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October 26, 2015

**Delivered by RESS, Email & Courier**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27th Floor, Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. – 2016 Rate Adjustment Application  
Interrogatories from the Association of Power Producers of Ontario  
("APPrO")  
Board File No. EB-2015-0114**

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

Yours very truly,  
**BORDEN LADNER GERVAIS LLP**  
Per:

*Original signed by James K. Little*

James K. Little  
Jkl/kf  
Encls

cc: David Butters, APPrO  
John Wolnik, Elenchus  
EGDI - Andrew Mandyam  
EGDI – Counsel – Lorraine Chiasson  
EGDI – Counsel – David Stevens  
All Intervenors

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15 (Sched. B), as amended;

**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.

**EB-2015-0114**

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

**October 26, 2015**

**Question: 1**

Reference: i) Exhibit A1 Tab 5 Schedule 1 paragraph 4

Preamble: APPrO would like to better understand Enbridge's position on utility/non-utility cost allocation as well as Enbridge's statement *"that if Base Pressure Gas and LUF are treated on a fully allocated basis, then all capital storage capital costs should be treated on a fully allocated basis in order to be consistent and equitable."*

- a) Please confirm that LUF is an operating cost. If not confirmed, please explain.
- b) Has Enbridge ever reclassified any LUF as Base Pressure Gas? If so, please explain, and provide the last five years of volumes that have been reclassified.
- c) Is it Enbridge's position that if either Base Pressure Gas or LUF is allocated on a fully allocated basis, that all storage capital costs associated with utility and non-utility storage should be allocated on a fully allocated basis? Please explain.
- d) Please show how the values in the table in paragraph 4 page 2 of 6 were derived and include all related assumptions.

**Question: 2**

Reference: i) Exhibit A1 Paragraph 5

Preamble: Enbridge provides the volumetric drivers of storage; APPrO would like to understand the related deliverability drivers.

- a) Please redo the table in paragraph 5 and include the allocation of deliverability between regulated and non-regulated storage.
- b) Please provide the aggregate storage deliverability curve over an injection/withdrawal cycle for all storage assets, and also illustrate the respective regulated and non-regulated amounts making up such deliverability curve.

**Question: 3**

Reference: i) Exhibit A1 Schedule 1 paragraph 6

Preamble: Enbridge supports the use of continuation of an incremental cost allocation for LUF during the IRM.

- a) Please provide the annual volumes injected and withdrawn from storage for each of the last five years separately showing the volumes for the regulated, unregulated and total volumes. Please include the percentages that the regulated and unregulated represent of the total annual volumes.

**Question: 4**

Reference: i) Exhibit B1 Tab 1 Schedule 1

Preamble: Enbridge has used its placeholder rate base project cost estimates. APPrO is interested in understanding the status of major projects.

- a) Please provide the status of the GTA Reinforcement Project and any other major project included in the 2016 rate base.
- b) For each project noted in a) above, please provide the original capital budget, by year and the current forecasted completion costs.

**Question: 5**

Reference: i) 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) In addition to the Board approved normalized consumption for contract customers for 2015, please provide the forecast normalized consumption for contract customers for 2015 prior to any adjustments made to that forecast during settlement, and please provide the year-to-date best available information on how actual normalized consumption for contract customers for 2015 is tracking against both the Board approved and pre-settlement forecasts for 2015.
- b) The Board approved consumption for 2015 included an adjustment made during the settlement process. Was an equivalent adjustment applied to the forecast for 2016 consumption? If no, why not?