilized capacity was \$31.7 million and that it was successful in releasing 100% of this to third parties to generate revenues of \$5.3 million. Please explain why the capacity was so highly discounted.

VECC - 4

Reference: B/T4/S2/pg.2 (PDF pg. 95) & D/T2/S1/pg.12 (PDF pg. 177)

- a) Please explain how (or if) the Short Term Incentive (STIP) payments (or other compensation incentives) were affected by EGD's failure to achieve many of the embedded OM&A productivity savings and nearly all of the capital savings (Table 5).

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