



PUBLIC INTEREST ADVOCACY CENTRE
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October 26, 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-2015-0114 – 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.

Yours truly,

M. Garner/for

Michael Janigan
Counsel for VECC

Email copy:
Mr. Andrew Mandyam
EGDRegulatoryProceedings@enbridge.com

REQUESTOR NAME**VECC****TO:****Enbridge Gas Distribution Inc. (EGD)****DATE:****October 26, 2015****CASE NO:****EB-2015-0114**

VECC - 1

Reference: A1/T5/S1/pg.1-2

- a) Please explain why it is inconsistent (rather than simply not being the same) to fully allocate Base Pressure Gas and LUF costs on a fully allocated basis and all other costs on an incremental basis.
- b) Please define what EGD understands as the meaning of fully allocated and incremental costing in terms of storage assets. Please explain why incremental costing is better suited as the methodology to be applied in this case.

VECC - 2

Reference: A1/T5/S1/pg.2 & D2/T5/S1/pg.15

- a) Please provide the derivation of the \$32 to \$49 million estimated increase in revenue requirement if fully allocated costing were applied to all storage capital.

VECC - 3

Reference: D2/T5/S1/pg.23

- a) Please confirm that Tables 3 and 4 shown the OM&A costs allocated on an incremental cost basis.
- b) Please confirm that the total storage costs are the summation of the "Total" of each of Table 3 and Table 4 (i.e. total storage costs in 2007 are \$8,494,180 + \$236,803).
- c) Please provide the OM&A storage related costs on a fully allocated basis (or if the tables show fully allocated then on an incremental basis).

VECC - 4

Reference: C1/T2/S1/Appendix B pg.5

- a) Please revise Table 3 to show General Service separately from Contract Market Customers.

VECC - 5

Reference: C2/T1/S4/pg.2

- a) Please provide details as to the derivation of the 1,590 Community Expansion customers projected to take service in 2016.
- b) Has EGD filed the referenced Leave to Construct Application? If not when is this application expected to be filed?

VECC - 6

Reference: D1/T2/S3

- a) EGS is proposing to change the UAF model for 2016. Please reference the section of the Board Decision/Settlement which contemplates changes to forecasting methodologies.
- b) Please provide a table, similar to Table 3, which shows for 2010 through 2016, the UAF actuals, Board Approved (and Model A forecast if different from Board approved) and the UAF forecast if based on the proposed revised Model B (trend) methodology. For this table please use 2015 actual UAF to-date.

VECC - 7

Reference: D1/T1/S1/pg.12

- a) Given EGD does not anticipate any further activity for the CCSPDA is the Company seeking continuation in 2016 for this account. If yes please explain why.

VECC - 8

Reference: E1/T1/S1

- b) Please update Table 3 for the OEB cost of capital values issued on October 15, 2015.
- c) Please update all associated tables and provide the revised requested revenue requirement (e.g. E2/T1/S1/pg.1).

VECC - 9

Reference: E1/T3/S1

- a) Please provide the source and date of the 2.84% Canada yield. Please update this variable for the most current based on the same source.
- b) Please explain the derivation of the corporate spread of 1.40%.

END OF DOCUMENT 4/4