

Ontario Energy Board

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, (Schedule B) (the "Act");

AND IN THE MATTER OF an Application by Enbridge Gas Distribution Inc., under Sections 19 and 44 of the Act, for an exemption under section 2.2.2 of the *Affiliate Relationships Code* for Gas Utilities.

**Enbridge Gas Distribution Inc.
Application for Exemption ARC Section 2.2.2**

Interrogatories

Energy Probe Research Foundation

November 25, 2015

**Enbridge Gas Distribution Inc.
Application for ARC Section 2.2.2 Exemption
Interrogatories of Energy Probe Research Foundation**

Energy Probe IR #1

Ref: Application and General

- a) Please provide a Table that shows the ARC requirements applicable to the proposed outsourcing of IT Services to Enbridge.**
- b) For each applicable section and sub-section of the Code please indicate the Request and the specific evidence that EGD is relying on.**
- c) Please indicate specifically why the Accenture and Gartner Confidential evidence is provided.**
- d) Please indicate if a Business Case and Benchmarking and Market cost comparison information was provided to the Board at the time of consolidation of ITSS services in 2014-15 as stated in paragraph 3 of the Application. If not explain why not.**

Energy Probe IR #2

Ref: Appendix A, Schedules 12-15

- a) Please explain why the 2014 Service Schedules were not signed until December 14, 2014, rather than March 31, 2014, as per Paragraph 5 of the ISA.**
- b) Please explain the status of the 2015 Service Schedules and why these were not provided as part of the Application.**
- c) Please provide the 2011-2015 annual and total 5 year Corporate RCAM charges.**
- d) Please break out the Total IT Service Charges and reconcile to Appendix A for 2014/15.**
- e) Please provide an update on the new ISA for 2016 and an estimate of the total 2016 Corporate RCAM Charges and specifically IT costs,**

Energy Probe IR #3

Ref: Appendix A, Service Schedules Pages 14-32

- a) Please provide the 2015 Service Schedules for IT Schedules 12-15 and any other Enterprise, or other service schedules that include Corporate Services related to IT.**
- b) Please highlight the additional Services and amended/additional costs for which approval is requested.**
- c) Please map these services and costs to the 6 areas of Incremental services set out in the Application at paragraph 8.**
- d) Please compare in tabular form the Services and costs for 2015 with and without, the additional/enhanced services.**
- e) If the Services are not to begin until 2016 please provide the 2015 Service Schedules and provide the same information as requested in parts a-c.**

Energy Probe IR #4

Ref: Appendix B

Preamble: Designing and staffing the new organization, ITSS, continued throughout 2013/14. For other affiliates, and for some EGD services, the transfer of operational funding occurred in early 2015. EGD held back from fully participating in the consolidation in areas where ITSS staff access to CI would be required in order that EGD could make an application to the OEB for any required ARC exemptions.

- a) Please indicate which ITSS services EGD is now receiving and the cost of these.**
- b) Please map (table) to the 6 areas of ITSS listed in the application.**
- c) Explain why in 2015, EGD was able to partially participate, but did not fully participate in the ITSS consolidation.**
- d) Please indicate when the ITSS services are to begin.**
- e) Is EGD seeking any 2015 retroactive approval for cost consequences?**

Energy Probe IR #5

Ref: Appendix B, Section 3 and Figure 1

Preamble:

EGD engaged Accenture (a global management consulting, technology services and outsourcing organization) to conduct this ‘market relevant cost assessment’. The results of this can be seen in Appendix 1.

- a) Please clarify the Accenture and Gartner roles.**
- b) Please clarify if Service Desk and costs refer to Enbridge or EGD.**
- c) Please provide the revised Service Desk costs after consolidation compared to the peer group.**

Energy Probe IR #6

Ref: Appendix B, Section 3 and Figure 3 and Appendix 5.2

Please clarify what is meant by “RCAM savings” e.g. OPEX or Revenue Requirement after Tax. Provide the supporting calculations.

Energy Probe IR #7

Ref: Appendix B, Accenture OPEX cost analysis

- a) Please provide a Table that combines the Accenture Service Bundles in the Figure (untitled on page 10) and the Figure 1 Gartner Peer group services and Status quo Cost Comparison.**
- b) Please provide the Data/analysis supporting Figure 4.**
- c) Please discuss/reconcile the Peer Group RCAM and Enbridge costs to the equivalent outsourcing cost.**

Energy Probe IR #8

Ref: Appendix B, Section 3.3.5: Key drivers of RCAM efficiency savings

Please provide detailed comparisons of the comparable Service Desk Bundle functions and costs between ITSS, current EGD, Peer group and Outsourced.

Energy Probe IR #9

Ref: Appendix B, Section 4.3

- a) Please provide references and extracts to indicate the best practices industry standards for protecting customer data from either Enterprise or out sourced IT Contractors.**
- b) Provide other examples currently in place, such as CIS Services and On-Bill Access Services.**
- c) Please provide the written provisions regarding protection of customer data that EGD will require the Corporate ITSS Contractor and its employees to execute.**
- d) Is EGD concerned that specific customer data on credit/debit cards/accounts could be compromised? How specifically will EGD protect against this? Please discuss in detail.**
- e) If customer Financial Information (or personal data) is compromised, will EGD indemnify its customers? Please provide details.**