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October 27, 2015

Reply To: Thomas Brett
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Our File No. 155396

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli
Board Secretary

Dear Ms. Walli:

**Re: EB-2015-0114: Enbridge Gas Distribution Inc., 2016 Rate Adjustment Application
BOMA Interrogatories**

Please find attached BOMA's Interrogatories with respect to the above captioned proceeding.

Yours truly,

FOGLER, RUBINOFF LLP

A handwritten signature in blue ink, appearing to read "Thomas Brett", written over a horizontal line.

Thomas Brett

TB/dd

Encls.

cc: All Parties (*by email*)

ONTARIO ENERGY BOARD

**Enbridge Gas Distribution Inc.
Application for natural gas distribution, transmission
and storage rates commencing January 1, 2016.**

**INTERROGATORIES OF
BUILDING OWNERS AND MANAGERS ASSOCIATION,
GREATER TORONTO (BOMA)**

October 27, 2015

Tom Brett
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Counsel for BOMA

Interrogatories

Ref: Exhibit A, Tab 3, Schedule 1, Appendix B

1. Please provide revised line 2 incorporating Board's new cost of capital policy, released October 15, 2015.

Ref: Exhibit A, Tab 5, Schedule 1, Page 3

2. Does LUF gas only arise in respect of storage? Is there any LUF in respect of gas that does not enter storage but flows directly to customers? How does this differ from the Unbilled and Unaccounted for Gas discussed at Exhibit D1, Tab 2, Schedule 3? Are the two accounts additive; is there double counting?
3. Is the revenue EGD earns from managing Dawn Moore and Black Creek storage pools a credit to EGD cost of service? What is the revenue over the last several years? Please provide reference.
4. Please explain fully what is meant by "storage turnover rate"?

Ref: Exhibit A, Tab 5, Schedule 1, Page 2

5. Please explain the derivation of the 14.3% used to determine the \$5.6 million for the unregulated storage business's share of the cost of the Base Pressure case; and the same for LUF.
6. What is the derivation of the Base Pressure Gas cost of \$38.9 million? How was the amount of Base Pressure Gas determined? Please provide EGD's definition of Base

Pressure Gas, and the history of its use, including the determination of Base Pressure Gas amounts.

7. Does each of EGD's pools have the same level of Base Pressure Gas relative to its capacity? Please provide amounts of Base Pressure Gas for each pool, and an explanation for any differences. Please show the annual amount of Base Pressure Gas in place over the last five years, both for EGD storage as a whole and for each pool.

Ref: Ibid, Page 2

8. Please confirm the Base Pressure Gas is a rate base item.
9. Please explain the role of Tecumseh Gas Storage. Is it a separate corporation, a division of EGD, or some other entity? Are its accounts part of the regulated utility's accounts? Does it hold all of EGD's regulated and unregulated storage assets? Please explain fully.
10.
 - (a) Please explain fully the sale of 1.93 Bcf of Base Pressure Gas in the storage facility in 2015 (see footnote 7).
 - (b) What is the total volume of Base Pressure Gas before and after the sale of 1.93 Bcf?
 - (c) Why was the decision made to reduce the amount of Base Pressure Gas in 2015? Was the sole reason to create more unregulated storage capacity? Have other changes to the level of Base Pressure Gas been made over the last ten years? What are the impacts of the reduction(s) on storage operations and costs?

- (d) What were the proceeds of the sale? How were the proceeds accounted for? Were the proceeds credited to the revenue requirement, or retained by the shareholder?

Ref: Exhibit B, Tab 1, Schedule 3, Page 1

11. Please explain column 6, which shows the volume of the gas in storage (monthly) corresponding to the 2016 gas in storage Rate Base Placeholder of \$276.3 million, found at Exhibit B, Tab 1, Schedule 2, Page 1. Please explain the difference in each month's gas in storage number, from the same month's placeholder number. Please explain the basis for each month's difference. Please explain to what extent the difference was caused by the changes to the gas supply plan and describe in detail the impact on a monthly basis.

Ref: Exhibit C1, Tab 2, Schedule 1, Page 1

12. Please provide actual volumes (year to date), and estimate for Tables 1 and 2, and Table 3 at Page 6.

Ref: Ibid, Page 4

13. How is large non-contract customers' gas consumption forecast? How many customers does EGD have who are eligible for contract rates, but elect to remain on general service (by rate)? What value of gas purchase do they represent?

Ref: Exhibit C2, Tab 1, Schedule 4, Page 1

14. How is underforecast or overforecast of customer additions adjusted for, if at all? What were 2014 Board approved customers additions (add column to the Table 1)? Are commercial customers broken down into components such as education, health, retail, office, etc.? If not, please explain why not. What are "traditional apartment buildings"? Do they include condominiums? Please explain.

Ref: Ibid, Page 2

15. Please explain how the company will remove the impact of Community Expansion Program customer addition from the determination of final 2016 rates.

Ref: Exhibit C3, Tab 2, Schedule 3, Page 3

16. Please explain Column 4, "Change in Use".

Ref: Exhibit D1, Tab 2, Page 2

17. Please explain the reference to "baseloading a portion of the Chicago requirement". Please provide a copy of the 2016 gas supply plan, and the "mitigation plan".

Ref: Exhibit D1, Tab 2, Schedule 1, Appendix A

18. Please provide copies of the monthly UDC reports since January 2015.

Ref: Exhibit D1, Tab 2, Schedule 3

19. Please provide the UUF forecast using both the new method and the method used to determine 2015 rates. Show what the actual results in the last five years would have been using the proposed method.
20. Please provide the most recent actuals for UUF for 2015.
21. Please explain the rationale for changing methods of forecasting UUF at this time, within the IRM period.

Ref: Exhibit D1, Tab 2, Schedule 4, Page 2

22. Please provide a detailed explanation for lines 12, 14 and 16.

Ref: Ibid, Page 5

23. Please explain the Total Transportation items, line 2 of \$79,412.90. How does this differ from the Transportation Costs at line 8 of Schedule 4?
24. Please explain line 1.4 Market Based Storage \$15,185.30 in Exhibit D1, Tab 2, Schedule 5. Is this a payment made by the utility to the unregulated storage company or entity? How was market price determined? Please explain fully.

Ref: Exhibit D1, Tab 2, Schedule 6, Page 1

25. BOMA would like to better understand how the various transportation contracts underpin the 2016 Budget Peak Day Demand. Could EGD provide for each of lines 4 through 11, inclusive, for 2016, separately for CDA and EDA, which transportation contracts

underpin the volumes provided to meet peak day demand? Could you cross-reference the list to the list of Transportation Contracts provided at D1, T2 Schedule 2, Page 1 to ensure all contracts are accounted for, other than ones that expire before the test year begins? Please provide the expiry date for each of the contracts.